RANKING CRITERIA 1: PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION:

a. Target Area and Brownfields (15 Points)

i. Background and Description of Target Area

The City of Sterling (population 14,810[1]) has long been associated with the manufacturing of hardware and steel, even at one time titled the "The Hardware Capitol of the World." Sterling was home to Northwestern Steel and Wire, R. B. and W. Bolt and Nut Company, Lawrence Brothers, National Manufacturing Company, Frantz Manufacturing Company, Charter Wire Products Company, and the Wilburt Vault Company. The Lawrence Brothers hardware company played a vital role in the development of the City of Sterling from 1876 to 2006, both economically and architecturally. With its original patents in barbed wire and steel barn door hangers, to a robust product catalog including thousands of items, the Lawrence Brothers company established the Sterling area as a hardware manufacturing epicenter whose products were distributed worldwide. The Lawrence Brothers began construction of their flagship complex located at 2 1st Avenue in 1910 along the Rock River riverfront. This building was operational for nearly 100 years, and defined the City's riverfront manufacturing development.

The hardware manufacturing industry, which served as the Sterling's primary economic driver for decades, has nearly disappeared altogether. Starting in the 1980's, the Sterling region lost 11% of all manufacturing jobs in the area, and that trend unfortunately continued. This sharp economic downturn brought the City of Sterling and surrounding region significant state and national attention as the unemployment rate in the area rose up to nearly 20% in 2010, which was double the rates of the state and nation at the time. Even today, the City of Sterling has an estimated rate of 12.3% of individuals living below the poverty line.

With the manufacturing businesses, such as Northwestern Steel, National Lock and Lawrence Hardware, closing their doors, the City of Sterling has an abundance of abandoned, vacant, and potentially contaminated properties located along their riverfront, which is the target area of this application. The former Lawrence Brothers Hardware site, which is the subject of this Cleanup Grant, is one of those vacant facilities located along the downtown riverfront. Including the former Lawrence Brothers site, there are fourteen (14) other brownfield sites located along the riverfront. The riverfront target area that includes the Lawrence Brothers site is comprised of a 31% minority population, a 67% LMI population[2]. Children under the age of 5 and people over the age of 65 make up a significant portion of the population, combining for approximately 51% of total people in the targeted area.

The Rock River, while an important feature in defining the character of the City, is not a celebrated or well-used feature of the community. Despite having several handsome, historic buildings and bridges, much of the riverfront has a raw, unkept appearance due to the City's industrial history, and is lined by declining and defunct industrial facilities. Debris has collected along the riverbanks and large areas of the riverfront are privately controlled, meaning they are typically fenced off and inaccessible to the public. The Rock River riverfront, with all of its revitalization potential for the community, lacks a sense of entry or arrival, and a large span of land along the river remains

[1] US Census, 2018 ACS Data https://data.census.gov
[2] HUD GIS Mapping for LMI http://hud.maps.arcgis.com/apps/Viewer/index.html?appid=9642c475e56f49efb6e62f2d8a846a78

tragically underutilized. Moreover, the lack of public space along the Rock River downplays one of the City's most remarkable natural resources.

ii. Description of the Brownfield Site

The subject of this Cleanup Grant proposal is the former Lawrence Brothers Hardware site, and specifically Building 3. As you cross the Illinois State Route 40 Bridge into Sterling, the first thing you see off to the east is a multi-story factory complex positioned at the water's edge that stretches for 3 football fields along the Rock River. This is the Lawrence Brothers site. Broken windows, peeling paint, cracks, spalled concrete revealing rebar, and small trees growing from the site's rooftops greet visitors and citizens alike to Sterling. The community has become increasingly vocal that something needs to happen with Lawrence Brothers Hardware; what was once a pillar of steady employment for the community, is now a major eyesore that is hindering vital riverfront redevelopment for the City as a whole.

The former Lawrence Brothers Hardware site is located on the north side of the Rock River in downtown Sterling, Illinois, and has been vacant since hardware manufacturing operations were discontinued in 2006. The City of Sterling took ownership of the former Lawrence Brothers property via abandonment procedures in 2011. The former Lawrence Brothers complex is absolutely massive in size, consisting of approximately 238,440 square feet and sitting on 2.9 acres directly on the Rock River. From west to east, there are five buildings, all attached to each other. There is a three-story building on the eastern end of the site, and that three-story building is the subject of this cleanup grant, based on the outcomes of a Phase II Environmental Site Assessment of the entire complex.

The subject site is comprised of an approximately 0.37-acre portion of the former Lawrence Brothers Hardware facility, consisting of a three (3)-story, vacant industrial structure with a footprint covering approximately 32,790 square feet. The subject site is located on the east side of First Avenue (Illinois Route 40) in downtown Sterling, Illinois, along the Rock River. The Property is adjoined to the north by Union Pacific Railroad right-of-way followed by commercial development; to the east and west by remaining portions of the Lawrence Brothers Hardware facility; and to the south by the Rock River. Due to the historic use of the property, there are suspected contamination impacts to the soil, groundwater and the building itself. Asbestos and lead based paint are also of concern. Metal plating and various forms of metal finishing occurred throughout the complex over time. Huge machines still sit inside the building, as they did when the facility was operational. With the building being located on the Rock River riverbank, we are particularly concerned about the contaminant impact to soil, groundwater, and river water.

The proposed cleanup project will take place at one (1) of the five (5) interconnected buildings comprising the former Lawrence Brothers Hardware facility. Excluding the boiler house structure, the proposed cleanup project activities will be conducted in Building 3 that is the easternmost structure in the facility. A Phase II Environmental Site Assessment conducted on the Property on behalf of the City of Sterling in April 2019 tested for VOCs, SVOCs, PCBs, and RCRA metals. The assessment identified polynuclear aromatic hydrocarbons (PNAs) and select Resource Conservation and Recovery Act (RCRA) metals in soil and groundwater at concentrations exceeding the applicable Tier 1 remediation objectives (ROs) established in 35 Ill. Adm. Code Part 742, Tiered Approach to Corrective Action Objectives (TACO). In addition, cadmium was

identified on one area at hazardous levels that require cleanup. Furthermore, an asbestos inspection identified asbestos-containing building materials (ACBMs) in the Property building that will require abatement.

b. Revitalization of the Target Area (20 Points)
i. Reuse Strategy and Alignment with Revitalization Plans

Since 2006, the City of Sterling has undertaken a number of activities to improve the appearance and redevelopment potential of the Sterling riverfront, including demolition, environmental assessments, and a district-wide redevelopment plan. In 2011, the City commissioned a Downtown Riverfront Redevelopment Plan, and in 2014, the City had an Adaptive Reuse Study for the Stanley-National and Lawrence Brothers sites prepared. Sterling City officials have stressed the need to address the former Lawrence Brothers complex, and the pressure to improve the impressions of residents and visitors to the City has come from within and outside of the City. In 2020, the City of Sterling contracted with Gary W. Anderson Architects and Hunden Strategic Partners to progress the riverfront redevelopment efforts with their "Riverfront Reimagined" plan. This plan will lead the City's reuse and revitalization plans for the Lawrence Brothers site and the surrounding riverfront area. This plan has developed a revitalized riverfront, linked with the Sterling downtown, that locals and visitors alike can use for professional, residential, and recreational activities.

The City's revitalization plan consists of a concept for reuse of the former Lawrence Brothers site without extensive demolition, which is a more eco-friendly and sustainable approach. By reusing the existing buildings, the project can utilize the water and sewer infrastructure that leads to the site, along with roadway access from Illinois Route 40. The initial plans for reuse would be mixed-use, including office space, a boutique hotel, banquet facilities, restaurant, residential lofts and the conversion of a portion of the building for a parking deck. A River Walk is another reuse option for the site. The Sterling community has expressed a desire for a publicly accessible riverfront that is highlighted by gathering places and recreational opportunities. Incorporating additional parks and open space can help reinforce the distinctiveness of the area and attract outside visitors. Recently an adaptive reuse developer, Gorman & Company (gormanusa.com) has toured the complex and expressed strong interest in redeveloping the entire complex in a similar fashion to what the City has envisioned for years.

This site is located in a federally designated floodplain. However, the way the building is situated at the river's edge and based on its design, it does not need to be flood-proofed. Water does not enter building. The windowsills act as a flood wall, and the building is protected. Fill will not be required or allowed for the planned redevelopment of the building, but the floodplain designation for the site has been a factor in reuse plans.

As the City of Sterling faces a challenging economic climate and an underutilized, blighted downtown/riverfront area, it has identified the redevelopment of the Lawrence Brothers Hardware site along the Rock River as a key component to its economic recovery and growth. To ensure

that this project moves forward, the City of Sterling has completed Phase II Environmental Site Assessment activities using local funds. This work provided critical information on the location of environmental impacts, the media that is impacted, and the contaminations of concern that exist.

ii. Outcomes and Benefits of Reuse Strategy

As part of Sterling's "Riverfront Reimagined" Plan, the reuse planned for the former Lawrence Brothers site is a community-approved redevelopment vision for the riverfront. With the completion of the Phase II site assessment, the environmental condition of the site is now better understood for the very first time, which has allowed for conversations and site visits with Gorman & Company, a nationally known redevelopment firm to occur. Gorman & Company has strong interest in the site. Without the pursuit of cleanup funding, the developer would not be interested in the site. The initial plans for reuse would combine mixed-use development, including office space, a boutique hotel, banquet facilities, restaurant, residential lofts, parking deck, and potential river walk. This redevelopment strategy for the former Lawrence Brothers site that will help eliminate public health concerns, and most importantly, redevelop the property into a productive end use, allowing the City to provide more jobs and recreational opportunities for their residents.

Redeveloped properties improve property values, provide more housing options, and expand the tax base. The primary economic benefit of redeveloping this site through this program will be the resulting job creation and expansion of the City's tax base. The Estimated Assessed Value (EAV) of the Lawrence Brothers Hardware site at the time of its closure was $38,093. The estimated EAV of the site after it's fully redeveloped is estimated to be in the tens of millions. While Sterling does not have an opportunity zone site, the City of Rock Falls, Illinois does, and it is located directly across the river from the Lawrence Brothers site. The proposed project will directly help spur economic growth within Rock Falls' Opportunity Zone. With the planned end use being a mixed use facility, the infusion of jobs due to the redevelopment of site will be very positive. The redevelopment would also support local businesses by providing amenities to their traveling employees and local employees, that do not currently exist. The City of Sterling anticipates that this project will then encourage and inspire hope to return to the economy of Sterling.

c. Strategy for Leveraging Resources (15 Points)

i. Resources Needed for Site Reuse

The City of Sterling has been successful in leveraging other funding resources to complete brownfield assessment, remediation, and redevelopment activities in the City. Sterling has leveraged over $1,000,000 in funding for assessments, investigations, and cleanups since receiving their first grant in 2003, which primarily focused on the truly massive former Northwestern Steel & Wire plant. Sterling plans to pursue TIF funds, Enterprise Zone incentives, local Revolving Loan Funds, State and Federal Historical Tax Credits, New Market Tax Credits, Foreign Trade Zone funding, CDBG public infrastructure funds, Department of Transportation road and streetscaping funds, IDNR park and trail funds, and private investment dollars as components of the total financial redevelopment package. The City of Sterling will be providing a 20% cost share for this project, and have included a copy of Resolution #R2020-09-21 in the proposal attachments, committing their cost share.

ii. Use of Existing Infrastructure

This cleanup grant will funnel investment to a site that is served by existing infrastructure, thereby minimizing consumption of local resources and reducing sprawl of a "Greenfield" site. One of the key goals of Sterling's Brownfields Program, as found in the Riverfront Reimagined plan, is to make the City as a whole more sustainable by capitalizing on the advantages of reusing existing infrastructure. A specific example is the re-use of the on-site production well for ground-thermal heating and cooling which can reduce costs by up to 30%. Incorporating the key principles of "smart growth" into the development decisions of the City's Brownfields Program will help foster the type of forward thinking and progressive leadership the City's communities need to help assess and revitalize Brownfields. In addition, by adaptively reusing existing buildings over new construction, the project will both preserve historic architectural treasures in the community and reduces construction waste and demolition disposal.

RANKING CRITERIA 2: COMMUNITY NEED & COMMUNITY ENGAGEMENT:

2a. Community Need (5 Points)

2.a.i. The Community's Need for Funding

The depressing economic and financial effects that brownfield sites have on the City of Sterling is most clearly illustrated by the economic statistics generated by the 2018 American Community Survey US Census Data. Sterling is plagued with a city-wide poverty rate of 12.3%, and the affected neighborhoods directly surrounding the former Lawrence Brothers site shows a jarring 19.23% poverty rate. As would be expected, Sterling's per capita and median household incomes are a mere fraction of the National, State, and County averages. The City's Median Household Income is $44,487, compared to the State at $63,575 and the US at $60,293. Sterling's Per Capita Income is $25,700, while the State is $34,463 and the US is $32,621. This income disparity is more heartbreakingly true for the affected neighborhoods closest to the former Lawrence Brothers site, which is Census Tract 11, Block Group 5. This area has a 19.23% poverty rate, a Per Capita Income of $18,022, and a Median Household Income of $47,448.

The economic impact of brownfields on the City of Sterling is pervasive and adversely affects employment, investment, and property values in the City. The significant decline in manufacturing throughout the area is heavily felt in the City of Sterling. Recent examples include the closure of the Northwestern Steel and Wire facility, resulting in the loss of 1,400 jobs, as well as the closure of the General Electric Plant and the Tyco-Penberthy facility, resulting in the loss of nearly more 200 jobs. This job loss is traumatic for Sterling. Poverty and unemployment rates in Sterling and the affected neighborhood specifically, are markedly higher than the national and state averages and are much slower to recover. The City needs to create conditions that encourage local entrepreneurs and small business owners to establish and grow in the region. Without the assistance that this grant funding request would provide, it will be impossible to safely and successfully renovate the former Lawrence Brothers site into a healthy, beautiful community asset as illustrated in the Riverfront Reimagined plan for the site. To see the planned reuse of the former Lawrence Brothers site realized, private investment will be a necessity, and in order to attract investment for the end-use of the property, the full environmental condition must be understood.

2.a.ii. Threats to Sensitive Populations (15 Points)

(1) Health or Welfare of Sensitive Populations

The City of Sterling is home to many sensitive populations, including children, senior citizens over the age of 65, minorities, and women of child-bearing age. 27.7% of Sterling's population is

composed of children under the age of 18 years old. Women of child-bearing age make up 31.2% of the City's population, and 20.7% of the population is made up of senior citizens over the age of 65. Additionally, the City of Sterling has a significant, growing Hispanic population, accounting for 25.3% of the City's population. In the affected neighborhood directly adjacent to the Lawrence Brothers site, Census Tract 11/Block Group 5, the Hispanic population is 30%, children under the age of 5 and people over the age of 65 make up a significant portion of the population, combining for approximately 51% of total people in the targeted area.[3] There is also a YMCA pre-school located four blocks from the project site.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

The riverfront target area has a 25% higher cancer risk than other areas of the City. In addition, in comparison to the State of Illinois, the affected neighborhood in Sterling is in the 86th percentile for traffic related diesel particles in the air (due to the major roads and heavy truck traffic), and in the 71st percentile for lead paint indications, due to the percentage of housing stock built before 1960. [4] While the City keeps the Lawrence Brother site locked and secure, trespassing and vandalism still happens; this exposes the trespassers directly to serious adverse health situations from the contamination of the various hazardous substances present within the buildings and the Rock River to further potential contamination if trespassers dump anything from the buildings into the river. There have been two fires in the Lawrence Brothers' main building since the City took ownership in 2011. Both times local youths broke into the Lawrence Building and set fires. Not only was the fire a risk, but exposure to contaminants within the building are a continuing problem for City, as the building continually experiences trespassers. The site is also located in a federally designated floodplain.

(3) Disproportionately Impacted Populations

The affected neighborhood directly surrounding the former Lawrence Brothers site has a 49% minority population total (30% of which are Hispanic and 5.8% of what are African-American), a poverty rate of 19.23%, and 67% of the neighborhood classified as low-income[5].

2.b. Community Engagement (15 points)

2.b.i. Project Involvement

2.b.ii. Project Roles

Partner Name	**Point of Contact (name, email, and phone)**	**Specific Role in the Project**
Gorman & Comopany		Potential Lawrence Brothers Site Developer
Greater Sterling Development Corporation	Heather Sotelo Phone: 815-625-5255; Email: hsotelo@sterlingdevelopment.org	Marketing of project site and the City's other downtown vacant properties & redevelopment sites. Business attraction, expansion & retention; Entrepreneurial development & recruitment

[3] US Census, 2018 ACS data

[4] US EPA's EJSCREEN website is ejscreen.epa.gov/mapper

[5] HUD LMI Tracker: https://hud.maps.arcgis.com/apps/webappviewer/index.html?id=ffd0597e8af24f88b501b7e7f326bedd

Sterling Today, Inc.	Janna Groharing Phone: 815-626-8610; Email: janna@sterlingmainstreet.org	Work with Sterling Business community to invite to public input events and connect new businesses to redeveloped property site
Economic Growth Corporation	Brian Hollenback Phone: 309-794-6711 Email: bhollenback@growthcorp.org	Community Meeting hosts; New Business contacts for redeveloped property site
Sterling Kiwanis	Marie Rombouts Phone: 815-632-6629 Email: mrombouts@sterling-il.gov	Promote City's efforts in cleanup of brownfield sites; Obtain resident and property owner input on proposed acquisitions by City for redevelopment projects
Sterling Optimists	Joe Martin Phone: 815-626-6730; Email: Cardinaljoe7@yahoo.com	Promote City's efforts in cleanup of brownfield sites; Obtain resident and property owner input on proposed acquisitions by City for redevelopment projects

2.b.iii. Incorporating Community Input

The City of Sterling will include the affected neighborhood and their respective residents, property owners, and business owners as vital partners in their cleanup and reuse plans. Neighborhood organizations and citizen's groups will have the opportunity to express their concerns, identify their needs, and create and implement reuse plans. The City of Sterling has partnered with their Project Partner organizations to assist with community notification efforts. As Sterling moves forward with the cleanup, the City will hold three (3) public meetings and develop three (3) fact sheets on the status of Brownfield cleanup activities at important junctures. The City will post these fact sheets on our website and utilize any necessary social media to notify the public with a link to the City webpage. If the City is awarded this grant, they will continue with the utilization of diverse notification methods (i.e. social media, website, postings) to ensure that they reach a broad audience. It will also be a priority for Sterling to describe their activities, and progress in ways that are easily understood by its residents, who will most likely be unfamiliar with environmental and scientific terminology. There is a significant Hispanic population in Sterling, so the City will also need to translate all community notification efforts into Spanish. In addition, the City of Sterling will seek out translation services for any households directly impacted by any cleanup or remediation work.

RANKING CRITERIA 3: TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS:

a. Proposed Cleanup Plan

The proposed cleanup plan is based on the Analysis of Brownfield Cleanup Alternatives (ABCA) prepared for this property. The tasks and activities described below are eligible uses of funds and are specifically designed to be effectively completed within the three-year period of performance. The proposed cleanup plan is as follows:

- **Subsurface Contamination - In Situ Chemical Stabilization and Reliance on Existing Floor as an Engineered Barrier:** Conduct pre-remedial design confirmation sampling to further refine the horizontal and vertical extent of cadmium in soil exceeding the toxicity characteristic threshold and collect volume of impacted soils for bench-scale treatability

testing to specify product dosing. Based on the results, conduct in situ chemical stabilization via injections of a liquid reagent to reduce leachable cadmium and render non-hazardous. Following injection activities, complete further confirmation soil sampling to verify cadmium concentrations are below to the toxicity characteristic threshold. Rely on the existing building slab as an engineered barrier for the remaining soil impacts. This cleanup plan is the most cost-effective approach for addressing the identified subsurface impacts and is anticipated to cause minimal disturbance to the land, river, and surrounding area. Given that the expected redevelopment includes renovation of the existing building, alternatives requiring building demolition (i.e. excavation) are not favorable for the overall project objectives. This plan is also compatible with intended land use and meets the cleanup objectives for the Property in accordance with IEPA Requirements.

- **Asbestos Abatement:** Asbestos-Containing Building Material (ACBM) can be abated by a licensed asbestos abatement contractor. A licensed asbestos building inspector completed an inspection of the proposed property and identified ACBM in window caulk, pipe wrap, and roofing. This alternative removes ACBM from the structure and thereby eliminates potential exposure to asbestos. Abatement is the most effective method of addressing ACBM on the property. Abatement of ACBM is the only effective and implementable option to prevent potential asbestos exposure during and after redevelopment of the Property due to the condition of the ACBM, negating the option for encapsulation.

b. Description of Tasks/Activities and Outputs

Task 1: Program Management
i. Project Implementation: This task includes oversight of the City's Cooperative Agreement with US EPA for this project, ensuring compliance with the Agreement, Work Plan, Schedule, and EPA's regulations. This task also includes preparation/submittal of Quarterly and Annual Reports, MBE/WBE reporting, entering information in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database for the project, procurement of a Qualified Environmental Consultant to lead the project, management of the City's required 20% matching funds for the project, and City of Sterling staff attendance at a US EPA Brownfields Conference, and final closeout.
ii. Anticipated Schedule: This task will start immediately upon project award, and will be ongoing continuously throughout the entire three-year project period.
iii. Task/Activity Lead: This task will be led by City Manager Scott Shumard.
iv. Outputs: Executed Cooperative Agreement, Contract with Environmental Consultant, 12 Quarterly Reports, 3 Annual Reports, 3 MBE/WBE Reports, Quarterly Updates to ACRES, attendance of City Staff at a National Brownfields Conference, and final closeout documentation to US EPA

Task 2: Community Involvement
i. Project Implementation: This task includes cooperation between the City staff, Environmental Consultant, and Project Partners to implement the community involvement plan to inform residents, property owners, and the public about the status of the project. This task also includes website updates and printed public information materials as needed. Public comments, questions, and concerns will be addressed under this task.
ii. Anticipated Schedule: This task will commence immediately upon project award, and will continue throughout the entire three-year project period.
iii. Task/Activity Lead: This task will be led by City Manager Scott Shumard, with assistance from the selected Qualified Environmental Consultant and Project Partners.
iv. Outputs: 3 Public Meetings and Meeting Minutes, 3 Website Updates, 3 Fact Sheets

Task 3: Cleanup Planning
i. Project Implementation: Prior to site remediation work, the Environmental Consultant will prepare a site-specific work plan including the Health & Safety Plan, Quality Assurance Project Plan, finalize the ABCA, and coordinate with the City and development professionals to finalize the cleanup plan. The City will secure all necessary

permits and prepare bid documents to select a competitive, qualification-based Cleanup Contractor in compliance with federal, state, and local procurement requirements.

ii. **Anticipated Schedule:** This task will commence after the City selects a Qualified Environmental Consultant, approximately 90 days after award, and will continue through the rest of the three-year project period.

iii. **Task/Activity Lead:** This task will be led by the Qualified Environmental Consultant.

iv. **Outputs:** Health & Safety Plan, Quality Assurance Project Plan, finalize the ABCA Decision Document, Plans & Specs, Permits, and selection of Cleanup Contractor to perform remediation activities at the project site, and contract documents for the Environmental Consultant

Task 4: Cleanup Activities

i. **Project Implementation:** This task includes the cleanup work, including: conducting in-situ chemical stabilization via injections of a liquid reagent to reduce leachable cadmium and render non-hazardous; following injection activities, complete further confirmation soil sampling to verify cadmium concentrations are below to the toxicity characteristic threshold; rely on the existing building slab as an engineered barrier for the remaining soil impacts; and asbestos abatement at the project site.

ii. **Anticipated Schedule:** This task will commence after the first year in the project period, and will continue until project closeout.

iii. **Task/Activity Lead:** This task will be led by the Qualified Environmental Consultant.

iv. **Outputs:** Pre-Construction Meeting/Minutes, removal of contamination, lab reports, a final cleanup report, 0.37 acres of land remediated, Reuse and Development Plans for site

c. Cost Estimates

Budget Categories		Project Tasks				
		Task 1: Program Management	Task 2: Community Involvement	Task 3: Cleanup Planning	Task 4: Cleanup Activities	TOTAL
Direct Costs	Personnel	$4,000	$2,000			$6,000
	Fringe Benefits					
	Travel					
	Equipment					
	Supplies					
	Contractual	$4,000	$4,000	$20,000	$180,000	$208,000
	Other					
Total Direct Costs		$8,000	$6,000	$20,000	$180,000	$214,000
Total Federal Funding		$8,000	$6,000	$20,000	$180,000	$214,000
Cost Share		$1,300	$1,500	$4,000	$36,000	$42,800
Total Budget		$9,300	$7,500	$24,000	$216,000	$256,800

Task 1: This budget includes $4,000 of City personnel time, and at ~$60/hour, this will provide approximately 40 hours of City staff time for all reporting and cooperative agreement management activities. The remaining $1,600 is for City Staff to attend a National Brownfield Conference.

Task 2: This budget includes $2,000 of City personnel time, and at ~$60/hour, this will provide approximately 25 hours of City staff time for the development of Fact Sheets, Website updates, and conducting Public Meetings. The $1500 cost share under this task will go towards supplies for printing, meetings, fact sheets, and website updates. The $4,000 for contractual work is for 32 hours of Environmental Consultant assistance ($125/hour x 32 hours = $4,000).

Task 3: The $20,000 Contractual Budget will be for the development of the HASP, QAPP, finalization of the ABCA, Plans & Specs and permitting for the project, and assistance with bidding. At $125/hour, this will provide 160 hours of consultant time for this task. The City's $4,000 cost share for this task will go towards bidding fees, providing plans & specs, and time spent selecting the qualified environmental contractor to complete the remediation work.

Task 4: The $180,000 Contractual Budget will be for the oversight of the cleanup by the QEC and the cleanup by the procured cleanup contractor. The amount of time for the oversight will be a function of the schedule the selected cleanup contractor provides.

d. Measuring Environmental Results

To ensure that the City of Sterling achieves the intended results of the cleanup grant and completes the outputs of each task listed above, the City will carefully track, measure, and report project performance through annual reports, quarterly reports, ACRES reporting, and with the implementation of the City's Community Involvement Plan. Quarterly and Annual Reports will cover project progress, any difficulties encountered, a record of financial expenditures, data results, and anticipated further actions. Specific accomplishments, contaminants found, which materials were impacted, and resources required to leverage and complete the planned reuse will all be reported on. This site will be entered into the ACRES database, which will also be utilized to track job creation and acres of land assessed as part of this grant project. Anticipated outcomes from this project include liability protection for the site owner, removal of blight, reduction or elimination of future contaminant exposure, improving community health, and the return of the site to a productive mixed use. These outcomes align with the strategic planning for the project site described in Section 1.b.ii of this proposal.

RANKING CRITERIA 4: PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

4.a. Programmatic Capability (15 Points)

4.a.i. Organizational Structure

Sterling has the ability and capacity to manage this grant. If awarded this funding, Sterling will effectively manage the grant and successfully perform each phase of work on the project. City Manager Scott Shumard will serve as the City's Project Manager for this project, serving as the City's primary contact and responsible for submitting quarterly reports, financial reports, progress reports, and the final summary report to EPA Region 5 Staff with the assistance of the City's environmental consultant. The City has extensive experience facilitating and managing redevelopment projects and will utilize that experience to support the most strategic use of the grant funds. Upon award of the cooperative agreement, City staff will prepare a draft Work Plan. After the US EPA approves the work plan, the City will retain the QEC in compliance with all applicable federal and local procurement requirements. The QEC will assist with grant and program management and will conduct cleanup planning, cleanup activities and participate in project reporting and community engagement activities. The City will work with IEPA to provide independent oversight of cleanup activities conducted under this program, to ensure all assessment is conducted appropriately and with consideration for public health and welfare.

4.a.ii. Description of Key Staff

Mr. Scott Shumard, City Manager, is now serving in his 15th year with Sterling and is very committed to the City's brownfields program. As the City Manager, he oversees a division charged with administering the planning, sustainability, neighborhood program, neighborhood and building inspection functions of the City, and with managing economic and urban development efforts. As the City Manager, he is part of an executive team that manages the day-to-day operations for a municipal government of more than 15,000 residents with an annual budget of approximately $10 million. Other key staff will include Mayor Charles Lee and Director of Finance Cindy Von Holten. The Mayor will assist Shumard with Community Involvement and Reuse efforts. The Director of Finance will be responsible for receiving, tracking, and payment on all financial aspects of the grant project. The City will procure a brownfields consultant that has a proven track record with programmatic reporting with EPA Brownfields grants. The City will adhere to their work plan, schedule, and all terms and conditions required by US EPA. The selected environmental consultant will work closely with IEPA and the assigned US EPA Grant

Manager to oversee and approve remediation activities. Sterling will follow all federal procurement procedures when hiring a brownfields consultant and remediation contractor.

4.a.iii. Acquiring Additional Resources

The City of Sterling will identify, coordinate and leverage any public and private resources needed to complete the described grant tasks. The City will follow EPA's procurement policies to hire a Qualified Environmental Consultant (QEC) to effectively and efficiently manage the City's assessment grant project. Project Partners will assist in providing supplies for community outreach activities, and the City will provide a 20% cost-share for the project to assist with whatever is needed for each project task to ensure the successful remediation and redevelopment of this property.

4.b. Past Performance and Accomplishments (15 Points)

4.b.i. Has Previously Received an EPA Brownfields Grant

(1) Accomplishments

Sterling has received three previous US EPA Brownfields Assessment Grants. In 2003, Sterling was selected to receive assessment and revolving loan fund grants. At that time, the City was focusing on the 700-acre Rock River Redevelopment Area or the Northwestern Steel & Wire site, which is part of a designated Illinois Enterprise Zone. The City received $400,000 in assessment grant funds, and $800,000 in Revolving Loan Funds. In 2006, Sterling received assessment and cleanup funds, obtaining $257,000 in assessment funds and $189,000 in petroleum cleanup funds for the Stormwater Retention Area within the former Northwestern Steel & Wire property. Assessment and remediation activities at the sites have now been completed. To date, all the City's previous grant funding was allocated to the Rock River Redevelopment Area/Northwestern Steel & Wire site. Comprised of 700 acres, all the City's previous grant resources were exhausted at this specific site due its sheer size. Approximately 250 acres of the property is back in use, hosting Sterling Steel Co., Rock River Lumber & Grain, Sterling Rail Services, and a freight car repair shop. Together, these businesses employ over 200 people. By putting these sites back into reuse and pursuing additional USEPA Brownfields grant funding, the City is moving forward with the plans that have been laid out for their Downtown Riverfront Redevelopment Plan. Most recently, we recorded a No Further Remediation (NFR) letter for three (3) parcels for Plant 1 on July 31, 2017.

(2) Compliance with Grant Requirements

Sterling has received three previous US EPA Brownfields Assessment Grants, so they are very aware of the programmatic requirements involved in successfully managing an EPA Brownfields grant. Sterling did have a period of difficulty with Quarterly Reporting during a time of transition, but that issue has been long resolved. The City will pay strict attention to the workplan and comply with the schedule, terms and conditions, and reporting requirements to include quarterly reports, federal financial reports, ACRES, DBE reports, and where appropriate, HASP and QAPP, and finalizing the Analysis of Brownfield Cleanup Alternative (ABCA) report. The City has a positive reputation with US EPA, ensuring to adhere to all requirements to protect the excellent reputation established with its federal partners