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**City of Rockford, Illinois**  
**Brownfield EPA Assessment Cooperative Agreement Work Plan**  
**Community-Wide Assessment Grant**

Project Period: July 1, 2025 – September 30, 2029

This project supports the assessment of brownfield properties for future use and redevelopment. The focus of this grant will be to support complex redevelopment projects by providing better information to remove uncertainty surrounding site conditions; developing re-use plans that provide direction, detail, and budgets for redeveloping and using sites safely; and aligning resources that carry redevelopment beyond the assessment and planning stages.

CDFA: 66.818

CERCLA Authority: 104(k)

## INTRODUCTION

The United States Environmental Protection Agency (US EPA) has awarded a \$500,000 Community-Wide Brownfields Assessment grant for the assessment of sites. The City of Rockford, Illinois, has the necessary tools and procedures to immediately begin implementation of the grant and meet key project objectives within the performance period of the grant.

An ongoing brownfields inventory maintained by the City of Rockford has identified approximately 930 brownfield sites. Using this inventory along with the City's Comprehensive Plan, community input, and other adopted strategic framework has prioritized the following two targeted areas.

**Target Area 1 – Keith Creek Greenway:** Keith Creek flows southwest through Rockford, ultimately flowing into the Rock River at the western limits of Target Area 1. Upstream, the creek travels through historically rural areas. Upon entering the Target Area, the creek becomes heavily channelized, with the surrounding land uses transitioning to densely urbanized neighborhoods and failed industry. The final 2.4-mile stretch flows through some of Rockford's most historically disadvantaged neighborhoods. The Keith Creek Greenway faces several challenges, including severe and persistent flooding, poor water quality, mobility and transportation barriers, commercial vacancies, and lack of community access to the creek for recreation. Some of Rockford's earliest industries established along the creek and were served by railroad. Persistent flooding contributed to industrial failure along the creek and left behind several brownfields. After back to back 100-year flood events in 2006 and 2007, the City began the buyout and demolition of over 130 flood damaged homes and businesses in the Creek's flood plain for a planned engineering project to reduce flooding, improve greenspace and resident connectivity, restore social equity, and return the Creek's natural features. Before improving drainage and restoring recreational access, environmental assessments are needed to screen for environmental hazards. The following priority sites have been selected in the Keith Creek Greenway for assessment.

- **Sites 1 and 2** are separate City-owned parcels divided by Keith Creek, formerly occupied by the Highland Lumber & Fuel Company from the 1920s to the 1970s. The City has performed Phase I ESAs on both sites along with preliminary Phase II ESAs. However, due to limited funding at the time of the Phase II ESAs, more comprehensive Phase II ESAs are needed to fully characterize the site and assist with cleanup planning in

the corridor. North of the creek is Site 1, addressed as 2233 Charles Street. Site 1 is currently vacant and most recently contained blighted and vacant shopping plaza demolished by the City in June 2024. Site 1 is 1.7 acres and once operated as the lumber mill portion of the business and contained a gas station. Contaminants of concern include arsenic, copper, and chromium from the treatment and milling of lumber, polynuclear aromatic hydrocarbons (PNAs), and petroleum from the former gas station. Site 2 is located south of the creek at 2222 7<sup>th</sup> Avenue and once operated as the bulk petroleum sector of the business. Various grades of heating oils were unloaded from rail tankers into a network of 5,000 to 10,000 gallon aboveground tanks, before being pumped into tanker trucks for home delivery. The 1.8-acre parcel is vacant and contains a partially collapsed oil warehouse that is set for demolition in July 2025. Contaminants of concern include petroleum related Volatile Organic Compounds (VOCs) and PNAs. Sites 1 and 2 are identified as key catalytic sites for flood mitigation and generating holistic community benefit by a 2022 Keith Creek Corridor Study.

- **Site 3** is the former Custom Gear & Machine parcel at 1718 7th Ave. The 1-acre parcel abuts Keith Creek and contained machine shops that operated from circa 1913 until the City's purchase and demolition in 2008. A 2008 Phase I ESA identified several Recognized Environmental Conditions (RECs), including former Underground Storage Tanks (USTs), industrial machining, and the railroad. The report details the presence of petroleum contamination encountered during abandonment of a former UST in 1993. Contaminants of concern for the property are VOCs, PNAs, heavy metals, and polychlorinated biphenyls (PCBs). The assessment and cleanup of these sites will positively impact the Greenway by promoting new investment, enhancing mobility, reducing flood events, and restoring public access to the creek.

**Target Area 2 – South Main Street Corridor:** Main Street follows the Rock River through Rockford and was once a thriving center for businesses and industry. Business along the highway prospered, as it was once a primary transportation route between Illinois and Wisconsin. This changed in the late 1950s, with the completion of Interstate 90 and the Highway 20 bypass that routed highway traffic around the City and away from its urban core. Significantly reduced traffic paired with a declining industrial sector led to a blighted corridor that still serves as the primary southern entry route to a rising downtown district. West of S. Main Street is a large residential area negatively impacted by corridor blight and vacancies as a result of historic redlining, increased dilapidated housing, and lack of economic opportunities. Stressed social, environmental, and economic conditions remain present as a direct result of the large number of brownfields in close proximity. Brownfields Assessment Grant funds are needed to complete the initial environmental assessments in the corridor, which will lead to cleanup and future redevelopment to reverse the negative conditions plaguing the target area. The following priority sites have been identified for assessment in the S. Main Street Corridor.

- **Site 1** is a 33-acre cluster of parcels known as the Barber Colman North Area and contains of a mixture of blighted and underutilized commercial and industrial buildings. Site 1 is bound by S. Main Street to the west, Loomis Street and the Canadian National Railroad to the south, and Kent Creek and the Rock River to the north and east. Past and current land uses include manufacturing, dry cleaning, foundry, automotive repair, and gas stations. Redevelopment planning has recently shifted to the Barber Colman North Area as the next high-priority development site due to its location being immediately north of the recently commenced \$450+ million Colman Yards redevelopment project. The Colman Yards project includes the adaptive reuse of nine historic buildings across 25 acres. Site 1 is inventoried but no assessment work has been completed. Phase I and II ESAs are needed to determine if cleanup is necessary before redevelopment can move forward.
- **Site 2** is approximately 29-acres in size and is known as the S. Main Rail Yards. Bound by Kent Creek and Winnebago Street to the west, most of Site 2 is flood plain but the frontage portion along S. Main Street is prime for redevelopment. The Union Pacific Railroad spans the north perimeter. Beginning in the 1870s, a network of railroads and industry once operated here. The northern parcels are owned by the City and were assembled in the 1990s. The City is actively pursuing acquisition of the southern portion, which is currently owned by the Canadian Pacific Railroad. In July 2023, the State of Illinois formally announced the 2027 return of Metra passenger rail from Rockford to Chicago on the north adjacent Union Pacific line, positioning Site



2 as the most viable location for a planned commuter rail station. It is crucial that Phase I and II ESAs be completed throughout Site 2 to evaluate for contaminants of concern (VOCs, PNAs, PCBs, heavy metals) and perform the necessary cleanup planning prior to site design and construction of the station.

Subsequent reuse of sites in the target areas will greatly benefit the region. Similar criteria and benefits will also apply to nonpriority sites in the area and community-wide. The City has found that It is important to be flexible with Assessment Grant funds and understands that non-target area brownfield sites may become a priority over the life of the grant. Many factors may contribute to the rise of these unforeseen priority sites, including development interest, leveraged public/private resources, community need, and/or potential negative impacts to residents from contaminated sites. Additionally, State and local government infrastructure improvement project in major transportation corridors can also reprioritize sites in an effort to encourage reinvestment in these areas. Some of these potential sites and corridors that may be given new priority over the course of the grant include:

- N. Main Street Corridor and the former Essex Wire Plant (2816 N Main Street)
- Auburn Street Corridor
- W. State Street Corridor
- 11<sup>th</sup> Street Corridor

Since 2000, the City of Rockford has demonstrated its ability to simultaneously manage \$16.9 million in US EPA Assessment, Cleanup, and Revolving Loan Fund grants, including seven (7) previous community-wide and one (1) site specific assessment grants. Rockford recognizes the value of addressing brownfields, and employs a full-time Brownfields Redevelopment Specialist (BRS) to maintain an aggressive approach. Assessing, cleaning up, and redeveloping brownfield sites in our community contributes to the environmental and economic well-being of our residents and is consistent with the City's 2040 Comprehensive Plan. This is accomplished by (1) understanding the conditions that make a site a brownfield (i.e., contaminated, blighted), (2) arriving at solutions for alleviating the brownfield conditions (i.e., cleanup, due care or continuing obligations, compatible reuse), (3) providing tools, resources, and incentives to implement the solutions, and (4) educating the community, allowing informed decisions on brownfield properties to eliminate or manage adverse conditions.

## MANAGEMENT AND COORDINATION

**Robert Wilhelmi**, BRS for the City of Rockford, will administer the FY26 EPA Assessment Grant. Mr. Wilhelmi will oversee the programmatic, administrative, and financial requirements of this grant along with all other brownfield grant-funded projects. Prior to leading the City's efforts, Mr. Wilhelmi worked as a private Environmental Consultant and spent 18 years working with municipal brownfield grant programs. Mr. Wilhelmi's additional responsibilities will include community engagement, grant reporting, budget management, and working with the procured Qualified Environmental Professional (QEP) to assist with the contractual grant funded tasks as outlined in the Project Tasks tables below.

Mr. Wilhelmi will work with **Michaela Harris**, the City's Contract & Grant Compliance Officer, to implement the City's overall Grants Policy and to monitor compliance with grant conditions. Central Services Manager **Anne Wilkerson** from the City's Finance Department will work with Mr. Wilhelmi to advertise and procure a QEP for the project and any additional eligible contract work exceeding \$10,000. QEP and other project invoices will be approved by the City's BRS and processed for payment by CED Fiscal Coordinator Jocelyn McLaughlin through the City's Accounts Payable Department. Grant draws will be requested by the City's BRS and completed by **Susan Peterson**, the City's Grants Accountant. **Barb Chidley**, the City's Neighborhood Specialist, will assist Mr. Wilhelmi with community outreach and engagement by taking a "boots on the ground" approach for engaging disconnected residents and to build and nurture trust and relationships with Rockford residents.

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## PROJECT TASKS

The following five (5) project tasks will be implemented to accomplish the goals of this grant.

Task 1 – Programmatic Activities
<p><i>i. Project Implementation:</i> The BRS will prepare and submit a project work plan, quarterly grant reports and ACRES property profiles, annual Federal Financial report, and a final grant closeout report. The BRS will work with the City's Central Services Manager to advertise and procure a QEP for the project. The BRS will update the running brownfields inventory to reflect new sites and remove others due to cleanup or redevelopment. The inventory is available to the public as a layer on the City's open data site <a href="https://rockford-il.toilemi.com/">https://rockford-il.toilemi.com/</a>. The BRS will work with the City Legal Department to use its brownfields prevention ordinances to induce owners of contaminated properties to assess and/or cleanup. The BRS will review and approve all contractor invoices for payment through the City's Accounts Payable Department. Grant draws will be completed by the City's Grants Accountant quarterly. All City employee time associated with these programmatic activities will be in-kind as a contribution to the grant. Grant funded items in Task 1 include the City's BRS attending two (2) future National Brownfields Conferences during the life of the grant.</p>
<p><i>ii. Anticipated Project Schedule:</i> We anticipate the project to span the 4-year life of the grant. In order to begin work upon issuance of the Cooperative Agreement, advertising and procurement of QEP will take place in Summer 2025 using the Federal Procurement Regulations. Quarterly Reports, Property Profiles, and grant draws will be submitted within 30 days after the end of each FY quarter. Annual Financial Reports will be completed by 10/31 of each FY with a final Financial and Closeout Reports within 90 days of the grant expiration date.</p>
<p><i>iii. Task/Activity Lead:</i> City Staff as detailed in the preceding Management and Coordination and Project Implementation sections.</p>
<p><i>iv. Outputs:</i> The City's brownfields inventory will remain up to date. Quarterly Reports and Property Profiles will be updated and submitted via US EPA's ACRES. Federal Financial reports will be submitted annually along with a final Financial and Closeout Reports. Two National Brownfields Conferences will be attended by the City's BRS.</p>

Task 2 – Community Engagement
<p><i>i. Project Implementation:</i> The City's BRS will maintain the Brownfields Revitalization website, generate social media updates, and present status updates at neighborhood, ward meetings, and special interest meetings. The BRS will work directly with the City's Neighborhood Specialist to provide program updates and seek input at street-level to reach disconnected individuals. All community engagement will be completed as in-kind and not charged to the grant. Community engagement of residents and stakeholders in combination with the City's brownfields inventory and Comprehensive Plan will be used to prioritize sites.</p>
<p><i>ii. Anticipated Project Schedule:</i> Comprehensive Community Engagement is constant for the City's brownfields program and does not stop or start for specific grants. Specific updates for the Target Areas will be provided to all residents when assessment or cleanup milestones occur.</p>
<p><i>iii. Task/Activity Lead:</i> City Staff as detailed in the preceding Management and Coordination and Project Implementation sections.</p>
<p><i>iv. Outputs:</i> The City's Brownfields Revitalization website will remain up to date. At a minimum, we anticipate one in-person neighborhood/business group meeting will be attended and one brownfield related social media post will occur per month throughout the life of the grant. Street level outreach will continue in the Target Areas and in the vicinity of newly identified sites.</p>

### Task 3 – Eligibility Determinations, Phase I and II Environmental Site Assessments

**i. Project Implementation:** Once a site is selected for assessment, an Eligibility Determination (ED) will be submitted to the assigned US EPA Project Manager Hazardous Substance sites and the Illinois EPA for Petroleum Sites. To preserve funding for valuable Phase I and II ESA work, the City's BRS will prepare and submit all EDs as in-kind. Once a site is deemed eligible, the City's QEP will perform the Phase I ESA using grant funds, which will be prepared in accordance with the ASTM E1527-21 standard, demonstrating that the All Appropriate Inquiry has been met. The Phase I ESAs will identify Recognized Environmental Conditions (RECs) that warrant media (soil, groundwater, soil gas, building materials) sampling through a Phase II ESA as described under Task 4.

A US EPA Quality Assurance Project Plan (QAPP) will be developed to establish standard operating procedures for media sampling and laboratory analysis. Once the QAPP is approved by US EPA, a Phase II ESA may be completed to sample soil, groundwater, soil gas, or building materials that were identified as RECs in the Phase I ESAs. A US EPA approved Health & Safety Plan (HASP) and a site-specific Sampling and Analysis Plan (SAP) will precede the Phase II ESA field work. The QAPP update, HASP, SAPs, and Phase II ESAs will be completed using grant funds by the QEP.

**ii. Anticipated Project Schedule:** EDs and Phase I ESAs will be ready to commence as of 10/1/2025 and will be completed throughout the life of the grant. Completion and execution of a QAPP and HASP by 12/31/2025. SAPs and Phase II ESAs to commence immediately upon US EPA's approval of the QAPP and HASP and will be carried out throughout the life of grant.

**iii. Task/Activity Lead:** The City BRS will complete all EDs and the QEP will complete all Phase I ESAs as a contractual budget items for this project. The City's QEP will complete the QAPP, HASP, SAPs and Phase II ESAs as a contractual budget item for the project.

**iv. Outputs:** We anticipate an output of approximately 25 EDs and 25 Phase I ESAs. Please note that the final number may be reduced as a result of assessing atypically large or complicated sites at a greater cost. An updated QAPP and HASP will be completed in accordance with grant requirements. A total output of 12 Phase II ESAs are anticipated for the project (6 priority sites and 6 additional sites). Please note that the final number may be reduced as a result of assessing atypically large or complicated sites at a greater cost.

### Task 4 – Cleanup Planning

**i. Project Implementation:** Phase II ESA sites with contamination and high redevelopment potential in the near future will be enrolled in the Illinois EPA's voluntary cleanup program, the Site Remediation Program (SRP). Once a site has been fully assessed per SRP protocol, a Remediation Objective Report and Remedial Action Plan (ROR/RAP) outlining the proposed cleanup methods and technologies will be submitted. For sites not requiring physical cleanup, a Remedial Action Completion Report (RACR) may be combined with the ROR/RAP that summarizes all cleanup standards have been met. The SRP is a fee-based program, where the Illinois EPA charges at an hourly rate for regulatory report reviews and communications by an assigned project manager. ROR/RAP and SRP project management fees will be charged to the City directly and paid for by the grant.

**ii. Anticipated Project Schedule:** Upon completion of site assessment activities, we anticipate the first ROR/RAP to be submitted by 7/1/2026, with the remaining reports spanning the life of the grant.

**iii. Task/Activity Lead:** The City's QEP will complete and submit the ROR/RAPs. The Illinois EPA will perform report reviews and other SRP oversight. If contaminated sites are identified where there may be an exposure risk to residents, the City's BRS will work with the Winnebago County Health Department for health monitoring and education as in-kind services.

## BUDGET

The following table outlines the proposed budget costs, with estimates based on the typical costs incurred while managing 7 prior US EPA Community-Wide Assessment Grants.

	Budget Categories	Task 1 Prog. Activities	Task 2 Com. Engagement	Task 3 Phase I and II ESAs	Task 4 Cleanup Planning	TOTAL
Direct Costs	Personnel	-	-	-	-	-
	Fringe Ben.	-	-	-	-	-
	Travel	\$3,000 <sup>a</sup>	-	-	-	\$3,000
	Equipment	-	-	-	-	-
	Contractual	-	-	\$382,000 <sup>bc</sup>	\$100,000 <sup>d</sup>	\$482,000
	Other	-	-	-	\$15,000 <sup>e</sup>	\$15,000
	Tot. Direct Costs	\$3,000	-	\$382,000	\$115,000	\$500,000
	Indirect Costs	-	-	-	-	-
	<b>Total Budget</b>	<b>\$3,000</b>	<b>-</b>	<b>\$382,000</b>	<b>\$115,000</b>	<b>\$500,000</b>

<sup>a</sup>Cost includes travel and lodging for the City's BRS attending 2 future National Brownfields Conferences during life of grant.

<sup>b</sup>Cost includes 25 Phase I ESAs being completed at an average cost of \$3,000 per site. \$75,000 total for Phase I ESAs

<sup>c</sup>Cost includes \$5,000 for an updated QAPP and \$2,000 for HASP (\$7,000 total). An estimated \$180,000 is budgeted for Phase II ESAs for the 6 sites (\$30,000 ea.) and \$120,000 for 6 additional sites (\$20,000 each). \$307,000 total for Phase II ESAs

<sup>d</sup>Cost includes 5 sites enrolled into Illinois EPA SRP with ROR/RAP reports for \$20,000 per site (\$100,000 total).

<sup>e</sup>Illinois EPA SRP project management and regulatory oversight fees for 5 sites at \$3,000 per site (\$15,000 total).

## MEASURING SUCCESS

The City of Rockford will track, measure, and evaluate progress in achieving outputs and outcomes throughout the grant program. Output tracking will include the number of community engagement efforts, Eligibility Determinations, Phase I and II ESAs, and Cleanup Plans (ROR/RAPs) funded by the grant. Electronic copies of all final Phase I, Phase II, and cleanup planning documents will be provided to the US EPA Project Manager upon request. All progress and will be tracked and documented within each Quarterly Grant Report and US EPA's ACRES database.

For individual sites, contaminants of concern will be identified and documented if concentrations are detected above applicable action levels using ACRES. ACRES will also be used to document any engineering and/or institutional controls utilized for cleanup sites. For assessment and cleanup sites undergoing redevelopment, ACRES will track individual site outcomes, including leveraged redevelopment accomplishments, number of environmental cleanup and redevelopment jobs, and post redevelopment land use(s).

## PREAPPROVAL FOR USE OF GRANT FUNDS

The City of Rockford is requesting to incur costs for the grant funds prior to the September 1, 2025 start date For Phase I ESAs and to travel and attend the 2025 National Brownfield Conference held in Chicago, Illinois from August 5 - 8, 2025. The estimated costs associated with pre-cooperative agreement Phase I ESAs is \$9,000 for 3 Phase I ESAs and will be included under Task 3 of prior listed budget.

The assessment grant budget includes a line item for \$3,000 for travel and accommodations for two (2) future conferences (\$1,500 per conference). The City's Brownfield Redevelopment Specialist will be attending on behalf of the City and presenting at the 2025 Conference. Cost estimates for the 2025 Conference are as follows:

Conference Cost Items	Rate
Conference Registration	\$ 275.00
Lodging (3 nights)	\$ 606.00
Travel (190 miles X 0.70 per mile)	\$ 133.00
Per Diem (Meals)	\$ 322.00
Misc. (Parking, etc.)	\$ 149.00
Highway Tolls	\$ 15.00
<b>Total</b>	<b>\$ 1,500.00</b>