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**December 1, 2021**

**RE: FY2022 USEPA Brownfields Revolving Loan Fund Grant Application**

Prairie Hills Resource Conservation and Development, Inc. (Prairie Hills) is pleased to submit this proposal for FY2022 Brownfields Revolving Loan Fund (RLF) Grant funding. Information requested in the grant application guidelines is provided below.

**1. Applicant ID:** Prairie Hills Resource Conservation and Development, Inc.

**2. Federal Funds Requested**

**a. Grant Type:** Individual RLF

**b.i. Federal Funds Requested:** \$1,000,000

**b.ii. Cost Share Waiver:** Not requested.

**3. RLF Boundaries:** Fulton, Hancock, Henderson, Knox, McDonough, and Warren Counties, Illinois with Target Areas and/or Priority Sites in the cities of Canton, Galesburg, Macomb, and Monmouth

**4. Target Area and Priority Site Information**

**a. Target Areas (TAs) and Census Tracts (CTs):** The **South Canton TA** includes portions of Fulton County, IL (CTs 9534, 9535, and 9536); the **South Galesburg TA** includes portions of Knox County, IL (CTs 8, 9, 10, and 11); the **West Central Macomb TA** includes portions of McDonough County, IL (CTs 104 and 105); the **Southwest Monmouth TA** includes portions of Warren County, IL (CT 8705).

**b. Addresses for Priority Sites:** **Former International Harvester Plant site** (260 E. Elm St., Canton, IL 61520); **1309 Grand Avenue site** (1309 Grand Ave., Galesburg, IL 61401); **Former Haeger Pottery site** (411 W. Calhoun St., Macomb, IL 61455); **Former Monmouth Plow Co. property** (620-632 S. Main St., Monmouth, IL 61462).

## 5. Project Contacts

### 6. Population of Target Area Cities:

Canton (13,682);  
Galesburg  
(30,689); Macomb  
(17,857),

Monmouth (8,763); all data are American Community Survey 5-year estimates (2015-19).

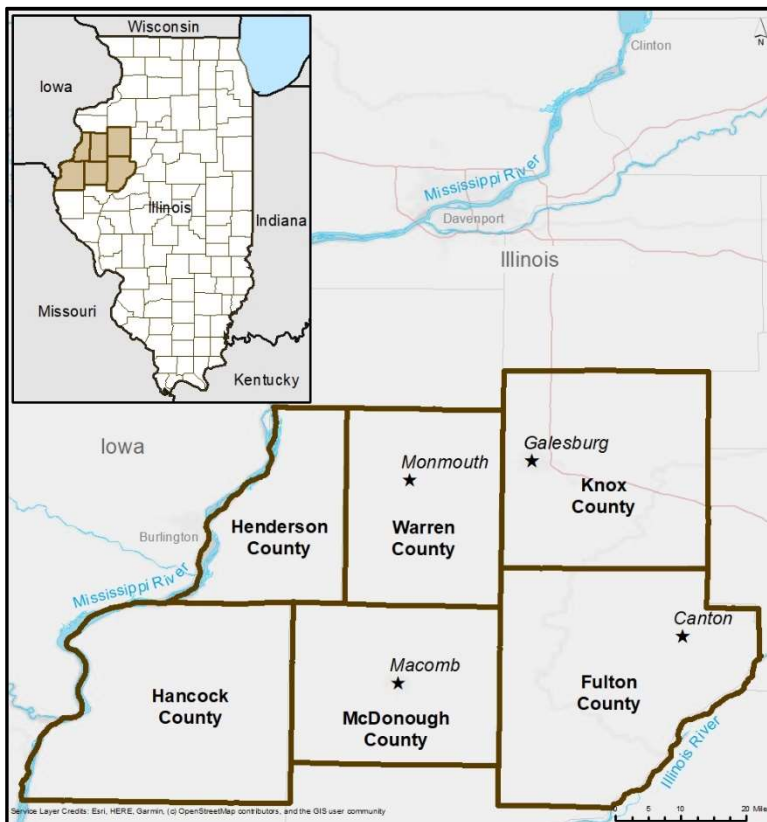
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Prairie Hills Resource Conservation & Development, Inc. (Prairie Hills) is regional economic development and conservation organization, established in 1976, with a six county “**jurisdictional area**” in west central Illinois that includes Fulton, Hancock, Henderson, Knox, McDonough, and Warren counties. This jurisdictional area covers 3,945 square miles of land and has a population of 158,017. We are a high-performing current USEPA brownfields assessment grantee, having just completed implementation of a \$600,000 USEPA Coalition Assessment Grant awarded in FY2018. The initial grant was used to support a coalition that included four of our counties (Fulton, Knox, McDonough, and Warren) and two of our four largest cities (Macomb and Monmouth) as formal coalition members. However, funding was made available to communities throughout the six-county area, which contains 68 incorporated cities and villages – all but three of which have populations <10,000 residents.



The FY2018 grant highlighted the need for a local source of funding to support cleanup of brownfields sites. One key outcome from the initial grant was recognition by representatives on our Brownfields Advisory Committee of the need for a long-term program to revitalize and redevelop brownfields and build on the collaborative approach established through the FY2018 grant project. To implement this vision, Prairie Hills is in the initial stages of efforts to establish and lead a regional land bank to support this effort and through which additional legal and financial tools will be available to address tax delinquent brownfields that are currently enmeshed in a dysfunctional tax deed sale process. FY2022 funding will be a vital initial source of funding to be used to further build our program as we work towards establishing the land bank, and which we anticipate will become the first multi-county entity of this type in Illinois with a specific focus on brownfields revitalization.

Redevelopment challenges within our region are immense due to the small size and declining populations of our, the long-term declines in our major industries, the distance and relative isolation of our region from major metropolitan areas, and the extremely weak financial condition of the State of Illinois. Despite these challenges, we had significant successes with our initial (FY2018) USEPA Assessment Grant, with over 60 parcels

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identified/prioritized; eligibility confirmed, and access secured for 35 sites; and site-specific assessment or reuse planning activities completed at 31 sites, in a total of 8 cities, and within 5 of our 6 counties. Anticipated outcomes are being achieved. For example, in Canton, a \$2.5 million Arby's restaurant construction is planned for the Spring of 2022 on a former gas station site that closed in the 1960s. In addition, the City of Canton purchased two parcels that were part of a remediated former manufactured gas plant site and a former bulk fuel depot. Both sites are currently being used by the City as public works facilities. In Galesburg, a grocery store (and LUST site) vacant/unoccupied and for sale for 12 years, was sold and is being redeveloped as a storage facility. In Macomb, the owner of a major pottery complex closed since 2004 participated in a reuse planning study and subsequently self-funded abatement and demolition of the complex in 2020. The owner is actively collaborating with the City of Macomb to create a new city park in fulfillment of the reuse plans. In Monmouth, the city acquired a vacant and partially collapsed former dairy building, demolished the building with \$70,000 provided by a local foundation, and redeveloped the site for parking and greenspace for the downtown library. Also in Monmouth, a former boat factory vacant and for sale since 2006 was sold to a local entrepreneur. In the City of Carthage, a former classroom building is being demolished to construct expanded facilities for a regional theatre, in fulfillment of a reuse plan developed using USEPA funds.

We look forward to continuing these successes and the highly effective regional collaboration approach used for the initial grant.

## 7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	See narrative p. 1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority site(s) is impacted by mine-scarred land.	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; or will incorporate energy efficiency measures.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	See narrative p. 3
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	See narrative p. 1

N/A = Not applicable

**8. Letter from the State or Tribal Environmental Authority:** A letter of acknowledgement from the Illinois EPA is attached (**Attachment A**).

**9. Releasing Copies of Applications:** The application does not contain confidential, privileged, or sensitive information.



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/524-2084

November 18, 2021

Prairie Hills Resource Conservation  
Attn: David King  
321 W. University Drive  
Monmouth, IL 61455

Dear Mr. King,

The Illinois Environmental Protection Agency (Illinois EPA) has received your request for a letter of acknowledgement for an upcoming Revolving Loan Fund application to the US EPA. Prairie Hills Resource Conservation & Development, Inc. is applying for a \$1,000,000 Revolving Loan Fund.

The Revolving Loan Fund will be for Petroleum and Hazardous Substances.

Illinois EPA acknowledges Prairie Hills Resource Conservation & Development, Inc. efforts to obtain federal Brownfields funds for this project. If you have any questions, I may be contacted at the above address or telephone number, or at [Jenessa.N.Conner@illinois.gov](mailto:Jenessa.N.Conner@illinois.gov).

Sincerely,

A handwritten signature in cursive script that reads "Jenessa Conner".

Jenessa Conner, Project Manager  
Voluntary Site Remediation Unit  
Remedial Project Management Section  
Division of Remediation Management  
Bureau of Land

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412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

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

### **1.a. Target Area & Brownfields**

**1.a.i. Background & Description of Target Area.** Prairie Hills Resource Conservation & Development, Inc. (Prairie Hills) is a regional non-profit economic development and conservation organization, established in 1976, that serves a 3,945-square mile area in western Illinois and includes 6 counties (Fulton, Hancock, Henderson, Knox, McDonough, and Warren) as well as 68 cities and villages – all but 3 of which (Galesburg, Macomb, and Canton) have populations under 10,000 residents. Nutrient-rich silt overlying shallow bedrock with thick coal seams gave rise to the initial dominant economic drivers of the region: agriculture and coal mining. After World War II (WWII), the United States (US) farm industry saw an explosion in production driven by new farming technology. Nearby large cities, including Moline (home to John Deere), Peoria (Caterpillar) and Chicago (International Harvester), served as farm equipment manufacturing hubs with many smaller manufacturing facilities located within the Prairie Hills region (including two of our priority sites). However, by the end of the 1970s, several crises ended the post-WWII growth period and brought new economic and social challenges to the region. The net result to the region has been a **combined loss of over 16,000 jobs in agriculture, mining, and manufacturing since 1980 and a 16% decline in population.**

The decline in the coal mining industry has been absolute. By 1992, the region was down to only 4 active coal mines which employed fewer than 240 combined workers. In 2012, the last coal mine closed, and in December 2019, the last coal-burning power plant in the region also closed leaving behind 2 large coal ash impoundments<sup>1</sup>. However, the legacy of coal mining remains with 1,069 known abandoned or inactive mine sites and 114 square miles of land permanently scarred by strip mining. The decline in manufacturing is more recent, with manufacturing jobs in the 6-county area dropping from 19,582 in 1980 to 9,400 in 2018.

**Target Area Descriptions:** US Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) grant funding will be used to continue a successful brownfields program launched and initially funded through a Fiscal Year 2018 Community Wide Assessment (CWA) grant awarded to Prairie Hills. Approximately 50% of the FY2022 RLF cleanup grant funding will be allocated to projects in 4 target areas (TAs) located in the region's 4 largest cities: 1) the **South Canton TA** in Canton, 2) the **South Galesburg TA** in Galesburg, 3) the **West Central Macomb TA** in Macomb, and 4) the **Southwest (SW) Monmouth TA** in Monmouth. The FY2018 CWA grant focused on these same TAs which are all older commercial/industrial areas within or adjacent to historic downtowns, each of which contains dozens of brownfields. Each TA has been the focus of recent planning projects, and all have a variety of funding mechanisms in place (tax incremental finance [TIF] districts, Enterprise Zones [EZs], Opportunity Zones [OZs], and/or loan programs) that can be leveraged to advance cleanup and redevelopment of brownfield sites targeted for cleanup. In addition, the US Census Tracts (CTs) and Block Groups (BGs) within the TAs all have higher percentages of residents who are minorities and/or poor. Advancing redevelopment projects in the 4 TAs will not only benefit local residents who are subject to the greatest environmental justice (EJ) concerns (and most in need of jobs, services, and public amenities that can be developed on brownfield sites), but residents throughout the region for which these cities serve as key employment and services hubs. The other 50% of grant funding will be focused on sites in the 64 smaller communities, all of which lack the financial, technical, and/or administrative resources to effectively spur the redevelopment of brownfield sites. This dual focus is a key strategy for leveraging the greatest positive impacts from the grant for both large and small communities throughout the region.

**1.a.ii. Description of Priority Brownfield Site(s).** Based on an initial inventory completed for the FY2018 CWA grant, several thousand brownfields are present in the 6-county area, including at least 1,069 former mine sites, over 1,000 former gas stations, an estimated 100-150 former schools, and 100 or more former industrial facilities. The types of sites nominated for the FY2018 CWA grant included 15 dilapidated buildings (former restaurants, stores, dry cleaners, theaters, and hotels), 12 auto related sites (i.e., former gas stations, auto repair shops, or auto dealerships), 6 former manufacturing facilities, and 5 former public facilities (i.e., schools, a fire station, and a jail). Details for 4 priority sites are provided below.

**Former International Harvester (IH) Plant (260 E. Elm St., Canton, Fulton Co.):** This 33-acre former manufacturing/assembly plant site is the largest brownfield in the **South Canton TA**. The plant manufactured farm implements and equipment from 1850 to 1983, when it closed eliminating nearly 3,000 jobs. Most of the complex was destroyed by an arson fire in 1997. Over the past 24 years, the City of Canton has expended over \$6 million (M) on assessment, demolition, and cleanup, which has resulted in the successful redevelopment of the eastern portion of the site for a medical equipment manufacturer. However, the western 11-acres remains vacant with residual contaminants that include solvents, petroleum, lead, and other metals. It is anticipated that the final remedial activity required for closure (an engineered cap) can be most cost effectively implemented in conjunction with a redevelopment project. Two proposals have been made for senior housing developments, but neither advanced due to brownfields issues.

**1309 Grand Avenue (Galesburg, Knox Co.):** This 1.1-acre site, located in the **South Galesburg TA**, includes 4 parcels that have been vacant since at least 2005. The west parcel is a former gas station and leaking underground storage tank (UST) site that operated from the 1950s through 1999, when 4 USTs were removed. The other parcels were historically occupied by residences but have been vacant lots for 30 or more years. Suspected contaminants include residual lead and petroleum impacts at the former gas station and potential asbestos and lead based paint in soil from former site buildings. The site is one of 4 sites identified in the City's 2019 Comprehensive Plan update as a priority redevelopment site within the "Grand Avenue" planning subarea and

<sup>1</sup> Duck Creek Power Station in Canton, IL

includes 250 feet of frontage on US Highway 150. The already fully vacant site has the potential to serve as an initial catalyst site for desired new commercial, residential, and mixed-used development along this corridor; however, reuse cannot occur without extensive remediation/cleanup efforts.

**Former Haeger Pottery (411 W. Calhoun St., Macomb, McDonough Co.):** This 3.9-acre site, located within the **West Central Macomb TA**, was a major pottery complex that operated for 120 years until closing in 2004. It is located adjacent to a residential neighborhood near the Western Illinois University (WIU) campus. Documented environmental concerns include arsenic, lead, and petroleum contamination in soil and groundwater. After years of inaction, in 2020-21, the owner demolished the buildings and participated in a reuse planning study for the site funded by the FY2018 CWA grant. The owner is currently conducting additional assessment activities, and reportedly will conduct cleanup necessary to secure closure from the IEPA, with a stated goal of eventually donating the site to the city for development of a “Haeger Memorial Park.” However, under Illinois law, the owner’s obligation for cleanup would be linked to the less restrictive standards associated with the current industrial zoning and additional cleanup would be required to enable conversion to a park and public access. The site is a priority for the City due to its large size, blighted condition, prominent location at a gateway to the WIU campus, and potential to be converted to a major community asset.

**Former Monmouth Plow Co. Property (620-634 S. Main St., Monmouth, Warren Co.):** This 6.5-acre, 6 parcel site is located within the **SW Monmouth TA**. Industrial site use dates back to at least 1871, when the Weir Plow Works began operations. By 1892, nearly the entire site was occupied by a 15-building manufacturing complex. A major fire reportedly occurred in 1895 destroying many of the buildings. In 1902, the Monmouth Plow Co. constructed a new 1- to 3-story brick factory in the northern portion of the site, followed in 1915 by a 4-story brick office/warehouse. These multi-story brick buildings with an estimated combined floor area of 77,000 square foot (SF) are still present at the site. The southern portion of the site contains several 1-story metal storage buildings with a combined floor area of approximately 44,000 SF. The southeast corner of the property contains a small (1,225 SF) former gas station and auto repair shop, that operated from at least the 1970s, and which was reported in 2000 to have a release from a 550-gallon waste oil UST, but for which no other records are on file. Use of the site for manufacturing purposes ended at least 50 years ago, and the site has since been used primarily for storage and office space. Potential environmental concerns include regulated building materials (RBMs) in the buildings, petroleum impacts associated with the former gas station, and arsenic, lead, polynuclear aromatic hydrocarbons, total petroleum hydrocarbons, and other contaminants associated with the former plow works. The site is a priority due to its large size, prominent location (at the south entrance to downtown Monmouth), and the significant reuse potential of the historic multi-story brick buildings with cleanup needed to address potential environmental concerns.

## **1.b. Revitalization of the Target Area**

**1.b.i. Reuse Strategy & Alignment with Revitalization Plans.** The reuse strategy or specific plans for the 4 priority sites are summarized on the table below.

**Former IH Plant Site:** It is desired for the western portion of the site to be redeveloped for a retirement or assisted living facility consistent with a recent (2017) development proposal. The development will advance a key land use objective in the Canton Comprehensive Plan (2008, p. 34) to “encourage infill residential development on vacant properties and redevelopment of underutilized or rundown properties to integrate new housing into existing neighborhoods.” The project, combined with past development on the eastern portion of the site, will support goals in the Central Canton Redevelopment Plan (2005) to redevelop this specific site as a mixed-use district.

**1309 Grand Avenue:** This site is identified as the “Locust and Grand” redevelopment site on pages 106-107 of the January 2019 Galesburg Comprehensive Plan<sup>2</sup>, with a stated redevelopment goal to “consolidate the 4 vacant lots at the corner of Haynor and Locust Streets and Grand Avenue and develop them as a larger multifamily building to help support the new commercial uses.” The site could likely accommodate a 20- to 25-unit building (assuming a 3-story apartment building), and thereby address a community need for healthy (i.e., “lead-free”) new housing.

**Former Haeger Pottery Factory:** 5 reuse options for the site were evaluated as part of an initial reuse study completed in 2021. The preferred park alternative includes a food truck court, a large open central lawn area, perimeter walking paths with a playground and art displays, a parking lot, and buffers or berms along the railroad right of way to the south and private residences to the northeast. Use as a park is compatible with the anticipated need to construct an engineered cap across much of the property, and is also consistent the Macomb Comprehensive Plan (2021)<sup>3</sup> as well as a Special Area Plan for the W. Jackson St. Corridor.

**Former Monmouth Plow Co.:** The 3- and 5-story brick buildings that front on Main Street are prime candidates for renovation and adaptive reuse. At least 4 acres of the property are vacant and suitable for a number of commercial or light-industrial uses. The project will advance key economic development goals in the City of Monmouth Comprehensive Plan<sup>4</sup> (p. 25) to “expand industrial development” and to “diversify its industrial base” as well as land use goals of “encouraging development on vacant, undeveloped or underutilized land” and “focusing development in areas where infrastructure currently exists.”

<sup>2</sup> [https://cms7files.revize.com/galesburg/Document\\_Center/Department/Administration/Goals%20&%20Priorities/Final%20Galesburg%20Comp%20Plan%20LO.pdf](https://cms7files.revize.com/galesburg/Document_Center/Department/Administration/Goals%20&%20Priorities/Final%20Galesburg%20Comp%20Plan%20LO.pdf)

<sup>3</sup> <https://cityofmacomb.com/wp-content/uploads/2021/05/City-of-Macomb-Comprehensive-Plan-Revised-CLEAN.pdf>

<sup>4</sup> <https://wirpc.org/wp-content/uploads/2018/01/MonmouthComPlan.pdf> (Objective 3 on page 25)

**1.b.ii. Outcomes & Benefits of Reuse Strategy.** Based on the previous 2017 proposal for an assisted living/memory care facility on 6 acres of the former **IH Plant Site**, this type of development would likely result in at least \$8M in private investment, create up to 50 construction jobs during the 12-month construction phases, and create between 30 to 50 full-time jobs with benefits. Development of a 20- to 25-unit apartment project on the **1309 Grand Ave.** would result in \$1.5 to \$2.5M in private investment (assuming a construction cost of \$75,000 to \$100,000 per unit), create 15-20 construction jobs over 8 months, and 1-2 direct permanent jobs. Renovation and adaptive reuse of the **Former Monmouth Plow Co.** historic brick buildings would likely result in \$4M of private investment (based on the 77,000-SF floor area and an assumed renovation cost of \$50/SF). This would result in 30-40 construction jobs over a 15-month period, and 25-50 new jobs. As detailed in Section 1.b.1, cleanup and redevelopment of the **Former Haeger Pottery Factory** would result in the creation of a major new neighborhood park, with amenities that would benefit residents throughout Macomb. All 4 of these projects would take place within the neighborhoods in the 6-county area that have some of the highest levels of economic distress, worst health conditions, and greatest environmental justice challenges. The projects would benefit these residents through enhanced job opportunities, improved access to healthy housing, and/or access to recreational amenities. The new buildings to be developed on the **IH Plant Site** and **1309 Grand Ave.** site will incorporate energy efficiency measures required by the Illinois Energy Efficient Building Act for new commercial and residential buildings construction.

### **1.c. Strategy for Leveraging Resources**

**1.c.i. Resources Needed for Site Reuse.** A key funding need for many of the sites and the communities is funding for abatement and demolition of dilapidated buildings. Of the 60 properties nominated for the FY2018 CWA grant, 33 contained dilapidated buildings in need of demolition (at least 10 buildings were already partially collapsed). Due to the small size of the communities, nearly all are eligible for several US Department of Agriculture (USDA) and Illinois Housing Development Authority (IHDA) grant and loan programs focused on rural communities. However, for sites to be eligible, the USDA/IHDA programs require that the municipalities obtain title to properties, complete environmental due diligence activities, obtain cost estimates, and develop specific reuse project plans. The FY2018 CWA grant completed some of these prerequisite steps for sites in three of our communities. However, grant applications in two of the communities could not advance due to complications resulting from the annual tax deed sales process. Having access to RLF funding would enhance the ability of our smaller communities to advance these projects.

All 4 of the priority sites are located within designated EZs (the Canton/Fulton Co., Galesburg, Macomb/Bushnell/McDonough Co., and Monmouth/Warren County<sup>5</sup>), whereby redevelopment projects are eligible for State incentives (that include certain sales tax exemptions for EZ real estate, a tax credit on depreciable property, and a IL natural gas tax exemption), as well as local incentives that vary but generally include a ten-year property tax abatement on improvements made to real property in the zone and waived fees for certain local permits. The **Former IH Plant** and the **Former Monmouth Plow Co.** site are both located within TIF Districts (TIDs) enabling both cities to access funding as needed for assessment, abatement, demolition, and cleanup, as well as infrastructure improvements and select development costs. For the previous 2017 proposal for an assisted living/memory care facility at the **Former IH Plant**, the City executed a redevelopment agreement that committed up to \$2M in funds for necessary engineering, subgrade work, and utility improvements. This level of financial support from the TID would be available for a future similar proposed development. In addition, to TID funding, Monmouth has an active municipal economic development RLF that could support redevelopment of the **Former Monmouth Plow Co.** site. The **Former Haeger Pottery** site is not currently located within a TID but is directly adjacent to the West Side Redevelopment Area TID, which would facilitate amendment of the TID boundaries if needed to support a future development/reuse proposal. All 4 sites, due to their size, locations, brownfields status, and other factors are potential candidates for the newly established IL Shovel Ready Site Program, which can provide up to \$1M grants for site acquisition, environmental site assessment, engineering design, site preparation, and infrastructure improvements. Finally, the IEPA has brownfields RLF funding from the EPA that could be used to support cleanup of one or more of the sites. However, these last two programs are dependent on competing for a small pool of funding against hundreds of communities. EPA RLF funding would be a far more locally accessible form of cleanup funding.

**1.c.ii. Use of Existing Infrastructure.** The priority sites and TAs, based their proximity to the centers of the region's 4 largest cities, are among the locations in the 6-county area most favorably positioned to leverage existing infrastructure (including water, sewer, highway access, rail access, sidewalks, and public transit systems). The availability of local infrastructure and its capacity to support desired redevelopment projects has been and will continue to be a key factor in the prioritization of sites. No critical infrastructure needs have been identified for the priority sites referenced in Section 1.a.ii.

## **2. COMMUNITY NEED & COMMUNITY ENGAGEMENT**

### **2.a. Community Need**

**2.a.i. The Community's Need for Funding.** Of our 68 incorporated cities and villages, all but 3 (Galesburg, Macomb, and Canton) have populations under 10,000 residents. In addition to their small size, nearly all the municipalities suffer from declining populations (which is a chronic negative economic factor leading to increased vacancies, depressed property values, and declining property and sales tax revenues). Since 2000, all but 4 have experienced population declines, with 75% (51 of 68) experiencing

<sup>5</sup> <https://www2.illinois.gov/dceo/ExpandRelocate/Incentives/taxassistance/Documents/Current%20EZ%20Listing.pdf>

declines of ≥10%. Due to their small size, the 65 smaller communities lack not just the financial but also the technical and administrative resources to effectively advance brownfields redevelopment on their own. The coalition structure for the FY2018 CWA grant was specifically created and implemented with a goal of supporting these smaller communities, and over 55% of funding for site-specific assessment or reuse planning activities was expended on sites in communities with populations under 10,000 residents. We will continue this focus for the FY2022 grant and make focused efforts for some of the RLF loans or subgrants to be provided to projects in these smaller communities.

Even the 4 largest cities face significant financial challenges that further limit their ability to fund the types of cleanup activities funded by an EPA RLF grant. Galesburg, Monmouth, and Canton have per capita debt levels (\$4,525, \$3,715, and \$1,146, respectively) that significantly exceed the median per capita debt level of \$794 for IL cities<sup>6</sup>. The financial challenges for all local governments are exacerbated by the extremely poor fiscal condition of the State. Illinois routinely ranks as one of the top states in the US with the worst fiscal condition (ranking 50<sup>th</sup> worst in a 2018 study by George Mason University<sup>7</sup>, as well as 50<sup>th</sup> in 2020 in short- and long-term fiscal stability rankings by US News & World Report<sup>8</sup>). The state’s budget woes impact every municipality in the state, in part due to 1) cuts in segregated funding, 2) uncertainty regarding the timing for payments, and 3) lack of funding for “non-essential” state programs, such as the State’s Municipal Brownfield Incentive Program receiving no additional funding since 2010.

As shown on **Table 1** below, both the TAs and the cities in which they are located are low income.

**Table 1. Economic Distress Data (American Community Survey [ACS] 2019 5-Year Estimates<sup>9</sup>)**

Data Type	South Canton TA <sup>A</sup>	South Galesburg TA <sup>B</sup>	West Central Macomb TA <sup>C</sup>	SW Monmouth TA <sup>D</sup>	4 Largest Cities <sup>E</sup>	6 County Area	State of Illinois	US
Median Household Income <sup>F</sup>	<b>\$35,711</b>	<b>\$22,945</b>	<b>\$24,363</b>	<b>\$41,579</b>	\$41,067	\$49,465	\$65,886	\$62,843
Per capita income <sup>F</sup>	<b>\$19,612</b>	<b>\$13,488</b>	<b>\$14,983</b>	<b>\$19,199</b>	\$22,961	\$26,606	\$36,038	\$34,103
Unemployment rate <sup>G</sup>	<b>5.4%</b>	<b>11.0%</b>	<b>14.9%</b>	<b>19.0%</b>	7.8%	6.2%	5.9%	5.3%

**Bold text** denotes values for which the target areas are significantly lower (income) or higher (unemployment rate) than the comparable values for the State of Illinois or the US as a whole. A) Combined data for Census Tract (CT) Block Groups (BGs) CT9534 BG1; CT9535 BG1, BG2, and BG4; and CT9536 BG3. B) Combined data for CT8 BG2; CT9, BG1, CT10, BG2 and BG3; CT11, BG1. C) Combined data for CT104 BG2 and BG3; and CT105 BG3. D) Combined data for CT8705 BG3 and BG4. E) Canton, Galesburg, Macomb, Monmouth. F) In 2018 inflation adjusted dollars. G) Civilian population in labor force ≥16 years, 1-year unemployment rate.

**2.a.ii.1 Threats to Sensitive Populations – Health or Welfare of Sensitive Populations.** As shown on **Table 2** below, the TA’s have disproportionately high numbers of residents who are minorities, who are living in poverty, and single female parent households with children under 18 years.

**Table 2. Disadvantaged Populations (ACS 2019 5-Year Estimates<sup>10</sup>)**

Data Type	South Canton TA <sup>A</sup>	South Galesburg TA <sup>A</sup>	West Central Macomb TA <sup>A</sup>	SW Monmouth TA <sup>A</sup>	4 Largest Cities	6 County Area	State of Illinois	US
Female households w/ <18 yrs	<b>12.7%</b>	<b>14.7%</b>	4.6%	<b>20.0%</b>	4.9%	4.6%	5.4%	5.3%
Poverty rate for individuals	<b>27.9%</b>	<b>42.7%</b>	<b>50.6%</b>	<b>31.8%</b>	22.5%	16.6%	12.5%	13.4%
Minority population	36.0%	36.5%	32.1%	<b>42.4%</b>	21.5%	12.1%	38.7%	39.3%
Hispanic population	11.1%	11.6%	6.7%	<b>28.6%</b>	7.4%	4.3%	17.1%	18.0%
Black only population	<b>21.7%</b>	<b>20.9%</b>	<b>15.3%</b>	10.4%	10.1%	5.0%	14.2%	12.7%

The health of residents within the TAs is poor, as detailed on **Table 3** which presents estimated 2020 prevalence rates for 14 chronic disease and health measures for adults from a study published by the Centers for Disease Control and Prevention (CDCP)<sup>11</sup> that includes data for all CTs in the State of Illinois.

**Table 3. Health Measure Estimates for Target Area Census Tracts (CTs)<sup>12 A</sup>**

Health Measure (see footnote 10 at bottom of this page for explanation of notes A-E)	Average Prevalence in Target Area CTs <sup>B</sup>	Average Prevalence in Illinois <sup>C</sup>	TA Prevalence Percentile among all 3,114 IL CTs	Health Measure	Average Prevalence in Target Area CTs <sup>B</sup>	Average Prevalence in Illinois <sup>C</sup>	TA Prevalence Percentile among all 3,114 IL CTs
Arthritis <sup>D</sup>	<b>30.0%</b>	24.3%	76.9	Kidney Disease (chronic) <sup>D</sup>	<b>3.5%</b>	2.8%	<b>82.2</b>
Asthma (current) <sup>D</sup>	<b>11.0%</b>	9.6%	<b>83.0</b>	Poor Mental Health <sup>D</sup>	<b>17.7%</b>	13.0%	<b>91.6</b>
High Blood Pressure <sup>D</sup>	<b>36.1%</b>	31.4%	74.4	Obesity <sup>D</sup>	<b>39.1%</b>	31.7%	<b>85.4</b>
Cancer (excluding skin) <sup>D</sup>	<b>6.7%</b>	6.4%	53.1	Poor Physical Health <sup>D</sup>	<b>16.5%</b>	11.8%	<b>89.0</b>
High Cholesterol <sup>D</sup>	<b>35.6%</b>	32.2%	74.4	Obstructive Pulmonary Disease <sup>D</sup>	<b>10.5%</b>	6.8%	<b>92.7</b>

6 Fiscal Year 2019 fiscal report card data for IL cities ([https://illinoiscomptroller.gov/ioc-pdf/LocalGovt/DataSummaries19/DataSum19\\_MU.pdf](https://illinoiscomptroller.gov/ioc-pdf/LocalGovt/DataSummaries19/DataSum19_MU.pdf))

7 <https://www.mercatus.org/publications/urban-economics/state-fiscal-rankings>

8 <https://www.usnews.com/news/best-states/rankings/fiscal-stability>

9 Data downloaded from the US Census Bureau website on 11/1/2021. All data are 5-year estimates for 2015-19.

10 Data downloaded from the US Census Bureau website on 11/1/2021. All data are 5-year estimates for 2015-19. A) See **Table 1** for CTs and BGs included in each TA.

11 <https://chronicdata.cdc.gov/500-Cities-Places/PLACES-Census-Tract-Data-GIS-Friendly-Format-2020-/yjkw-uj5s>

12 Notes for Table 3. A) Data accessed from the CDCP website on 11/1/2021. B) The target area CTs include 9534, 9535, and 9536 in Canton; 8, 9, 10, and 11 in Galesburg; 104 and 105 in Macomb; and 8705 in Monmouth. C) Calculated based on data for all 3,114 CTs in IL. D) Model-based estimate for crude prevalence among adults aged ≥18 years, 2018. E) Model-based estimate for crude prevalence of all teeth lost among adults aged ≥65 years, 2018.



Diagnosed Diabetes <sup>D</sup>	<b>12.4%</b>	9.9%	<b>80.0</b>	Stroke <sup>D</sup>	<b>4.3%</b>	3.2%	<b>83.0</b>
Coronary Heart Disease <sup>D</sup>	<b>8.5%</b>	5.9%	<b>90.5</b>	All Teeth Lost <sup>E</sup>	<b>22.2%</b>	12.7%	<b>88.5</b>

The target area CTs score worse (i.e., have higher prevalence rates) for all 14 health outcome measures than IL as a whole, and rank at the 80<sup>th</sup> percentile or above for 10 of the measures. The study also includes estimates for 4 unhealthy behaviors and 9 health prevention measures, for which the target area CTs also score poorly, ranking above the 90<sup>th</sup> percentile for 4 measures (smoking rate, lack of cervical cancer and cholesterol screening and mammography use), and above the 80<sup>th</sup> percentile for 3 other measures (lack of leisure time for physical activity, dental visits, and use by women of a core set of preventative health services). Food access is both a health and a welfare concern in the TAs, with 11 of the 15 block groups that form the TAs meeting one or more of the current USDA definitions for food deserts<sup>13</sup>. The FY2022 RLF grant will help further cleanup of contaminated sites, and the transformation of sites into safe housing, job-providing commercial or industrial businesses that increase wages and tax revenue, and/or community assets that provide improved opportunities for recreation, health, food access, or educational services.

**2.a.ii.2 Greater than Normal Incidence of Disease & Adverse Health Conditions.** As shown on **Table 3** in Section 2.a.ii.1, residents in the TAs have higher prevalence rates than the State of Illinois as a whole for asthma and cancer, which may be attributable in part for exposure from contaminants. As shown on **Table 4** below, children in the TAs are also subject to high rates of lead poisoning. **Table 4** presents the most recent (2019) childhood blood lead monitoring results by county published by the Illinois Department of Health<sup>14</sup>. Blood lead levels of ≥4.5 micrograms per deciliter (µg/dL) are considered indicative of lead poisoning.

**Table 4: Childhood blood lead monitoring results (Illinois Department of Health)**

Lead Level in Blood (µg/dL)	Year	Fulton Co	Hancock Co	Henderson Co	Knox Co	McDonough Co	Warren Co	State of Illinois
≥5	2019	<b>10.1%</b>	<b>11.0%</b>	<b>9.4%</b>	<b>13.0%</b>	4.4%	<b>10.2%</b>	5.6%

As shown on **Table 4**, the lead poisoning rates for 5 of the 6 counties in 2019 significantly exceeded the rate for the State of Illinois as a whole. The rates for Knox, Hancock, Warren, and Henderson Counties, ranked respectively, as the 4<sup>th</sup>, 8<sup>th</sup>, 10<sup>th</sup>, 11<sup>th</sup>, and 13<sup>th</sup> highest lead poisoning rates among the 102 total counties in Illinois.

The FY2022 RLF grant will be used to fund cleanups at sites that may contain lead, asbestos, and other contaminants that contribute to the exposure risks for residents in the TAs who suffer from lead poisoning and/or asthma. Lead is a known or potential contaminant at all 4 priority sites. Abandoned buildings are a major concern, as evidenced by 33 of the 60 of the sites nominated for the FY2018 CWA grant containing dilapidated buildings in need of demolition (at least 10 of which were already partially collapsed). The grant will advance plans to create new healthy housing on 2 of the sites, and projects that will result in new jobs that help to address some of the financial inequities present in these communities.

**2.a.ii.3. Promoting Environmental Justice.** EPA’s EJSCREEN Tool was used to evaluate the 15 block groups forming the 4 TAs for 16 EJ demographic and environmental indices. The combined average percentiles for the 4 TAs are summarized on **Table 5** below.

**Table 5. EPA EJ Screen Data for Combined Target Area Block Groups<sup>15</sup>**

EJ Demographic Indicators	Percentile in Region 5	EJ Environmental Indices	Percentile in Region 5	EJ Environmental Indices	Percentile in Region 5
Overall Demographic Index	<b>86</b>	Particulate Matter (PM2.5)	<b>86</b>	Lead Paint Indicator	<b>86</b>
People of Color Index	<b>77</b>	Ozone	<b>86</b>	Superfund Proximity	<b>83</b>
Low Income Population	<b>93</b>	NATA Diesel PM	<b>81</b>	RMP Proximity	<b>87</b>
Linguistically Isolated Population	<b>80</b>	NATA Air Toxics Cancer Risk	<b>84</b>	Hazardous Waste Proximity	<b>78</b>
Population w/ <HS Education	<b>87</b>	NATA Respiratory Hazard Index	<b>83</b>	WW Discharge Indicator	<b>87</b>
Population < 5 Years Old	47	Traffic Proximity and Volume	<b>81</b>		

Indicators or indices with percentiles >50 are shown in **bold** font and >80 in **red bold** font. The combined TA block groups score at the 80<sup>th</sup> percentile or higher for 10 of the 11 environmental indices and for 5 of the 6 demographic indicators. EPA’s Toxic Release Inventory (TRI) Program website was used to download detailed reporting data for 2019 for all reporting facilities located in the 6-county area. These data showed total on-site releases of 631,964 pounds of 26 toxic chemicals from 9 facilities, including 7,716 pounds of known carcinogens. The releases were overwhelmingly associated with 7 facilities located in the 4 cities where the TAs are located. Approximately 99.6% of the reported total on-site releases and 98.7% of the on-site carcinogen releases were associated with these 7 facilities located in these cities and in or near the TAs.

The grant will be used in the TAs and at select priority sites to cleanup contamination that is contributing to exposure risks in these EJ neighborhoods. The grant will support redevelopment initiatives that are working to provide new and safe housing, green spaces and jobs while also advancing projects that will eliminate blight and potential exposure of residents to lead and other contaminants associated with priority brownfield sites. Planned outreach measures will assure that residents in these neighborhoods are informed and provided with opportunities for input on cleanup and site reuse decisions.

13 Food Access Research Atlas (<https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas/>) accessed on 11/21/2021.

14 <https://dph.illinois.gov/content/dam/soi/en/web/idph/publications/idph/topics-and-services/environmental-health-protection/lead-poisoning-prevention/lead-surveillance-report-2019.pdf>

15 Source: <https://www.epa.gov/ejscreen> Accessed 9/8/2021 HS = High School; NATA =National Air Toxics Assessment ; PM = particulate matter; RMP = risk management plan; WW = wastewater.

## 2.b. Community Engagement

**2.b.i/ii Project Involvement and Project Roles.** A BAC was established to implement the FY2018 CWA grant that included representatives from Prairie Hills, each of the coalition partners for the CWA Grant (Fulton, Knox, McDonough, and Warren Counties, Cities of Macomb and Monmouth), as well as representatives from other partner organizations as summarized on **Table 6** below. The BAC will continue to function in an advisory role for implementation of the FY2022 RLF grant, if awarded, although the local governments will participate as equal partners without some being designated as actual BAC members. BAC meetings will be held approximately every 4 months and include updates on completed or in progress assessment, cleanup, and redevelopment activities at priority sites. All BAC members participate in decisions on site selection and funding.

Four groups of local organizations that will assist in implementation of the project. Contact information and their involvement/roles are summarized on **Table 6** below.

**Table 6: Project Partners**

**Local Government Partners – Names and Contacts:** **City of Canton** (Kent McDowell, Mayor, 309-647-0065, [kmcdowell@cantontcityhall.org](mailto:kmcdowell@cantontcityhall.org)); **City of Carthage** (Jim Nightingale, Mayor, 217-357-3204); **City of Dallas City** (Kevin Six, Mayor, 217-852-3377, [REDACTED]); **City of Galesburg** (Peter Schwartzman, Mayor, 309-877-1988); **City of La Harpe** (Katherine Hasten-Reed, Mayor, 630-854-3617, [REDACTED]); **City of Macomb** (John Bannon, Community Development Coordinator, 309-833-4944, [cdc@cityofmacomb.com](mailto:cdc@cityofmacomb.com)); **City of Monmouth** (Lew Steinbrecher, City Administrator, 309-734-2141, [lew.steinbrecher@cityofmonmouth.com](mailto:lew.steinbrecher@cityofmonmouth.com)); **Fulton Co.** (Roger Clark, 309-547-0901, [rclark@fultonco.org](mailto:rclark@fultonco.org)); **Hancock Co.** (Delbert Kreps, Co. Board Chair, 309-333-3414, [REDACTED]); **Henderson Co.** (Brad Flat, Board Chair, 309-867-3121, [theflats@derbytech.net](http://theflats@derbytech.net)); **Knox Co.** (Darla Krejci, Board Member - District 1, 309-299-7888, [darla.krejci@co.knox.il.us](mailto:darla.krejci@co.knox.il.us)); **McDonough Co.** (Scott Schwerer, Board Chair, 309-652-3830, [schwerer5@mtcnw.net](mailto:schwerer5@mtcnw.net)); **Warren Co.** (Mike Pearson, Board Chair, 309-221-7215, [mbpearson@mtcnw.net](mailto:mbpearson@mtcnw.net)). **Involvement/Roles:** Representatives from each of these local governments serve on the current BAC, where they provide input on site selection and funding decisions. They are responsible for completing nomination forms, soliciting interest by property owners, securing access agreements, and providing financial and other assistance as necessary for sites to move beyond cleanup to reuse. They also have primary responsibility for informing and educating the public in their communities and the TAs regarding the EPA funded project. Representatives from the other 60+ local governments in the 6-county region will be encouraged to participate in the project and serve on the BAC if they have an interest and commitment to actively participate.

**Local Economic Development Organizations – Names and Contacts:** **Hancock County EDC** (Samantha Harnack, Executive Director, 217-440-8909, [REDACTED]); **Carthage Community Development (CCD)** (Amy Graham, Director, 217-357-3800, [ccdc@carthage-il.com](mailto:ccdc@carthage-il.com)); **Knox County Area Partnership** (Ken Springer, Executive Director, 309-343-1190, [kspringer@galesburg.org](mailto:kspringer@galesburg.org)); **Macomb Area Economic Development Corporation** (Kim Pierce, Executive Director, 309-837-4684, [director@maedco.org](mailto:director@maedco.org)). **Involvement/Roles:** All 4 local economic development organizations were participants in the FY2018 CWA grant which will continue for the FY2022 grant. Their involvement includes serving on the BAC (site selection and funding decisions). They are the most knowledgeable regarding the needs and interests of local businesses and developers as they relate to brownfields, and are positioned to provide local financial assistance tools referenced in Section 1.c.i.

**Local Institutions – Names and Contacts:** **Illinois Institute of Rural Affairs (ILIRA)** (Chris Merritt, Executive Director, 309-298-2237, [cd-merritt@wiu.edu](mailto:cd-merritt@wiu.edu)). **Involvement/Roles:** The ILIRA is a key entity in supporting economic development and prosperity in rural communities throughout IL and an ideal partner for the project. ILIRA is located within the same city as Prairie Hills, and within the **W. Macomb TA**. ILIRA will continue to serve as a member of the BAC and to collaborate as a partner for reuse planning projects performed in the smaller communities.

**Other Organizations – Names and Contacts:** **National Association for the Advancement of Colored People (NAACP) – Galesburg Branch 3016** (Brittany Grimes, President, 309-431-1361, [REDACTED]); **NAACP – McDonough Co. Branch 3022** (Byron Oden-Shabazz, President, 309-255-3469, [REDACTED]). **Involvement/Roles:** The NAACP branches will support the project through participation on the BAC and serve as a key conduit for sharing information and securing input from local African American residents living in Galesburg and Macomb/McDonough Co.

**2.b.iii. Incorporating Community Input.** Upon notice of award, we will update the previous Community Involvement Plan (CIP) that details methods for informing the community and incorporating community input into decisions. The BAC meetings are a key method through which we will communicate with the local organizations, entities, and groups that are involved with the project. We will maintain the meeting format and process that was effectively used during the FY2018 CWA grant, with meetings held approximately every 4 months. Meeting invitations and agendas are sent out to BAC members and other project partners 2 weeks prior to each meeting. Each 90-minute meeting follows a standard format: 1) an update on project finances and the status of accomplishing the various outputs included in the Cooperative Agreement (CA) work plan; 2) updates from the EPA project officer and/or IEPA brownfields program representative; and 3) updates on cleanup or redevelopment/reuse activities at individual sites, including “lessons learned” that may be of interest/value to the local government and other participants. More in depth presentations are made on priority sites, and sites on which reuse planning was performed. Copies of the meeting handouts, presentations, and minutes are posted on the Prairie Hills brownfields webpage, as well as sent by email to all BAC members.

BAC meetings are open to the public. Information on the program and individual projects is included in our quarterly newsletter

which is sent to over 550 active subscribers. Local governments have primary responsibility for informing residents in their individual communities on the project. Typically, the work at individual sites is considered newsworthy and covered by local newspapers (i.e., Canton Daily Ledger, Galesburg Register-Mail, McDonough County Voice) and radio stations. Project information is typically included within community newsletters sent to their residents. Additional efforts will be made as part of the FY2022 grant to inform and involve residents within the 4 TAs, including collaboration with the Galesburg and McDonough Co. Chapters of the NAACP (through posting of information on their Facebook pages, which each has over 1,000 followers). In addition, Spanish language factsheets will be prepared and made available on our website and at meetings. These measures will help in making sure that residents in the TA neighborhoods are informed and provided with meaningful opportunities for input on cleanup options and reuse plans.

Alternatives to in person meetings were used throughout the final 14 months of the FY2018 CWA grant, which coincided with the COVID-19 pandemic and various periods of legally prescribed or voluntarily implemented restrictions on in person meetings. BAC meetings continued in a virtual format and all 5 reuse planning projects were also completed via virtual meetings and presentations using WebEx. For the BAC meetings in particular, these methods were effective with attendance increasing. For the FY2022 grant, we will return to in-person meetings whenever possible but will also maintain options for participation via WebEx or other on-line meeting platforms. This will enable us to quickly and efficiently return to a virtual format if necessitated by renewed social distancing restrictions or other short-term challenges such as unsafe winter weather driving conditions.

### **3. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS**

#### **3.a.i Program Description and Marketing Strategy – Program Management**

**Building and maintaining a competent team:** Prairie Hills will use its existing staff, Prairie Hills current Small Business Revolving Loan Committee, and BAC members to form a Project Management Team (PMT) that will: (a) establish the RLF Program, and (b) integrate the RLF Program with the region's overall economic development initiatives and programs. Prairie Hills will use their existing Loan Manager to provide specialized expertise (i.e., financial underwriting, loan servicing, etc.) necessary for the effective long-term operation of the RLF Program. Prairie Hills has effectively used this approach for its existing RLF Program, which has been in operation for 23 years. A Loan/Subgrant Administration Board (Loan Administration Board) will be formed that includes some members of the PMT, as well as other members who represent a cross section of the area's community leadership (both private and public sector), minorities, and individuals with experience in commercial lending. The Loan Administration Board will make final decisions on loan/subgrant proposals.

**Selecting borrowers/subgrantees and projects:** The RLF Program will select projects in part based on their ability to advance priority goals identified by the community for the Target Area, in particular: 1) providing quality local jobs, 2) providing additional affordable housing, and 3) expanding and improving parks and green space. Additional consideration will also be given to sites and projects that were assessed using the Prairie Hills' EPA FY2018 CWA Grant. Eligible applicants must have site control, meet EPA eligibility requirements for participation, and have an IEPA approved cleanup or abatement plan in place to ensure minimum remedial standards will be met and the cleanup will be protective of human health and the environment. Applicants will complete a two-step application process, with the initial application focused on providing information to the Loan Manager who, together with the PMT, will review the information to evaluate site eligibility (with assistance from the EPA Project Officer), funding needs versus available funding, and alignment with RLF Program funding priorities. Applicants/projects that pass this initial review will be invited to submit a complete application, that will include standard loan documentation, credit reports, collateral, appraisals, and complete environmental documentation (Phase I/II ESAs, Remedial Investigation reports, RBM Survey reports, Cleanup/Abatement Plans, IEPA approvals and correspondence). The Loan Manager will work with the PMT to review submitted information and to prepare a funding proposal, which will be presented to the Loan Administration Board, which will approve or deny the proposal, or may defer the decision and request supplemental information. Although a goal of the Program including helping to provide access to funding for borrowers who are unable to secure funding from other sources, an even greater priority will be on avoiding bad loans – which would undermine the goals of revolving funding to establish a permanent source of funding that can be used to advance brownfields cleanup in the Target Area.

**Structuring and administering loans and subgrants and facilitating financial underwriting:** The administrative procedures for the EPA RLF Program will be guided in part by Prairie Hills's existing Small Business Development RLF Program. The RLF Program will provide flexible, low-interest cleanup loans and subgrants to eligible applicants. Based on the contamination present in the target areas, loans and subgrants will be allocated to hazardous substance cleanup and to petroleum cleanup. Interest rates and repayment periods will be negotiated on a case-by-case basis, dependent on the risk-profile of the applicant and the needs of the project. RLF loans may cover up to 100% of an application's site cleanup costs, to serve as gap financing for high-risk projects that would otherwise not be financially feasible. However, to maximize federal dollars, cleanup costs will not be allowed to exceed 50% of total project costs. Other basic loan terms include: (1) risk-based interest rate starting at 75% of the current prime rate; (2) initial term of a maximum of 5 years; and (3) maximum loan amount determined on a project basis.

Up to \$150,000 in subgrants will be available for eligible applicants, who meet all criteria outlined above and demonstrate their projects are not feasible but for the use of a subgrant. Subgrant applicants will have defined criteria and will need to demonstrate that they own the site and that they are not potentially liable for the contamination at the site. The PMT and Loan Manager will review subgrant applications for project and redevelopment feasibility before making a recommendation to the Loan

Administration Board for the final subgrant determination.

**ii. Revolution of the RLF Program: Incorporate reasonable and prudent lending practices.** The RLF Program will encourage the revolving of RLF funds by: (a) employing prudent underwriting practices with a goal of 0% default, (b) recognizing that the amount of RLF Funding available is very limited relative to the potential need in the Target Area, and therefore, focusing on strategic projects (where the funds can address a key financing gap, versus focusing on “high degree of difficulty” projects – worthwhile though they may be), (c) focusing on loans (as funds can’t revolve if they are given away as subgrants), (d) limiting the duration of loans, and focus on projects with a need for short-term gap financing, rather than situations where the RLF funds will be structured as part of the projects long-term financing. To sustain the program for the long-term, including after the cooperative agreement has ended: (a) program income will be revolved (re-loaned) or spent on brownfield cleanup, (b) program income will be deposited into an interest-bearing account, and (c) program income will be inclusive of all principal repayment, interest earned on outstanding loan principal, interest earned on accounts holding RLF program income not needed for immediate lending, loan fees, loan-related charges received from borrowers, other income generated from RLF operations, proceeds from the sale-collection-or liquidation of a defaulted loan, and proceeds in excess of unpaid principal.

**Strategy for properly maintaining and reporting outcomes and outputs to EPA so long as program income exists:** Prairie Hills’s existing Small Business RLF Loan program has been in operation since 1998 funded through four grants and three loans from the USDA Rural Development Agency. The proposed project management approach is designed to maintain the RLF Program for the long-term, including after the cooperative agreement has ended. Reporting and management criteria for current RLF is designed to provide for long-term tracking and maintenance of financial records for assisted projects, and long-term compliance with financial, and outcomes reporting to USDA Rural Development will be similarly maintained. Management and compliance for the Brownfields RLF Program will be similarly designed and executed.

**iii. Marketing Strategy:** a) Prairie Hills will employ both short-term and long-term strategies for marketing the RLF Program. A short-term strategy will include a significant focus on integrating marketing with activities that have been in progress as part of Prairie Hills FY2018 CWA Grant, and build on successful outreach meetings, presentations, and other efforts that has been implemented through 2021. The inventory task completed in the FY18 CWA identified a portfolio of sites/proposed projects that meet the eligibility requirements and are in potential need of cleanup funding. The assessment and reuse planning tasks completed in the FY18 CWA completed the environmental studies, plans, and approvals in place to meet the application requirements for the RLF Program. Another priority will be achieving one or more high visibility early successes (as few things are as effective as well publicized local examples “success stories” featuring the RLF Program). The long-term strategy will be to effectively integrate marketing of the RLF Program with Prairie Hills and partners overall economic development program marketing and initiatives – which will help in matching these projects with other potentially available funding and incentives and will also help in limiting the long-term costs (a key for program sustainability).

b) The marketing program will include: 1) outreach to neighborhood/community organizations (with support from the project partners listed on **Table 6**), 2) engagement with the real estate brokers, environmental consultants, bankers, major property owners and realtors, and 3) use of social media, including providing information on Prairie Hills resource conservation and development program website, and its brownfields project website. Digital and print marketing materials will be prepared specifically for the RLF Program and will include Spanish language materials.

**3.b. Description of Tasks/Activities & Outputs.** **Table 7** provides a detailed description of the proposed project activities, schedule, leads, and outputs for each task.

**Table 7. Summary of Tasks, Schedule, Leads, and Outputs**

<p><b>Task 1: Establish RLF, Grant Oversight and Fund Management</b></p> <p><b>i: Implementation:</b> Upon notice of award, the PMT will convene as well as the Loan Administration Board. Subsequently, Prairie Hills will complete qualifications-based procurement process (compliant with 2 CFR 200.317-326) and retain a Qualified Environmental Professional (QEP) to support implementation of the RLF Program. The Administrative Plan will be prepared detailing all policies and procedures relevant to establishing and administering the Brownfields RLF Program (Prairie Hills’s existing RLF Loan Program will be used as the initial template but tailored to match the unique characteristics of brownfield sites, as well as requirements specific to the EPA Cooperative Agreement). A combined loan/subgrant initial application form will be created. As loan/subgrant applications are received, they will be reviewed by the PMT and approved or denied by the Loan Administration Board. Agreements will be executed for approved loan/subgrant applications. The Loan Manager will manage loans and associated financial record keeping and reporting, and provide reports on at least a quarterly basis to Prairie Hills Project Manager and PMT. The PMT will meet on at least a quarterly basis during initial stages of the project (to guide development and launching of the RLF Program and maintain progress towards deployment of all available loan/subgrant funds), and as needed during later stages (as issues are encountered or funding for additional loans becomes available). Required quarterly and annual progress and financial reports will be completed and submitted to EPA.</p> <p><b>ii: Anticipated Schedule:</b> Initial steps (convening the PMT and forming the Loan Administration Board and procuring the QEP) will begin following initial notice of award. The Administrative Plan and application form will be completed within the first quarter. The PMT will convene on a quarterly basis until agreements are executed for all initial loan/subgrant funding. The Loan Administration Board will convene as loan/subgrant proposals are completed for consideration. The goal will be to execute</p>
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agreements for all initial loan/subgrant funding during the initial 2 years of the Program. EPA required quarterly and annual reports will be completed by the specified due dates. The Loan Manager will process, monitor, and maintain records for all loans/subgrants on an on-going basis and provide reports to Prairie Hills Executive Director and PMT on a quarterly basis.

**iii. Task/Activity Lead:** The PMT will convene as applications are received and recommend loans/subgrants, based on project eligibility, applicant credit worthiness, and demonstrated project economic and environmental benefits, to the Loan Administration Board for approval. The Loan Manager will track the progress of each loan and subgrant as well as for the RLF Program overall and report to the Loan Administration Board and Prairie Hills Executive Director. The Loan Manager will also retain all records necessary for auditing of the Program. Prairie Hills's Executive Director will be responsibility for completing all quarterly and annual progress, financial and other reporting required by the Cooperative Agreement.

**iv. Outputs:** a) RLF Program Administrative Plan. b) QEP procurement documentation and service agreement. c) Loan/subgrant applications and supporting documentation. d) Loan/subgrant review and decision records. e) Agendas and minutes for meetings of the Loan Administration Board. f) Loan/subgrant agreements. g) Detailed financial records for all loans/subgrants. h) EPA quarterly and annual financial and progress reports.

### **Task 2 – Community Engagement and Program Marketing**

**i. Implementation:** Prairie Hills will build on initial **outreach** that occurred as part of Prairie Hills's FY2018 CWA Grant which was focused on revitalization of brownfields in the same Target Areas, and involve the same project partners listed in Section 2.b. Community engagement activities for the RLF Program will include notifying landowners and communities in the Target Areas about cleanup schedules and project progress; conducting 30-day comment periods on Analysis of Brownfield Cleanup Alternatives (ABCAs); creating technical presentations, exhibits, and handouts for meetings; drafting meeting summaries; and responding to public comments gathered in meetings and through Prairie Hills's Brownfields Program website. Although the engagement process will need to be adjusted following completion of the CWA Grant, the key focus will be during the initial 2 years of the Program when Prairie Hills's goal is to fully expend all budgeted amounts for loans/subgrants on eligible priority sites. Digital and print marketing materials will be prepared specifically for the RLF Program and used to support both community engagement and marketing activities. Spanish language materials will be created to facilitate engagement and marketing for *the estimated 6,846 residents in the 6-county area who are Hispanic*, and the 4,188 residents who reportedly speak Spanish at home and English "less than very well".

Program marketing will be integrated with Prairie Hills's existing economic development programs along with the TA major cities and regional economic development agencies, which provide information on an array of funding and incentive programs available to businesses or developers. This integrated marketing approach is essential in that it will provide brownfields redevelopers with information on complementary incentive and funding programs that are available to advance projects and to address funding needs beyond those linked to environmental cleanup

**ii. Anticipated Schedule:** Community engagement and marketing of the RLF Program will be on-going throughout the project but focused in particular during the initial 2 years when the goal is to put loans/subgrants in place for the full budgeted amounts.

**iii. Task/Activity Lead:** Prairie Hills staff (who lead the FY2018 CWA Grant project) will lead the community engagement activities, with support from the QEP. TA economic development agencies, community groups, and cities will assist marketing of the FY2022 RLF Grant, with support from Prairie Hills staff.

**iv. Outputs:** a) 20 public meetings over 5 years; b) program progress updates and explanation of proposed projects, including public comment periods; c) informational materials, bilingual materials as necessary; and d) program information on Prairie Hills's Brownfields Program website and other locations and digital platforms.

### **Task 3 – Cleanup Oversight**

**i. Implementation:** The QEP will review approved ABCAs, remediation plans, and abatement plans to verify cleanups will be completed in a manner protective of public health and the environment, and in accordance with applicable regulations. The QEP will confirm the applicant's enrollment in all relevant state programs, perform site visits while cleanups are in progress, and review remedial documentation (or other loan/subgrant requirements reports) documenting that cleanup was completed in accordance with plans, and applicable State, federal, local, and loan/subgrant requirements.

**ii. Anticipated Schedule:** Work to be performed by the QEP will depend on the timing for receipt by the Loan Manager of initial application materials for loans/subgrants. Work would continue as loan/subgrant agreements are executed and cleanups are completed throughout the 5-year initial grant period. It is anticipated the reviews completed by the QEP as part of loan/subgrant underwriting would occur primarily during the first 2 years of the grant, with oversight of in progress or completed remediations occurring primarily in years 2 and 3.

**iii. Task/Activity Lead:** The QEP will lead this task, under the direction of Prairie Hills's Executive Director.

**iv. Outputs:** a) Documentation of reviews performed by the QEP of environmental investigation reports and plans submitted by applicants (Phase I/II ESAs, remedial investigation reports, cleanup plans and/or ABCAs). b) QEP or RBM abatement completion records or RBM abatement completion records site visits and associated records. c) Documentation of reviews performed by QEP of remedial documentation report.

### **Task 4 – Cleanup Loans and Subgrants**

**i. Implementation:** Approved loan/subgrant funding will be dispersed to eligible projects for performance of cleanup work. As

detailed in Section 1.a.ii, the priority sites will be among those initially considered for use of funding. Assuming that cleanup funding agreements are executed on these sites, EPA funded activities that will take place would include abatement of lead, asbestos and other RBMs in buildings on the Former Monmouth Plow site where buildings would be either renovated or demolished. EPA-funded cleanup activities at the other three priority sites would potentially include excavation and off-site disposal of contaminated soil in hot-spot areas and on-site management/capping of soil in other areas, collection and analysis of required verification samples, and preparation of remedial documentation reports. The QEP (under Task 3) would verify at the completion of EPA-funded cleanup activities in accordance approved abatement or cleanup plans, and review documentation submitted to IEPA or other agencies, and approvals issued by those agencies.

ii. **Anticipated Schedule:** Prairie Hills’s goal is to have loan subgrants executed for all RLF loan/subgrant budgets within the first 2 years of the project, with funded cleanups completed and fully documented within the first 3 years. As loans are repaid and funding is replenished, additional loan agreements would be executed.

iii. **Task/Activity Lead:** This task is integral with loan/subgrant application review, underwriting, agreement execution, and loan servicing/monitoring/record keeping/reporting to be completed by Prairie Hills and the Loan Manager as detailed under Task 1, and the cleanup oversight and cleanup documentation review/verification to be performed by the QEP as detailed under Task 3. Cleanup work will be completed by the loan/subgrant recipients, and qualified environmental contractors and consultants retained by those recipients.

iv. **Outputs:** a) 2-3 loans. b) 1-2 subgrants. c) 3-5 remediated brownfield sites. d) Completed remedial documentation reports and IEPA approvals for each site.

**3.c. Cost Estimates:**

The budget for grant funded and cost share activities by task, funding type, and category is summarized below.

**Table 6. Budget Summary for Grant Funded Activities by Task and Budget Category**

Line #	Budget Categories	Task 1	Task 2	Task 3	Task 4	Totals
		Grant Oversight, Underwriting & Fund Mgmt.	Community Engagement & Program Mktg.	Cleanup Oversight	Cleanup Loans and Subgrants	
1	Personnel/Fringe	\$40,000	\$27,500	\$0	\$0	\$67,500
2	Contractual	\$0	\$0	\$32,500	\$0	\$32,500
3	Loans	\$0	\$0	\$0	\$750,000	\$750,000
4	Subgrants	\$0	\$0	\$0	\$150,000	\$150,000
5	<b>Total Direct Costs</b>	\$40,000	\$27,500	\$32,500	\$900,000	\$1,000,000
6	Indirect Costs	\$0	\$0	\$0	\$0	\$0
7	Total Federal Funds	\$40,000	\$27,500	\$32,500	\$900,000	\$1,000,000
8	Cost Share (20%)	\$0	\$0	\$0	\$200,000	\$200,000
9	<b>Total Budget</b>	<b>\$40,000</b>	<b>\$27,500</b>	<b>\$32,500</b>	<b>\$1,100,000</b>	<b>\$1,200,000</b>

Notes: \*No federal funds are requested for fringe benefit, travel, or supply costs, and therefore, these categories are not included on the table.

Descriptions for how the cost estimates for each task and budget category were developed including costs per unit where applicable, are provided below.

**Personnel costs in Task 1** of \$40,000 were estimated using a combined average hourly combined personnel/fringe rate for Prairie Hills staff of \$50/hour, and assuming approximately 800 hours of work by Prairie Hills staff in performing grant oversight and fund management over the 5-year implementation period. Task 2 personnel cost of \$27,500 were estimated at \$50/hour, and assuming approximately 550 hours of work leading community engagement and program marketing efforts. Task 2 will be concentrated in the initial 2 years of the Program. These costs were estimated based on Prairie Hills’s experience in managing and marketing its current RLF program, and through communications with other past recipients of EPA Brownfields RLF funding.

**Contractual costs** of \$32,500 are budgeted for work by the QEP under Task 3 over the 5-year implementation period, and assuming issuance of up to 3 loans and 2 subgrants. The QEP costs are based on an estimated 46.6 hours of work per loan/subgrant project at an average hourly billing rate of \$140/hr (~ \$6,500 per loan/subgrant and \$32,500 total). QEP costs assume that several loans and/or subgrants will be made to projects for which complete environmental due diligence and cleanup plans will be in place requiring a lower level of effort for review. It is also assumed that all loans/subgrants will be made to projects having IEPA approved cleanup plans in place (or approved abatement plans for projects involving removal/abatement of regulated building materials).

**Cleanup Loans and Subgrants:** 75% of requested RLF funding (= \$750,000) will be allocated to provide loans for eligible brownfields cleanup activities, and 15% (= \$150,000) on subgrants. Prairie Hills intends to provide 2-3 loans and 1-2 subgrants with the federal funds. The percentage of this funding associated with loans will depend in part on the final number of subgrants and loans, and the actual underwriting and environmental oversight costs associated with each. However, it is likely that a majority of these personnel and contractual costs will be associated with loans.

**Cost Share:** The required 20% cost share of \$200,000 will be provided through loan-subgrant agreements that require a match from the recipient for eligible and allowable expenses (anticipated to be remediation or abatement costs to be paid by the loan-subgrant recipients). Providing the cost share through this approach will facilitate the long-term tracking and documentation of match funds and simplify the verification of the eligibility of activities being claimed as match. Providing match through loan-subgrant agreements will be accomplished by pairing the awards of RLF funds with (1) state brownfield grants or loans, (2) requiring the recipient to provide a match of 20% in money, labor, materials, or services, or (3) a combination of each of the options. Prairie Hills will ensure that the 20% cost share meets the EPA definition of an eligible and allowable expense. Prairie Hills may provide additional in-kind cost share through time devoted to administering the funds, as necessary to meet the 20% cost share requirement.

**3.d. Measuring Environmental Results.** Prairie Hills will utilize a variety of tools to track, measure, and evaluate progress in achieving various outputs listed in **Table 5**, as well as overall project results and desired outcomes. One tool for the FY2022 RLF grant will be a detailed spreadsheet developed as part of the FY2018 CWA grant, which will be used to track basic information (ownership, history, environmental concerns, etc.) for all nominated sites, as well as information for cleanup and abatement activities completed on sites for which loans or subgrants are provided. The spreadsheet will be used to efficiently track and report progress to EPA on ACRES and via the quarterly progress reports and posted on the project webpage.

Prairie Hills will also track the various standard outcomes recorded in ACRES, including public and private funding leveraged, acres of land made available for reuse, number of jobs created, etc. Furthermore, Prairie Hills commits to continuing ACRES updates beyond the life of the grant to capture longer-term outcomes. We recognize that a key to the success of the project and program will be securing applications for qualified and eligible projects during the initial 1-2 years of the Program. The inventory and outreach tasks of the Prairie Hills's EPA CWA FY18 Grant (which were just completed) will be used to help identify proposed or potential brownfields projects that could be well suited for the FY2022 RLF Grant. By the time the FY2022 RLF Grant is awarded, a goal for Prairie Hills will be to have 4-6 high quality prospects in place.

#### **4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE**

##### **4.a. Programmatic Capability**

**4.a.i/ii. Organizational Structure and Description of Key.** Prairie Hills has three staff who will help carry out the programmatic, administrative, and financial requirements of the project and grant, and who successfully carried out similar roles and responsibilities for the FY2018 CWA grant which was completed on time, and met or exceeded all metrics in the approved project work plan. We are supported in our efforts by a 9-member governing Executive Board that includes representatives from six county boards and Soil and Water Conservation Districts, as well as representatives from other local governments, development agencies, non-profit organizations, businesses, and educational institutions. In addition, we have an 11-member Advisory Council that includes representatives from many local governments and potential stakeholders in projects related to environmental conservation and economic development. Representatives serving on the Prairie Hills Executive Board and the Advisory Council will provide specialized expertise, when needed, to supplement our capacity.

**Brownfields Advisory Committee (BAC):** The BAC established for the FY2018 CWA grant remains active (meeting every 4 months) and will continue to provide input on project priorities. The BAC includes representatives from Prairie Hills, from all 6 counties, from 7 cities, as well as four local economic development organizations listed as project partners on **Table 4**. All served as members of the BAC for the FY2018 CWA Grant and have decades of combined experience managing and implementing a wide range of federal grants and will serve as a resource throughout all phases of grant implementation process to assure the project's success.

##### **4.a.ii. Description of Key Staff**

Prairie Hills staff and their roles are described below:

**Project Manager – David King, Executive Director, Prairie Hills:** Mr. King served as the project manager for the FY2018 CWA grant and will continue in this role for the EPA FY2022 RLF grant. From 1977 through in 2011, Mr. King worked as an employee of the USDA Natural Resources Conservation Service. Beginning in 1986, he served as the Federal Coordinator for Prairie Hills, administrating its rural development programs including developing its Small Business Loan Program which has provided 85 loans to date that have matched \$3,020,000 in Prairie Hills funds with \$2.5M in federal funds and leveraged \$22.2M in private investment. The loan program has created/retained 539 jobs to date. Under Mr. King's tenure, Prairie Hills received its IRS 501(c)3 designation and received two national recognition awards for community involvement from the National Association of Resource Conservation and Development Councils.

**Assistant Project Manager – Clare Kernek:** Ms. Kernek is the Program Coordinator for Prairie Hills. She has bachelor's degree in English, as well as a Juris Doctor (JD) in Environmental and Natural Resources Law and has worked for various law and policy organizations. She currently leads outreach and communications for Prairie Hills and for Prairie Land Conservancy, including planning events, designing, writing, and editing a quarterly newsletter, and managing the organizations' social media and websites.

**Other Project Support:** The 9-member governing Prairie Hills Executive Board and 11-member Advisory Council includes members with diverse backgrounds who have contributed additional expertise where needed for implementation of the FY2018 CWA grant, and who are available to provide support for the FY2022 grant. The PMT includes multiple representatives with

extensive professional experience in economic development, grant management, and community outreach.

**4.a.iii. Acquiring Additional Resources.** Prairie Hills routinely contracts out for engineering and consulting services and has expertise in complying with the requirements in 2 CFR 200.317-326 – including having completed this process for the Prairie Hills’s current FY2018 EPA CWA grant. The City’s project management team (Section 4.a.ii) has the experience and expertise needed to manage the QEP and any other contractors or subrecipients, as they complete grant funded activities.

**4.b. Past Performance & Accomplishments (Previous EPA Brownfields Grant Recipient):** Prairie Hills has received one previous EPA Brownfield Grant (FY2018 CWA grant; BF-00E02372; \$600,000; 10/1/2018 to 9/30/2021).

**4.b.i.(1) Accomplishments:** As of the project end date (9/30/2021), assessment and/or remedial/reuse planning activities have been performed at 31 sites entered in ACRES. Completed outputs at these sites included Phase I ESAs for 29 sites (vs a BF-00E02372 CA work plan goal of 24); SAPs and Phase II ESAs at 17 sites (vs goal of 16), RBM surveys on 18 buildings (vs goal of 6), ABCAs for 3 sites (vs goal of 6), and reuse plans for 5 sites (vs goal of 2). Except for ABCAs, all outputs exceeded the BF-00E02372 CA work plan goals.

**Highlights of Accomplishments at Individual Sites:** In Monmouth, Phase I/II ESAs, an RBM survey, and site-specific reuse plan resulted in the city moving forward with acquisition of a long vacant and partially collapsed former dairy building in the center of downtown. A local foundation provided a \$70K grant to help pay for the abatement and demolition in 2020, and the site is now in use as a parking lot and green space for the adjoining Public Library. Also in Monmouth, grant-funded Phase I/II ESAs and an RBM survey were keys to the sale in 2021 of the former Glastex Boat Factory (large 8.5-acre former industrial property, vacant for nearly 15 years) to a local entrepreneur who is expanding their pallet business. La Harpe (population 1,175) and Dallas City (population 805) are moving forward with acquisition of 5 tax delinquent and partially collapsed abandoned buildings in the center of their downtowns. EPA funded Phase I ESAs, RBMs surveys, structural analyses, and reuse plans are being used to help these cities apply for USDA grants and loans that can pay for abatement and demolition. In Canton, EPA funded Phase I ESAs advanced the purchase of 3 brownfield sites by the city – 2 parcels associated with a remediated former manufactured gas plant (600 W IL Route 9) will serve as a Canton Street Department headquarters, and a former bulk fuel plant (603 Grant Place) with a building that will serve as a public works garage. Also in Canton, EPA funded Phase I/II ESAs, RBM surveys, and an ABCA advanced the sale of a long vacant former gas station and auto dealership site (260 N. Main St.) on which construction of a \$2.5M Arby’s restaurant is planned for the Spring of 2022. In Macomb, the owner of one of the City’s largest brownfield sites (the **Former Haeger Pottery**, which closed in 2005) cooperated with the City in completion of a reuse planning study funded by EPA. The owner completed abatement and demolition of the buildings in 2020. In Carthage (population 2,490), an RBM survey and reuse plan completed for the Legacy Theatre in Carthage helped advance demolition of a building and a planned \$1M renovation/expansion.

**4.b.i.(2) Compliance with Grant Requirements:** Prairie Hills has complied with all work plan, schedule, terms and conditions, and timely and acceptable reporting requirements associated with the referenced assistance agreement. The project period ended on 9/30/2021. As of 9/23/2021, \$583,082.80 in funding was drawn down. Following receipt of the final invoice from our QEP, the remaining balance of \$16,917.20 was drawn down, resulting in a current balance of \$0 and expenditure of 100% of grant funds. We are in the process of completing the final project report and closeout of the grant. 87% of grant funds were expended on BF-00E02372 CA Work Plan Tasks 2 (Phase I ESAs) and 3 (Phase II ESAs). Information for all assessed sites is current in ACRES.



# **THRESHOLD CRITERIA**

## THRESHOLD CRITERIA FOR REVOLVING LOAN FUND GRANTS

### 1. Applicant Eligibility

Prairie Hills Resource Conservation & Development, Inc. (Prairie Hills) is a regional government entity that is governed by representatives from the County Boards and Soil and Water Conservation Districts for six counties in west central Illinois (Fulton, Hancock, Henderson, Knox, McDonough, and Warren Counties). As such we meet the definition for a general purpose unit of local government as that term is defined in 2 CFR § 200.1.

In addition, we are a nonprofit organization as described in section 501(c)3 of the Internal Revenue Code. Therefore, we are eligible to receive a USEPA Revolving Loan Fund (RLF) grant to support cleanup of brownfields. Documentation is provided in **Attachment A**.

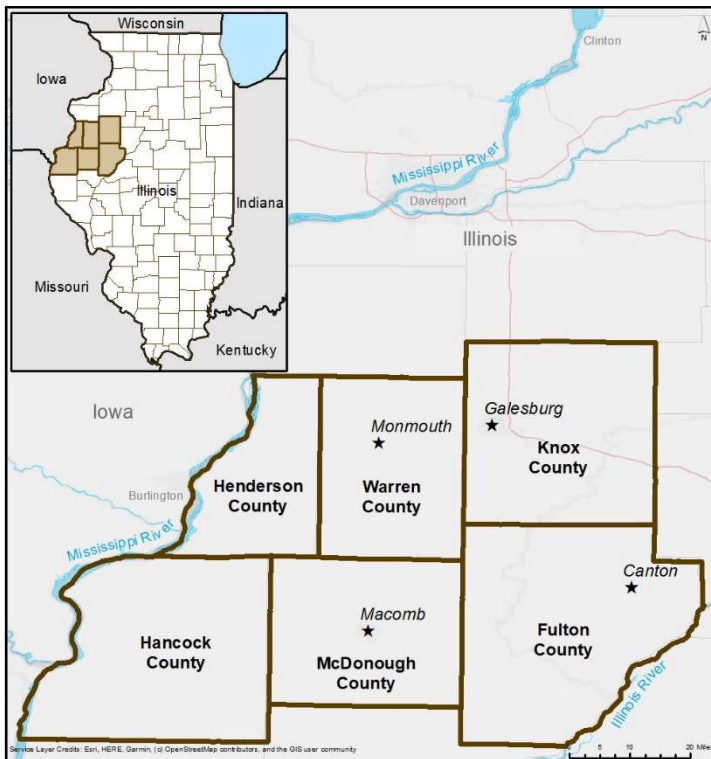
### 2. Demonstration of Previous RLF Grant Status

Not applicable – Prairie Hills has not been a past recipient or member of a coalition for a previous USEPA Brownfields RLF Grant.

### 3. Expenditure of Existing Multipurpose Grants

Not applicable – Prairie Hills does not have an open USEPA Brownfields Multipurpose Grant.

### 4. Description of RLF Boundaries



Prairie Hills is a regional non-profit economic development and conservation organization, established in 1976, that serves a 3,945-square mile area in western Illinois that includes 6 counties (Fulton, Hancock, Henderson, Knox, McDonough, and Warren) as well as 68 cities and villages. Therefore, our "jurisdictional boundaries encompass the full six-county area, as illustrated on the map below.

### 5. Oversight Structure and Legal Authority for Manage a RLF

#### a. Oversight Structure

All loan or subgrant recipients will be required to enroll in cleanup programs overseen by the Illinois Environmental Protection Agency. In addition, Prairie Hills retain an environmental consultant to provide additional technical expertise

relevant to environmental cleanups, and ensuring that cleanups are: (a) protective of human health and the environment, and (b) being performed in accordance with approved plans and applicable environmental requirements. The environmental consultant will be retained through a competitive procurement process that is compliant with applicable provisions of 2 CFR §§ 200.317 through

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Prairie Hills Resource Conservation & Development, Inc.

200.326, and which is completed prior to the beginning of cleanup activities supported by the RLF grant.

**b. Legal Authority to Manage a Revolving Loan Fund**

A legal opinion from our legal counsel is presented in **Attachment B** which demonstrates Prairie Hill's legal authority to: (1) access and secure sites in the event of an emergency or default of a loan agreement or non-performance under a subgrant, and (2) perform the actions necessary to manage an RLF. As noted in the application narrative, over the past 20 years, we have successfully managed and implemented an existing small business RLF local program funded through USDA funds that has provided over \$21.6M in loans to 72 businesses.

**6. Statutory Cost Share**

The statutory cost share of 20% (\$200,000) will be provided through loan-grant agreements that require a match from the recipient for eligible and allowable expenses. This will be accomplished by in part by pairing the awards of RLF funds with (1) state brownfield or other grants or loans used to fund eligible cleanup activities, (2) tax-increment financing (TIF), (3) requiring the recipient to provide a match of 20% in money, labor, materials, or services, or (4) a combination of each of the options. Prairie Hills will ensure that the 20% cost share meets the US EPA definition of an eligible and allowable expense.

**7. Named Contractors and Subrecipients**

Not applicable – no contractors or subrecipients are named in this application.

**ATTACHMENTS TO THRESHOLD CRITERIA RESPONSE**

A – Documentation of Applicant Eligibility

B – Legal Opinion Letter