



# WINNEBAGO COUNTY

— ILLINOIS —

## APPLICANT INFORMATION SHEET

### Winnebago County, Illinois

- 1. Applicant Identification:**  
Winnebago County, Illinois  
Administration Building  
404 Elm Street  
Rockford, Illinois 61101
  
- 2. Website URL:** <https://wincoil.gov/>
  
- 3. Funding Requested:**
  - a. Grant Type: Single Site Cleanup
  - b. Federal Funds Requested: \$3,635,900
  
- 4. Location:**
  - a. City: Rockford
  - b. County: Winnebago County
  - c. State: Illinois
  
- 5. Property Information:**
  - 1800 Broadway, Rockford, Illinois 61104

The proposed cleanup site consists of approximately 4.07 acres of land in a mixed residential and industrial/commercial area on the Broadway corridor in Rockford, Illinois. The common address for the Site is 1800 Broadway, Rockford, Illinois 61104. The parcel index number (PIN) associated with the Site is 11-25-384-004. Currently, the Site primarily consists of remaining uneven concrete foundations and slabs from former industrial structures. Limited grass-covered areas are located on the southwest portion of the Site. An active, north-south transecting, railroad spur cuts through the east portion of the Site. Gravel covered surfaces and fill materials comprise the area east of the rail spur. Wooded vegetation is present along the far northern perimeter of the Site. The Site is surrounded to the north by a multi-track railroad right-of-way; to the east and south by industrial and manufacturing facilities; and to the west by single family residences and vacant residential lots. Broadway is situated south of the Site and 13th Street extends along the entire western boundary of the Site.

**6. Contacts:**

**a. Project Director:** Mr. Eric Setter, Land Bank Coordinator  
 127 N. Wyman Street, Suite 100, Rockford, IL 61101  
 Phone: 815.319.4180  
 Email: esetter@r1planning.org

**b. Chief Executive:** Joseph V. Chiarelli, Winnebago County Board Chairman  
 404 Elm Street, Rockford, IL 61101  
 Phone: 815.319.4225  
 Email: boardoffice@admin.wincoil.org

**7. Population:** 148,655 (US Census, 2020, City of Rockford)

**8. Other Factors Checklist:**

<b>Other Factors</b>	<b>Page #</b>
Community population is 15,000 or less	N/A
The applicant is, or will assist a federally recognized Indian tribe or United States territory	N/A
The priority brownfield site(s) is impacted by mine-scarred land	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The priority site(s) is in a federally designated flood plain	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures	N/A
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	5
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2015 or later) or is closing	N/A

**9. Releasing Copies of Applications:**

Not Applicable. This application does not have confidential, privileged, or sensitive information included that cannot be shared.

## **1: PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:**

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### **Target Area and Brownfields**

#### **1.a. Overview of Brownfield Challenges and Description of the Target Area**

Winnebago County is nestled in the north-central part of Illinois. According to the 2020 Census, it had a population of 285,350, making it the seventh most populous county in Illinois behind Cook County and its five surrounding collar counties. Winnebago's county seat is the City of Rockford. While manufacturing continues to be the county's largest industry, it is also the reason the County faces so many challenges from brownfields. This is true particularly in Rockford, where the City alone has a current brownfields inventory of 887 sites, including the proposed cleanup site in this application. With the County's access to Interstate highways, rail, a top-rated regional airport, and a connection to the City of Chicago, it's easy to see why manufacturing and industry were so attracted to the area. The county seat of Rockford established itself early as an industrial hub for the manufacturing of furniture, tools and dies, heavy machinery, and hardware, even gaining a reputation as the Screw Capital of the World due to the vast number of fastener and hardware manufacturers. For most of the 20<sup>th</sup> century, Rockford was a thriving manufacturing-based community for the County, with over 40% of its workforce employed in the sector as late as the 1970s. With manufacturing as its economic backbone, the recession of the 1980s landed a crippling blow to the County that has been hard to recover from. Rockford and other communities in the County faced decades of economic decline, with the loss of thousands of manufacturing jobs. The major manufacturing decline that hit the County helped produce over 1,000 brownfields county-wide, with the highest concentrations falling along the Rock River and Rockford's downtown, including the subject site of this cleanup grant application.

Winnebago County is seeking Cleanup Grant funding for a site located at 1800 Broadway in Rockford, Illinois. The cleanup site consists of a single parcel of land located along Broadway. Historical records indicate the site was used like many others in the County that face brownfield challenges, including for foundry, blacksmith, pattern shop, woodworking, electroplating, machinery, storage, and printing operations as early as 1881. By the 1950s, the Site was operated by the ELCO Tool and Screw Corporation, who manufactured metal screws, nuts, and bolts. The site experienced various other light manufacturing operations through the 1990s, with miscellaneous warehousing and storage becoming the primary operation near the end of site operations in the late 1990s. The structures on the site were abandoned and fell into disrepair over the past 20 years. Winnebago County worked with Region 1 Planning Council, as agent for the Winnebago County Trustee, to acquire the site through tax delinquency in October 2020. Structures were demolished in 2022. The site has remained vacant and undeveloped since that time. The 4.07-acre site has become a significant redevelopment and revitalization challenge for the surrounding neighborhood. The industrial structures once part of 1800 Broadway were demolished in 2022 and the land is currently vacant with only building foundations and slabs remaining. The site is in a mature and disinvested mixed use area that includes a neighborhood of occupied single family units as well as a combination of occupied and vacant industrial and retail buildings. No displacement of residents or business are planned as part of the remediation process. Measures will be taken to ensure the safety of these residents and businesses remain safe during the remediation projects. Remediation of 1800 Broadway will reduce the health disparities and make the 4.07 acre-site safe for uses such as but not limited to greenspace, retail, and light industrial. Returning the site to greenspace could improve residents' physical and mental health and add to environmental resiliency and positive sense of place. Retail or light industry would bring jobs to the neighborhood, enhancing economic resilience and stimulating further growth and improvement in the neighborhood.

The Target Area of this grant application will be the Census Tract that encompasses the site: Census Tract 17201001800. The Target Area is located in a downtown, industrial part of the City, surrounded by some other industrial sites, residential areas, and a former rail line. The Target Area Census Tract has a population of 5,618 people, who reside in some of the most impoverished neighborhoods throughout the entire City of Rockford, with poverty rates in the 94<sup>th</sup> percentile<sup>1</sup> and a 67% low-to-moderate income population. The Census Tract that comprises the Target Area has been characterized as Disadvantaged. Approximately 10,000 people live within a one-mile radius of the proposed site, and the cleanup and redevelopment of the site will have a broad, positive impact on the Rockford neighborhood where it resides. The property is known to be contaminated with volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and cyanide. The cleanup site and the surrounding neighborhoods are among the most severely impoverished in Rockford. 30% of the Target Area population does not have a high school diploma, and the median household income is approximately \$33,000, which is well below the State average of \$76,000. The

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<sup>1</sup> US Census – [www.census.gov](http://www.census.gov)

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redevelopment of the site into a productive end-use will provide the area with significantly greater public safety, health, environmental health, social justice, and economic development benefits. This cleanup grant will be the next meaningful step to overcoming the challenges currently facing the community due to the brownfield site. This site is located in a highly visible area to residents and visitors. The area surrounding the site is diverse and includes residential, commercial, industrial and recreational land uses. This is why Winnebago County is seeking US EPA Brownfields Cleanup grant funding: to address the known contaminants on the site located at 1800 Broadway in Rockford, Illinois and redevelop the property to serve the impacted disadvantaged community in the cleanup site project area.

**1.b. Description of the Proposed Brownfield Site**

The proposed cleanup site consists of approximately 4.07 acres of land in a mixed residential and industrial/commercial area on the Broadway corridor in Rockford, Illinois. The common address for the Site is 1800 Broadway, Rockford, Illinois 61104. The parcel index number (PIN) associated with the Site is 11-25-384-004. Currently, the Site primarily consists of remaining uneven concrete foundations and slabs from former industrial structures. Limited grass-covered areas are located on the southwest portion of the Site. An active, north-south transecting, railroad spur cuts through the east portion of the Site. Gravel covered surfaces and fill materials comprise the area east of the rail spur. Wooded vegetation is present along the far northern perimeter of the Site. The Site is surrounded to the north by a multi-track railroad right-of-way; to the east and south by industrial and manufacturing facilities; and to the west by single family residences and vacant residential lots. Broadway is situated south of the Site and 13th Street extends along the entire western boundary of the Site. Historical records indicate that the Site was used for industrial operations since as early as 1881, including foundry, blacksmith, pattern shop, woodworking, machinery, electroplating, storage, and printing operations. By the 1950s, the Site was primarily operated by the ELCO Tool and Screw Corporation who manufactured metal screws, nuts, and bolts. Multiple machining, manufacturing, and packaging companies operated at the Site through 2005 and storage and warehousing operations were noted in 2017. The railroad spurs on the Site appear to have been in use since at least 1950. The Winnebago County Tax Trustee took ownership of the Site through tax foreclosure on October 23, 2020.

A Phase I Environmental Site Assessment (ESA) was completed for the Site in September 2021. Recognized Environmental Conditions (RECs) were identified associated with historical industrial operations at the Site. An initial Phase II investigation was completed through the United States Environmental Protection Agency (USEPA) Region 5 Technical Brownfields Assistance program in July 2023. Region 1 Planning Council completed supplemental Phase II ESA investigations in May and September 2024 through a coalition assessment grant in preparation for enrollment into the Illinois Environmental Protection Agency (IEPA) Site Remediation Program (SRP). Each environmental assessment is summarized below:

***Phase I ESA – Fehr Graham (September 24, 2021):*** A Phase I Environmental Site Assessment (ESA) was completed for the Site on behalf of the City of Rockford. The following recognized environmental conditions (RECs) were identified associated with the Site:

- » Historical foundry operations in an earthen floor structure present the potential for past releases of chemicals such as metals, petroleum compounds, and polynuclear aromatic hydrocarbons (PNAs) from foundry operations and/or improper storage or disposal of waste molding sands.
- » Historical electroplating operations present the potential for past releases of chemicals such as metals, cyanide, acids or bases, and cleaning solvents from leaks or spills from plating baths or cleaning areas and/or dumping of waste chemicals.
- » Historical printing operations with documented use of gasoline and naphtha for cleaning type components present the potential for past releases of gasoline, naphtha, inks, and/or other hazardous chemicals used in printing.
- » Other historical industrial operations including machine shops, painting, woodworking, metal working, and electronics manufacturing with documented use of hazardous materials and petroleum products and hazardous waste compliance violations present the potential for past releases of various petroleum products and industrial chemicals, including polychlorinated biphenyls (PCBs).
- » Open burning on the Site by industrial tenants in the early 1960s presents the potential for past releases of hazardous materials and petroleum products to underlying soils through incomplete incineration and/or production of combustion residuals.

- » There is a documented release to the environment from underground storage tanks (USTs) removed in 1988. The release was closed based on a heating oil exemption but has not been fully investigated or remediated.
- » Railroad spurs and tracks located on the Site since before 1891 presents the potential for releases of hazardous materials and/or petroleum products through accidental spills of fuel or transported materials, engine emissions, leaching metals from tracks, and application or leaching of track and tie treatments.

**Phase II ESA – Tetra Tech (2023):** Through the US EPA Region V Technical Brownfields Assistance program, Tetra Tech, Inc. conducted a Phase II ESA in July 2023. This initial Phase II ESA included the advancement of 10 soil borings to a maximum depth of 45 feet below ground surface (bgs) to facilitate the collection of 21 soil samples. Soil samples were collected from the upper three (3) feet and between 3 to 10 feet bgs. Four (4) temporary groundwater monitoring wells were advanced up to 45 feet bgs to facilitate the collection of five (5) groundwater samples. Additionally, four (4) concrete samples were collected and analyzed for PCBs.

**Phase II ESA – Fehr Graham (Summer 2024):** A comprehensive Phase II ESA with supplemental sampling event was completed by Fehr Graham in May and September 2024 to further evaluate and delineate the presence of soil and groundwater contamination identified in the 2023 Phase II ESA completed by Tetra Tech, Inc. These investigations were also completed to provide site characterization and datasets for enrollment of the Site in the IEPA SRP. A total of 36 soil borings were advanced and eight (8) permanent groundwater monitoring wells were installed to characterize and evaluate contamination in soil and groundwater at the Site. The depth of investigation extended to a maximum depth of 45 feet below ground surface. Analytical results indicated elevated PCE, semi-volatile organic compounds, metals, and pesticides detected above TACO Tier 1 remediation objectives in soil. Elevated concentrations of PCE, several semi-volatile organic compounds, and chromium were also confirmed in groundwater. The Site was enrolled in the Illinois Site Remediation Program in late 2025 in pursuit of a No Further Remediation (NFR) designation. The combined Phase II ESAs included 46 soil borings advanced to depths ranging from 10 to 45 feet below ground surface (bgs) and the installation of eight (8) permanent and four (4) temporary groundwater monitoring wells to facilitate the collection of 91 soil samples and 15 groundwater samples for laboratory analysis.

Winnebago County aspires to eliminate and prevent blight in and around the site by facilitating redevelopment activities like an outdoor gathering space or light industrial/manufacturing work. Addressing the identified contamination on the site to move the project towards its end use is a critical component of the redevelopment strategy. The objective of site remediation and cleanup activities is to protect human health and the environment at the site during demolition, construction and future use.

## **Revitalization of the Target Area**

### **1.c. Reuse Strategy and Alignment with Revitalization Plans**

Winnebago County has been working with the Region 1 Planning Council on the reuse plans for this site due to their experience as an organization combined longstanding planning and special purpose governmental entities which represented regional planning efforts. As the recognized Economic Development District for northern Illinois, Winnebago County's brownfields redevelopment strategy will be led by the 2026-2030 Comprehensive Economic Development Strategy (CEDS) plan created for the region. The CEDS Plan will represent a continued focus on regional collaboration in support of economic development planning. The Region's economic indicators, shared strengths, assets, and partnerships have grown and progressed since the completion of the 2016-2020 CEDS. The Region continues to share industry strengths, transportation and infrastructure assets, regional economic development partnerships, and a shared economic development strategy which forms the basis for collaboration. Together, the Northern Illinois Region remains a competitive region in the global economy and can better leverage limited local, state, and federal funds to drive job creation, an improved quality of life, and development strategies described within this document. The specific reuse strategy and revitalization plan for the cleanup site at 1800 Broadway includes plans for the use of the site for public gathering space or light industrial/manufacturing development. The CEDS plan will allow Winnebago County to lead the redevelopment efforts by directly following the plan set forth by the region's stakeholders.

Cleanup of the identified soil and groundwater contamination is a critical component to redevelopment, specifically to protect sensitive human receptors at and surrounding the site. Winnebago County has already enroll the Site into the Illinois Environmental Protection Agency

(Illinois EPA) Site Remediation Program (SRP). The remaining building foundations and slabs currently act as barriers on the site but will require repair and replacement to adequately sever exposure to underlying soil contaminants.

#### **1.d. Outcomes and Benefits of Reuse Strategy**

Brownfields redevelopment is crucial to the region's economic growth. Although Winnebago County's business incentives will help attract development, the use of brownfields cleanup grant funds will further position environmentally challenged properties for redevelopment and reuse. Redeveloping this site will improve the neighborhood and bring residential and recreational value to local residents, which in turn will bring investors and developers to the area, eager to purchase and redevelop remediated property. This will increase property and tax investments into the site and area. With the County's plans for overall brownfields redevelopment, investment in the City of Rockford will create hundreds of jobs and improve the overall economic quality of the region. Much of the available manufacturing and industrial site stock in the City of Rockford, particularly in the Target Area where the many sensitive populations live, are vacant, blighted, and completely underutilized. The only draw for redevelopment to this area now is the lower cost of property, not the quality of life for the immediate area. Winnebago County aims to have site redevelopment in the target area, and adjacent to the proposed cleanup site, become desirable not just for the cost, but for the proximity to well-planned and vibrant development that will provide businesses and residents with the services they desire and need in walking distance from their office and homes. As brownfields are redeveloped with mixed-uses, Winnebago County will attract economic development from neighboring communities, increasing the area's population and diversifying its workforce, rendering it less vulnerable to economic swings due to manufacturing losses like they experienced in the past. If awarded, these cleanup grant funds will also facilitate the development of recreational and public use around the cleanup site, improving the quality of life for all residing in the Target Area.

#### **Strategy for Leveraging Resources**

##### **1.e. Resources Needed for Site Characterization**

The County believes all necessary assessment work has been completed on the site. There was an initial Phase I ESA completed in 2021, paid for by the City of Rockford in partnership with Region 1 Planning Council. The City and R1 sought out Region 5 US EPA Targeted Brownfields Assessment funding for initial Phase II ESA work in 2023, and then conducted an updated Phase II ESA in 2024 under Region 1's Brownfields Coalition Assessment Grant. If the site needs additional assessment work done prior to remediation activities, the County will utilize available local assessment funding through Region 1 Planning Council, the City of Rockford, IEPA, and Community Partners identified in this application for additional resources needed.

##### **1.f. Resources Needed for Site Remediation**

The subject site project is a small-scale redevelopment project for significantly blighted property. The 4.07 acre site has been abandoned and has become a significant redevelopment challenge for the surrounding disadvantaged neighborhood and City of Rockford. The site's redevelopment plan of impactful outdoor gathering space and/or light industrial/manufacturing will cost millions of dollars in total. It is estimated that \$3,635,900 is needed for the site remediation activities described in this application. Winnebago County is already in the process of seeking any necessary additional remediation funding assistance from state and federal agencies including US EPA Brownfields Program, IEPA Municipal Brownfields Program, Illinois Department of Commerce & Economic Opportunity (DCEO), and US EDA.

##### **1.g. Resources Needed for Site Reuse**

As mentioned above, the 4.07 acre site will take years and approximately \$3,635,900 to move the site towards its full reuse strategy. Once site remediation is complete, the Winnebago County will tap into the following funding resources to help finance the preparation the site for its future redevelopment: Rockford CDBG funding, US EDA Public Infrastructure funding, TIF district financing, Enterprise Zone and Opportunity Zone credits, New Market Credits, private investment dollars, local lending dollars, and project donation dollars. This effort will be coordinated as described in the Region's CEDS Plan, which is guiding the reuse and revitalization efforts of this project. It's anticipated that the site reuse development plans will cost millions of dollars, so the County will be seeking funding assistance from every possible angle for this development.

##### **1.h. Use of Existing Infrastructure**

The planned reuse/redevelopment plans for the cleanup site will primarily utilize existing infrastructure – this includes adaptive reuse plans for utilizing existing on-site parking lots/facilities, site access roads, rail spur, local roads, sidewalks, curb and gutters, water, sewer, gas, and electricity

infrastructure. The site's footprint is large enough and old enough that new infrastructure may be needed to adequately serve the redevelopment. In this case, the existing infrastructure may need to be extended from the City's right-of-way, and the County will work with the City of Rockford in those instances. Winnebago County's redevelopment priority is on infrastructure reuse, but will work with developers when new infrastructure is required. New infrastructure may be required for broadband capabilities or any energy efficiency installations like solar power, as they do not currently exist at the site. The County will reference their Hazard Mitigation Plan to ensure any redevelopment plans do not make the area less resilient to extreme weather and natural disasters, like flooding and tornadoes.

## **2: COMMUNITY NEED AND COMMUNITY ENGAGEMENT:**

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### **Community Need**

#### **2.a. The Community's Need for Funding**

Winnebago County lacks financial resources to effectively carry out brownfields remediation work on their own, facing the challenges of high delinquent taxes on County Trustee-owned properties like 1800 Broadway. With no funding for site remediation beyond building demolition, properties often remain in the County Trustee program. Property taxes are not collected in the program. The region has high rates of tax delinquency and tax buyers don't purchase back taxes, leading to properties being placed into the Trustee program, the program typically houses brownfield sites. The trustee properties are able to take advantage of city services but often attract crime, such as dumping, arson, and vandalism. Winnebago faces challenges with delinquent taxes and properties ultimately being owned by the County Trustee. In fact, over \$6,000,000 in delinquent taxes and 2,500 parcels were at the most recent Winnebago County tax sale. In Winnebago County, R1 is the appointed Agent for the Tax Trustee. Winnebago County has significant percentages of sensitive populations clustered in and around Rockford, its largest city. Per the US Census Bureau, the County has a poverty rate of 15.4 percent. In Rockford, poverty climbs to 22.2 percent. The County experienced population loss of 3.4 percent between 2010 and 2020 and Rockford's population has decreased by 2.75 percent.

The situation is extreme in Rockford's Census Tract 18, the location of 1800 Broadway. The majority racial demographics of the 5,618 residents are 34 percent white, 24 percent Black/African American, and 32 percent Hispanic/Latino. Of all these, 32.5 percent live in poverty, including 55 percent of children under age 18. The median household income is \$33,396, two-thirds of the city's and half that of Winnebago County's. Over half (55 percent) of the tract's housing are rentals and 11 percent of all housing units are vacant. Slightly over half (52 percent) are multi-family units. The median value of owner-occupied units is only \$84,500 and only 70 percent of residents have at least a high school diploma, well under Rockford's 85.4 percent and Winnebago County's 88.5 percent. The Census clearly identifies Census Tract 18 as disadvantaged, meeting five burden thresholds, including the economic threshold. The remaining thresholds met are Housing, Legacy Pollution, Water and Wastewater, and Workforce Development. The neighborhood, a formerly redlined area, is negatively impacted by historic underinvestment in housing, a lack of greenspace, and is above the 65th percentile for low income (less than or equal to twice the federal poverty level). Exposure to Legacy Pollution is high, with scores above the 90th percentile for proximity to hazardous waste facilities (93rd percentile), proximity to risk management plan facilities (99th percentile) and proximity to Superfund sites (99th percentile). Tract 18 is above the 90th percentile in Water and Wastewater. It is in the 93rd percentile for underground storage tanks and releases and the 98th percentile for wastewater discharge. Finally, the neighborhood exceeds thresholds for Workforce Development in several categories: poverty (94th percentile), unemployment (95th percentile), and high school education (30 percent). Note the high school education threshold for high school education is 10 percent but a whopping 30 percent of residents in Census Tract 18 lack this basic credential.

#### **2.b. Health or Welfare of Sensitive Populations**

Winnebago County has identified the sensitive populations that are being disproportionately affected by the subject brownfields site. They include minorities, children, persons living in poverty, and women of child bearing age. Within the Target Area, US Census data shows that 66% of the population is comprised of minorities, with 24% of the population being African American and 32% of the population being Latino. The Target Area's age breakdown is 77% comprised of ages 10-64 years old and 12% comprised of children under 10, illustrating a vast threat to the health and safety of the population of women, children, and women of child-bearing age in the neighborhood. 94% of the population in the Target Area live below the poverty level. By remediating the environmental contamination issues at the project site with these grant funds, any threat of exposure by nearby sensitive populations to contaminants via direct contact, inhalation, vapor intrusion or ingestion will

be reduced or eliminated. The redevelopment opportunities that will be created with this project to serve the most sensitive populations in the project area will be directly addressing the issues created by the current brownfield contaminants.

**2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions**

A review of the US Census data, HUD data, EPA environmental data, and even former Climate & Economic Justice Screening tool data shows a number of cumulative environmental issues present in the Target Area that illustrate a greater than normal incidence of disease and adverse health conditions. The Target Area Census Tract has the following health conditions and percentiles: Asthma – 88<sup>th</sup> percentile, Diabetes – 80<sup>th</sup> percentile, Heart Disease – 74<sup>th</sup> percentile, and a Low Life Expectancy in 82<sup>nd</sup> percentile. The threat of lead paint is apparent in 85% of the houses and buildings in the project area. By remediating the environmental contamination issues at the project site with these grant funds and pushing the subject site to a more productive end use, the disadvantaged community directly affected in the neighborhood will be the beneficiaries of positive impacts of brownfields redevelopment. This includes blight removal, economic rejuvenation in the neighborhood, the creation of truly impactful and life-changing housing opportunities, and creating more development interest in the Target Area.

**2.d. Economically Impoverished/Disproportionately Impacted Populations**

The Census data includes some dire statistics for the Target Area Census Tract, including following:

- The Census Tract is designated as a Disadvantaged Area
- Census Tract is an area of Historic Underinvestment, meaning Census tracts with historically high barriers to accessing home loans
- Lack of Greenspace for the residents in the Census Tract is in the 85<sup>th</sup> percentile
- the Census Tract has a Low-Income percentile of 94, which means that household incomes in the area are equal to or twice the federal poverty level
- the Housing Cost Burden is in the 83<sup>rd</sup> percentile – low income household are spending more than 30% of their income on housing
- houses with lead paint in the Census Tract is in the 85<sup>th</sup> percentile
- Linguistic Isolation is in the 80<sup>th</sup> percentile
- Unemployment in the Census Tract is in the 99<sup>th</sup> percentile
- Poverty in the Census Tract is in the 95<sup>th</sup> percentile
- 34% of people ages 25+ have an education level that is less than a High School Diploma
- Transportation Barriers are in the 97<sup>th</sup> percentile

Winnebago County’s redevelopment efforts are directly confronting the problem that impoverished communities are more likely to suffer from a lack of clean water and air and a lack of safe housing. These conditions are often the direct result of abandoned sites like this one and it’s frequent proximity to low-income neighborhoods. Due to these statistics above, throughout their remediation efforts, the County will work to educate stakeholders on the importance of integrating principles of environmental justice and equitable development into the cleanup and redevelopment of the cleanup site, including: ensuring equitable access to amenities such as health clinics and grocery stores, working with minority- and women-owned businesses, ensuring jobs with living wages, partnering with community-based organizations and neighborhood leaders to enhance the understanding of environmental and health-related issues at the community level, creating commercial linkage strategies, and reusing brownfield sites for greenspace and other healthy, safe and walkable areas for the cleanup site. The County will also work to provide accessible and culturally appropriate opportunities for low-income, minority and linguistically isolated stakeholders to meaningfully participate in decision-making processes on the proposed brownfield cleanup.

**Community Engagement**

**2.e. Project Involvement and 2.f. Project Roles**

<b>Name of Organization</b>	<b>Point of Contact (name, phone, email)</b>	<b>Specific Role in the Project or Assistance Provided to the Project</b>
<b>Community Advisory Forum</b>	Name: Chelsey Gatz Phone: 815.319.4180 Cglatz@R1Planning.org	This group is the liaison to dozens of community groups in the Rockford area. Information will be shared with the CAF and local stakeholders on the progress of the cleanup project.
<b>Winnebago County Health Dept</b>	Name: Dr. Sandra Martell Phone: 815-720-4000 Email: smartell@wchd.org	The Winnebago County Health Department will be helpful for public outreach related to the site contaminants – this is true prior to, during, and after remediation activities.

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<b>Region 1 Planning Council</b>	<b>Name:</b> Michael Dunn <b>Phone:</b> 815.319-4180 <b>Email:</b> mdunn@r1planning.org	As the Winnebago County Trustee and owner of the property, R1 will need to work with the County to approve all future redevelopment and sales on-site. Community Engagement efforts will be lead by R1 in conjunction with the County.
<b>City of Rockford</b>	<b>Name:</b> Rob Wilhelmi <b>Phone:</b> 779.348.7425 robert.wilhelmi@rockfordil.gov	The City of Rockford has site knowledge and will be the lead agency for demolition, which will be critical in the site redevelopment plan.

**2.g. Incorporating Community Input**

Winnebago County will partner with the Region 1 Planning Council (R1) to lead community engagement for this project, collaborating with community partners to reach a broad audience. A key component of their engagement strategy will be through the Community Advisory Forum (CAF), which brings together representatives from various organizations, local leaders, and residents to ensure diverse perspectives from across the County and R1’s service area. The CAF will serve as a vital partner in this initiative. In addition to the CAF, Winnebago County and R1 will host a public hearing to provide an opportunity for community members to engage directly with the project. For additional engagement, the County will post on social media accounts such as LinkedIn, as well as creating an online page on the County and R1 website, which is designed to raise awareness about plans, projects, and programs. The County will also employ techniques such as public comment boards and FAQs to encourage public involvement. These strategies will be particularly important for ensuring that residents in the Rockford Region are well-informed about the cleanup grant project. Feedback received from the community will be incorporated into project reports and shared at the public hearing to enhance the project’s development. The County will hold events in accessible locations and at convenient times to encourage participation and will regularly update the website page with information about the planning process and upcoming events. Additionally, the County will use local data to identify vulnerable communities to tailor our engagement efforts to assess their specific needs.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS:**

**3.a. Proposed Cleanup Plan**

The proposed task are based, in part, on the Analysis of Brownfield Cleanup Alternatives (ABCA) prepared for activities associated with the cleanup of the site located at 1800 Broadway, Rockford, IL. The tasks and activities described below are eligible uses of funds and are specifically designed to be effectively completed within the four-year period of performance. The proposed cleanup plan is as follows: Soil Excavation and Engineered Barrier Replacement – The cleanup approach involves excavation of contaminated soils in five (5) distinct hotspot locations on the site to address heavy metals in shallow soil. Two (2) of the hotspot excavations will address hazardous lead concentrations, requiring in situ stabilization prior to excavation and disposal. Further, the existing concrete pad and foundation elements are deteriorating and will not provide a long-term solution to “cap” underlying contamination. The foundations and slabs will be replaced with a green alternative barrier to allow for more Site redevelopment possibilities. Groundwater will be treated through remedial injections to reduce the concentration of chromium near the center of the site. This cleanup alternative is anticipated to be the most effective in reducing exposure to underlying soil contamination while creating a shovel-ready and safe site for future occupants, while additionally making the Site more marketable for potential redevelopment.

<b>Task 1: Program Management</b>	
<b>b. Project Implementation:</b>	This task includes Winnebago County’s oversight of the Cooperative Agreement with US EPA for this project, ensuring compliance with the Agreement, Work Plan, Schedule, and EPA’s regulations. This task also includes preparation/submittal of Quarterly and Annual Reports, entering information in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database for the project, procurement of a Qualified Environmental Professional to lead the project, management of the federal grant funds for the project, Winnebago County staff attendance at a US EPA Brownfields Conference, and final closeout.
<b>c. Anticipated Schedule:</b>	This task will start immediately upon project award and will be ongoing continuously throughout the entire four-year project period. The QEP will be procured in the first quarter of the grant.
<b>d. Task/Activity Lead:</b>	This task will be led by the Winnebago County Tax Trustee program director, with assistance by a financial officer,
<b>e. Outputs:</b>	Executed Cooperative Agreement, Contract with Qualified Environmental Professional, 16 Quarterly Reports, 4 Annual Reports, Quarterly Updates to ACRES,

WINNEBAGO COUNTY, ILLINOIS  
FY26 BROWNFIELDS CLEANUP GRANT

attendance of Winnebago County Staff at a National Brownfields Conference, and final closeout documentation to US EPA
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<b>Task 2: Community Involvement</b>
<b>b. Project Implementation:</b> This task includes cooperation between Winnebago County, Qualified Environmental Professional (QEP), and Project Partners to implement the community involvement and community relations plan to inform residents, property owners, and the public about the status of the project. This task also includes website updates and printed public information materials as needed. Public comments, questions, and concerns will be addressed under this task.
<b>c. Anticipated Schedule:</b> This task will commence immediately upon project award and will continue throughout the entire four-year project period. One public meeting and one fact sheet will be produced each year of the project.
<b>d. Task/Activity Lead:</b> This task will be led by Winnebago County representatives with assistance from the selected Qualified Environmental Professional and Project Partners.
<b>e. Outputs:</b> 4 Public Meetings and Meeting Minutes, 4 Website Updates, 4 Fact Sheets

<b>Task 3: Cleanup Planning</b>
<b>b. Project Implementation:</b> Prior to site cleanup work, the Qualified Environmental Professional will prepare a site-specific work plan including the Health & Safety Plan, Quality Assurance Project Plan, finalize the ABCA, and coordinate with Winnebago County to finalize the Cleanup Plan, including selective excavations, stabilization, and engineered barrier replacement. Winnebago County, with assistance from a QEP will secure all necessary permits and prepare bid documents to select a competitive, qualification-based Cleanup Contractor in compliance with federal, state, and local procurement requirements.
<b>c. Anticipated Schedule:</b> This task will commence after Winnebago County selects a Qualified Environmental Professional, approximately 90 days after award.
<b>d. Task/Activity Lead:</b> This task will be led by the Qualified Environmental Professional.
<b>e. Outputs:</b> Health & Safety Plan, Quality Assurance Project Plan, finalize the ABCA Decision Document, Plans & Specs, Permits, and selection of Cleanup Contractor to perform site preparation and remediation activities at the project site, and contract documents for the QEP

<b>Task 4: Cleanup Activities</b>
<b>b. Project Implementation:</b> This task includes hazardous lead stabilization in two (2) specific locations, five (5) hotspot soil excavations, haul-away and disposal of approximately 415 cubic yards of contaminated soils at a permitted disposal facility, and replacement of approximately 108,820 ft <sup>2</sup> of deteriorated concrete surfaces with an alternative green engineered barrier with no-dig geofabric installation and clean fill. Confirmation sampling will be completed following hotspot excavations. In addition, this task includes direct push injections for remediation of chromium in groundwater in a localized area of the site. Follow-up reporting, documenting the cleanup, will be developed for submittal to the Illinois EPA SRP.
<b>c. Anticipated Schedule:</b> This task will commence in the Spring of 2027 and conclude in Fall of 2028.
<b>d. Task/Activity Lead:</b> This task will be led by the Qualified Environmental Professional with physical remediation activities completed by the Cleanup Contractor.
<b>e. Outputs:</b> Pre-Construction Meeting/Minutes, site preparation, lead stabilization, hotspot excavation, barrier replacement documentation, lab reports for confirmation sampling, and a final cleanup report.

<b>Task 5: Revitalization Planning</b>
<b>b. Project Implementation:</b> This Task includes the development one (1) revitalization plan for the Cleanup Site to include consideration for environmental impairments and remedies, as well as market and feasibility study.
<b>c. Anticipated Project Schedule:</b> This Task will start in the third year of the project period with planning anticipated to be complete within one year of commencement.
<b>d. Task/Activity Lead:</b> This task will be led by the Winnebago County Tax Trustee program director who will be assisted by Region 1 Planning Council's planning team.

**WINNEBAGO COUNTY, ILLINOIS  
FY26 BROWNFIELDS CLEANUP GRANT**

**e. Outputs:** The anticipated outputs of this task include: one (1) revitalization plan specific to the cleanup site.

**f. Cost Estimates:**

Budget Categories		Project Tasks					TOTAL
		Task 1: Program Management	Task 2: Community Involvement	Task 3: Cleanup Planning	Task 4: Cleanup Activities	Task 5: Revitalization Planning	
<b>Direct Costs</b>	<b>Personnel</b>	\$5,280	\$4,400	--	--	\$17,600	\$27,280
	<b>Fringe Benefits</b>	\$3,360	\$2,800	--	--	\$11,200	\$17,360
	<b>Travel</b>	\$3,400	--	--	--	--	\$3,400
	<b>Equipment</b>	--	--	--	--	--	--
	<b>Supplies</b>	--	\$300	--	--	--	\$300
	<b>Construction</b>	--	--	--	\$3,368,280	--	\$3,368,280
	<b>Contractual</b>	\$10,660	\$10,920	\$57,500	\$140,200	--	\$219,280
	<b>Other</b>	--	--	--	--	--	--
<b>Total Direct Costs</b>		\$22,700	\$18,420	\$57,500	\$3,508,480	\$28,800	\$3,635,900
<b>Total Federal Funding</b>		\$22,700	\$18,420	\$57,500	\$3,508,480	\$28,800	\$3,635,900
<b>Total Budget</b>		\$22,700	\$18,420	\$57,500	\$3,508,480	\$28,800	\$3,635,900

**Task 1:** This budget includes \$8,640 for 120 hours of work by Winnebago County representatives at \$44/hour and a fringe of \$28/hr. \$10,660 of Contractual work time at \$130/hour rate, which will provide approximately 82 hours of QEP time for program management activities over the duration of the grant. The remaining \$3,400 is for two (2) Winnebago County representatives to attend the National Brownfield Conference (Airfare at \$600 each (\$1,200), Lodging at \$175 per day for 4 days each (\$1,400), Meals \$100 per person for 4 days each (\$800)).

**Task 2:** This budget includes \$7,200 for 100 hours of work by Winnebago County representatives at \$44/hour and a fringe of \$28/hr. This budget also includes \$300 for supplies for community engagement deliverables, and \$10,920 of QEP time to help Winnebago County in the development of Fact Sheets, Website updates, and conducting Public Meetings (84 hours of Qualified Environmental Professional at \$130/hour rate).

**Task 3:** The \$57,500 Cleanup Planning Budget will be for the development of the HASP, QAPP, finalization of the ABCA, Plans & Specs and permitting for the project, and assistance with bidding. At \$130/hour, this will provide approximately 442 hours of QEP consultant time for this task.

**Task 4:** The \$3,368,280 Construction Budget will be for mobilization and site preparation, hazardous lead stabilization, hotspot excavation of 415 cubic yards of contaminated soil, removal of 108,820 ft<sup>2</sup> of existing concrete foundations followed by installation of alternative green barrier with geofabric, remedial groundwater injections to address chromium impacts, and demobilization. The Contractual QEP budget includes 680 hours of documentation and project management during remedial activities at \$130/hr (\$88,400), post remediation confirmation sampling and analysis (\$13,450), and final reporting (295 hours at \$130/hr). Total Contractual costs under this task will be \$140,200. The amount of time for the remediation is subject to the procured cleanup contractor availability but is expected to be substantially complete within 3 years of grant award.

**Task 5:** This \$28,800 budget includes time for Winnebago County and Region 1 Planning personnel to develop a revitalization plan for the cleanup site that will align with required institutional and engineering controls and provide planning and market study to position and market the site for redevelopment. Up to 400 hours at \$44/hr and fringe of \$28/hr will be used by Winnebago County and Region 1 personnel for revitalization planning and market study to incorporate environmental impairment items to provide pertinent information for redesign and reuse.

**3.g. Plan to Measure and Evaluate Environmental Progress and Results**

To ensure that Winnebago County's project achieves the intended results of the Cleanup Grant and completes the outputs of each task listed above, the County will carefully track, measure, and report project performance through annual reports, quarterly reports, ACRES reporting, and with the implementation of their Community Involvement Plan. Quarterly and Annual Reports will cover project progress, any difficulties encountered, a record of financial expenditures, data results, and anticipated further actions. Specific accomplishments, contaminants found, which materials were impacted, and resources required to leverage and complete the planned reuse will all be reported on, and will be posted to the County's and Region 1's websites to keep the community involved on the status of the project. This site will be entered into the ACRES database, which will also be utilized to track job creation and acres of land assessed as part of this grant project. Anticipated quantifiable outcomes from this project include the number of acres of land remediated and the square footage of abatement completed, while other outcomes include liability protection for the site owner, removal of blight, reduction or elimination of future contaminant exposure, improving community health, and the return of the site to a productive mixed use. Periodic meetings with the QEP and the Cleanup

Contractor will take place to ensure deadlines and milestones are being met - corrective actions like liquidated damages will go into effect if the project deadlines and milestones are not being met.

**TASK 4: PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:**

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**Programmatic Capability**

**4.a. Organizational Structure**

The County has sophisticated systems, processes, and procedures in-place to ensure that they can fulfil the technical, administrative, and financial requirements of this cleanup grant. As a legislative body, the Winnebago County Board enacts ordinances and resolutions. As an executive body, the board administers the activities of county departments, except those headed by other elected county officials. As a governing body, the board is responsible for adopting an annual budget for the county, establishing its tax rate, and authorizing voter-approved bonds. The County's partner on this project, Region 1, is a federally-designated, multi-county Regional planning organization that provides economic development, transportation, environmental, and land use planning to its service area. Both the County and R1 have deep experience writing and managing state and federal grants from a variety of agencies including but not limited to the US EPA, Illinois EPA, US Economic Development Administration, Illinois Department of Commerce & Economic Opportunity, and the Illinois Housing Development Authority. The organization's team includes experts in environmental resilience, housing, land use, planning, and economic development.

**4.b. Description of Key Staff**

Marlana Dokken, the Director of the Chairman's Office of Criminal Justice Initiatives at Winnebago County will work with Eric Setter of Region 1 to manage this project. Eric Setter is the Director of Community Revitalization and is the project coordinator. Previously, Setter managed a Brownfield Multi-Purpose Assessment Grant for the City of Peoria, IL prior to joining R1. Current responsibilities include land bank management, blight reduction projects, including acquiring abandoned properties for reuse, and managing a USEPA Coalition Assessment Grant. Dokken will provide executive oversight on the project. Setter will be coordinating with Dokken and the County on community engagement activities for the project. The Winnebago County Treasurer's office will be working with Kayla Gipson – Gipson is R1's Director of Finance and leads agency and grant financial reporting including billing, financials, budget creation, and reporting. Dokken and Setter will be responsible for management of the grant and coordinating with QEP.

**4.c. Acquiring Additional Resources**

Winnebago County will identify, coordinate and leverage any public and private resources needed to complete the described grant tasks. The County will follow EPA's procurement policies to hire a Qualified Environmental Professional (QEP) to effectively and efficiently assist the County in managing the Assessment grant project. The QEP will assist the County in preparing bid documents needed to select a contractor to conduct the cleanup work, and manage the remediation project as it commences. All procurement will follow federal procurement regulations and any other additional requirements needed for procurement under an EPA Cooperative Agreement. Winnebago County has the ability to procure services/contractors that meets the Federal procurement requirements. The County will work with its Project Partners to develop a management plan for taking over the grant project if any person serving the major roles were to leave the project.

**Past Performance and Accomplishments**

**4.e. Has Not Received an EPA Brownfields Grant but has Received Other Federal Funding**

Winnebago County has not received an EPA Brownfields Grant; however, Region 1 Planning Council was the recipient of a \$1 million Coalition Assessment in 2023 that is currently being used to conduct Phase I and Phase II environmental site assessments and cleanup planning for eligible sites throughout Winnebago County and neighboring Boone County.

**1) Accomplishments:**

As of January 2026, the coalition has completed eight Phase I ESAs and three Phase II ESAs under the coalition assessment grant. A cleanup plan for the target cleanup site was also completed under the coalition assessment grant.

**2) Compliance with Grant Requirements:** Winnebago County works extensively with federal funding, making them aware of the programmatic requirements involved in successfully managing projects. As a Coalition Member of the grant listed above, the County works with R1 to strictly adhere to the workplan and comply with the schedule, terms & conditions, and reporting requirements which include quarterly reports, federal financial reports, ACRES, DBE reports, and where appropriate, HASP and QAPP, and finalizing the Analysis of Brownfield Cleanup Alternative (ABCA) reports. This Coalition Grant is still open and no programmatic issues have taken place to date.

**THRESHOLD CRITERIA:**

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**1. Applicant Eligibility:**

Winnebago County is a county government agency in the State of Illinois and has the authority to enter into a cooperative agreement for a Cleanup Grant with the United States Environmental Protection Agency.

**2. Previously Awarded Cleanup Grants:**

The proposed cleanup site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

**3. Expenditure of Existing Multipurpose Grant Funds:**

Not Applicable. Winnebago County has not been a recipient of a Multipurpose Grant.

**4. Site Ownership:**

Winnebago County is the owner of the proposed cleanup site. The site was acquired on October 23, 2020.

**5. Basic Site Information:**

- (a) Site name: Former ELCO Tool & Screw
- (b) Address: 1800 Broadway Rockford, Illinois 61104 (1 parcel)
- (c) Current Owner: Winnebago County

**6. Status & History of Contamination at the Site:**

**(a) Contamination:** Hazardous Substance and Petroleum Products. Volatile organic compounds (VOCs) including Tetrachloroethene and Chloroform; Semi-volatile organic compounds (SVOCs) including Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Dibenzo(a,h)anthracene, Naphthalene, Carbazole, Chrysene, and Indeno(1,2,3-c,d)pyrene; Pesticides including alpha-BHC; Inorganic Compounds including Aluminum, Arsenic, Cadmium, Chromium, Copper, Cyanide, Iron, Lead, Manganese, Mercury, Nickel, and Selenium, have been identified in soil and/or groundwater above the Illinois EPA Tiered Approach to Corrective Action Objectives (TACO) Tier 1 remediation objectives.

**(b) Operational History & Current Use of Site:** A manufacturing building and railroad spurs were constructed in approximately 1891. According to historical and environmental records, the Site expanded operations with new warehouses, rail spurs, and additional manufacturing buildings to hold and process raw and finished products including coal, sand, and lumber, and later tooling and machining operations through 1990. The eastern portion of buildings burned down in a fire in 1990, and the remaining portion of the building was demolished in 2022. The Site has been primarily vacant since the 1990s.

**(c) Environmental Concerns:** Former foundry operations, electroplating operations, printing operations, industrial operations, open burning, underground storage tank (USTs),

railroad spurs and tracks left behind contamination in soil and groundwater. The contamination directly impacts redevelopment of the Site, as contaminant concentrations have been identified above state remediation objective thresholds for soil inhalation and ingestion and groundwater ingestion. As a result, soil and groundwater remediation will be necessary to protect human health and the environment. Remediation will prepare the site for future development as a public gathering space or light industrial use.

**(d) Source of Contamination and Nature and Extent of Contamination:**

Based on assessment work, VOCs, SVOCs, Pesticides, Metals, and Cyanide contamination in shallow soils and groundwater are likely related to former manufacturing operations and railroad spurs.

**7. Brownfields Site Definition:** The 1800 Broadway site meets the definition of a brownfield. This site is (a) Not listed or proposed for listing on the National Priorities List; (b) Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; (c) Not subject to the jurisdiction, custody, or control of the U.S. Government.

**8. Environmental Assessment Required for Cleanup Grant Applications:**

A Phase I ESA was completed by the City of Rockford on September 24, 2021, to evaluate the presence of Recognized Environmental Conditions (RECs) related to the Site and surrounding properties. The Phase I ESA identified RECs related to historical foundry operations, electroplating operations, printing operations, industrial operations, open burning, underground storage tank (USTs) releases, railroad spurs and tracks, and historical chemical spill migration from adjoining site. A Phase II ESA was completed by the USEPA Region 5 TBA program during the summer of 2023, to provide a preliminary evaluation of the RECs. Supplemental Phase II ESAs were completed by Region 1 Planning Council in May 2024 and September 2024 to further evaluate the extent and presence of subsurface contamination.

**9. Site Characterization:**

Per Illinois EPA's Acknowledgment Letter on January 22, 2026, which is included in this application submittal, the Illinois EPA states: "*Winnebago (County) is applying for a \$ 3,635,900 Cleanup Grant. The grant will be a Cleanup Grant for Hazardous Substances and will be used on a site located at 1800 Broadway Rockford, IL 61107. The site enrolled in the State of Illinois Site Remediation Program on December 30th 2025. At the time of enrollment, a Comprehensive Site Investigation/ Remedial Objectives Report/Remedial Action Plan combination report was submitted and has a review deadline of March 30th 2026. The determination of if additional site assessment is needed will be completed upon review of the combination report and an updated letter will need to be requested prior to June 15th 2026.*" If additional site characterization is necessary, Winnebago County will work with partners to complete prior to June 15, 2026.

**10. Enforcement or Other Actions:** Winnebago County, through the County's Trustee program, has owned the site since October 2020. No known enforcement or other actions have been identified.

**11. Sites Requiring a Property-Specific Determination:**

The 1800 Broadway Site does not require a property-specific determination based on review Section 1.5 in the Information on Sites Eligible for Brownfields Funding under CERCLA 104(k) of the FY26 Guidelines for Brownfield Cleanup Grants.

**12. Threshold Criteria Related to Exception to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability:**

**b.) Property Acquired Under Certain Circumstances by Units of State and Local Government**

**(i) (3) Exemptions to CERCLA Liability:** The site parcel meets the exemption requirements for asserting an affirmative defense to CERCLA liability through state and local units of government that acquired ownership or control of a property by any of the circumstances listed below and did not cause or contribute to the release or threatened release of a hazardous substance at the property, are exempt from liability for any previous contamination at that property per CERCLA § 101(20)(D), as demonstrated through the following subsections.

- **Information on the Property Acquisition:** Winnebago County, acquired the parcel through tax delinquency.
- **Date of Property Acquisition:** Winnebago County, acquired the parcel on October 23, 2020.
- **Timing of Hazardous Substance Disposal:** All disposal of petroleum products and hazardous substances at the site occurred prior to Winnebago County acquiring the property.
- **Cause or Contribute to Hazardous Substances:** Winnebago County has not caused or contributed hazardous substance to the site at any time.
- **Contribution of Hazardous Substance Disposal:** Winnebago County has not contributed or arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site at any time.

**13. Cleanup Authority and Oversight Structure:**

**a. Describe how you will oversee the site:**

Winnebago County has enrolled the site into the Illinois EPA voluntary Site Remediation Program (SRP) with the intention of obtaining a No Further Remediation (NFR) letter relating to the identified subsurface impacts. Accordingly, the numerical cleanup objectives for subsurface

contamination are the TACO remediation objectives for residential, industrial/commercial, and construction worker receptors.

**b. Provide your plan to acquire access to relevant adjacent or neighboring properties if necessary:** Access is readily available through public right -of-ways and ingress/egress to the west and south.

#### **14. Community Notification:**

##### **a. Draft Analysis of Brownfield Cleanup Alternatives**

A draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the project site. Winnebago County made the draft ABCA available to the public for review and comment on January 19, 2026. The draft ABCA and draft Cleanup Grant Application were available for review at 127 N. Wyman Street, Suite 100, Rockford, Illinois 61101 and on the Region 1 Planning Council website: <https://r1planning.org/>. The draft ABCA is included in this grant submittal.

##### **b. Community Notification Ad**

Winnebago County published a community notification advertisement in the local newspaper, the Rockford Register Star, on January 14, 2026. This ad indicated the following:

- that a copy of Winnebago County's grant application, including the Draft ABCA, is available for public review and comment;
- how to comment on the draft application;
- where the draft application is located (with Winnebago County Trustee representative at 127 N. Wyman Street, Suite 100, Rockford, Illinois 61101 and on Region 1 Planning Council's website); and
- the date and time of a public meeting (January 19, 2026, 11:00 a.m.)

The Certificate of Publication from the local newspaper for the community notification ad is included in this grant submittal.

##### **c. Public Meeting**

Winnebago County held a Public Meeting on January 19<sup>th</sup> at 11:00 a.m. to discuss the draft application and consider public comments on the application and project. From the Public Meeting, Winnebago County is including the following in their grant application submittal:

- the comments or a summary of the public comments received;
- the applicant's response to those comments;
- meeting notes or a summary of the public meeting;
- meeting sign-in sheet

**d. Submission of Community Notification Documents**

Winnebago County has included the items listed below in their Cleanup Grant application submittal to US EPA:

- a copy of the draft ABCA
- a copy of the ad that demonstrates notification to the public and solicitation for comments on the application
- the comments or a summary of comments received
- the applicant's response to those public comments
- meeting notes or summary from the public meeting
- meeting sign-in sheets

**15. Named Contractors and Subrecipients:**

Not Applicable.



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2520 WEST ILES AVENUE, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JAMES JENNINGS, ACTING DIRECTOR

217/785-8726

1/22/2026

Winnebago County  
ATTN: Marlana Dokken  
404 Elm Street  
Rockford, IL 61101

**Subject: State Acknowledgement Letter for Winnebago County  
FY2026 US EPA Brownfield Cleanup Grant Application**

Dear Marlana Dokken,

The Illinois Environmental Protection Agency (Illinois EPA) has received your request for a letter of acknowledgement for an upcoming Cleanup Grant application to U.S. EPA. Winnebago is applying for a \$ 3,635,900 Cleanup Grant.

The grant will be a Cleanup Grant for Hazardous Substances and will be used on a site located at 1800 Broadway Rockford, IL 61107. The site enrolled in the State of Illinois Site Remediation Program on December 30<sup>th</sup> 2025. At the time of enrollment, a Comprehensive Site Investigation/ Remedial Objectives Report/Remedial Action Plan combination report was submitted and has a review deadline of March 30<sup>th</sup> 2026. The determination of if additional site assessment is needed,<sup>1</sup> will be completed upon review of the combination report and an updated letter will need to be requested prior to June 15<sup>th</sup> 2026.

Illinois EPA acknowledges Winnebago County's efforts to obtain federal Brownfields funds for this project. If you have any questions, I may be contacted at the above address or telephone numbers below, or at [Jacob.fink@illinois.gov](mailto:Jacob.fink@illinois.gov) .

Sincerely,

Jacob Fink  
Brownfield Program Administrator  
Bureau of Land/Office of Site Evaluation  
Office# (217) 785-8726  
Cell# (217) 986-0818  
[Jacob.fink@illinois.gov](mailto:Jacob.fink@illinois.gov)

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<sup>1</sup> Note, applicants selected for funding that indicate that additional assessment is needed must submit updated information to the appropriate State or Tribal Environmental Authority and request an updated letter indicating that the site(s) has had a sufficient level of site characterization for remediation to begin. Applicants must provide EPA with the updated letter by June 15, 2026. If applicants do not meet this requirement by June 15, 2026, EPA may not make the award due to a failure to meet this requirement.

2125 S. First Street, Champaign, IL 61820 (217) 278-5800

115 S. LaSalle Street, Suite 2203, Chicago, IL 60603

1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120

9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000

595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200

412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022

4302 N. Main Street, Rockford, IL 61103 (815) 987-7760