



PLANNING & ZONING REPORT

Zoning Board of Appeals Meeting of April 21, 2026

File # 006-26

APPLICANT: Industrial VI Enterprises, LLC c/o Hillwood

LOCATION: 3321 Integrity Drive

REQUESTED ACTION: A Zoning Map Amendment from C-3, General Commercial Zoning District and I-1, Light Industrial Zoning District to I-3, Airport Industrial Zoning District.

EXISTING USE: Vacant land

PROPOSED USE: Industrial facilities for storage and warehousing of goods.

DIMENSIONS: See attached Exhibit C.

ADJACENT ZONING AND LAND USES:

NORTH:	I-2;	Rocky Glen OHV Park
EAST:	RE, I-3, I-2;	Rock River, Industrial Park
SOUTH:	R-3, I-1;	Green Meadows Mobile Home Park, Vacant land
WEST:	C-3;	Loves Truck Center, Vacant land

YEAR 2040 PLAN: T-IL Tech Industry-Light Industry

SOILS REPORT: Report #26-36:
Erosion Concerns

Soil disturbance will occur as a result of developing the site, which is slightly sloping and maybe susceptible to erosion. The area of disturbance will be greater than one acre, so an IEPA NPDES permit will be required; as well as any City/County Permit requirements.

Soil disturbance can create soil erosion, which must be properly managed to prevent adverse environmental impacts. Erosion from construction sites is a leading cause of water quality problems in Illinois. Problems caused by this sediment include:

- increased flooding – Sediment build-up lowers the flow capacity of channels causing more frequent flooding in areas that rarely or never flooded before
- Financial burden to taxpayers - Sediment that finds its way into streets, storm sewers, and ditches result in additional maintenance costs for local, state and federal governments

- Water quality impairment - Sediment laden runoff transfers nutrients and other pollutants to downstream lakes and rivers degrading aquatic habitats and increasing costs for water treatment.

Simple but effective controls include preserving existing trees and grass where possible, using silt fence to trap sediment on the down slope sides of the area of disturbance, using a gravel drive used by all vehicles to limit tracking of mud onto streets, cleaning up sediment carried off-site by vehicles or storms, installing curb inlet controls, using downspout extenders to prevent roof runoff from eroding exposed soil, locating soil piles away from any roads or waterways, and reseeding or sodding the site as soon as possible. The materials (silt fence, stakes, gravel entrance, inlet controls, and grass seed) are easy to find and relatively inexpensive.

The Illinois Urban Manual is a resource of practices used throughout the State and can be accessed at <http://www.aiswcd.org/ium/>. The concept of these practices can be carried over to good housekeeping measures after development occurs and buildings are occupied to prevent storm water runoff from becoming contaminated.

Surface and Groundwater Contamination from Heavy Equipment and Vehicle Traffic

There will be several vehicles moving on and stored on the site. Most of these vehicles are heavy duty pieces of equipment, with high capacity fuel tanks and large hydraulic oil reservoirs. Due to bedrock being at or near the soil surface, absorbents should be readily available in the event of a spill or leak to promptly contain hazards that would otherwise be environmentally harmful to groundwater recharge areas. Personnel should be properly trained to contain and clean up any spills. They should periodically check for indications of leaks or spills under or around vehicles and fix issues to prevent further contamination.

Properly label, store and dispose of all fluids and other hazardous chemicals to avoid environmental contamination. Keep storage containers off the ground to avoid stormwater contamination. Any fuel storage areas should be properly located away from high traffic areas; and have secondary containment.

Prevent stormwater from washing contaminants off the site in the event of a storm. Contaminants on impermeable surfaces (concrete, asphalt, rooftops, etc.) will wash off with rain and will eventually make its way into drainage ways which go directly to natural surface water areas (ditch, creek, river, etc.) without treatment. Avoid washing impermeable surfaces off with a hose, but rather use a broom and dispose of waste versus having contaminants wash off the site.

Farmland Rating

This site consists of 100% prime farmland.

Prime Farmland, as defined by the U.S. Department of Agriculture, is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses. It could be cultivated land, pastureland, forestland, or other land, but it is not urban or built-up land or water areas. The soil quality,

growing season, and moisture supply are those needed for the soil to economically produce sustained high yield crops when proper management, including water management, and acceptable farming methods are applied. Prime farmland is permeable to water and air. It is not excessively erodible or saturated with water for long periods, and it either is not frequently flooded during the growing season or is protected from flooding. Slope ranges mainly from 0 to 6 percent.

A recent trend in land use in some areas has been the loss of some prime farmland to industrial and urban uses. The loss of prime farmland to other uses puts pressure on marginal lands, which generally are more erodible, droughty, and less productive and cannot be easily cultivated.

In some areas, land that does not meet the criteria for prime farmland is considered to be farmland of Statewide Importance for the production of food, feed, fiber, forage, and oilseed crops. The criteria for defining and delineating farmland of statewide importance are determined by the appropriate State agencies. Generally, this land includes areas of soils that nearly meet the requirements for prime farmland and that economically produce high yields of crops when treated and managed according to acceptable farming methods. Some areas may produce as high a yield as prime farmland if conditions are favorable. Farmland of statewide importance may include tracts of land that have been designated for agriculture by State law.

This list does not constitute a recommendation for a particular land use, but emphasizes the significance of prime farmland and farmland of statewide importance to our County

Web Soil Survey. USDA NRCS. <https://websoilsurvey.nrcs.usda.gov/app/>

Stormwater Runoff

Developments have both direct and indirect impacts on water bodies and other valuable natural features. These impacts occur both during construction and after the development is complete. Some impacts result from the direct modification or destruction of streams, lakes, and wetlands. Other impacts occur primarily offsite due to changes in the quality and quantity of runoff from the development.

Stormwater runoff is generated from impervious surfaces, particularly roadways and parking lots. Most modern developments route runoff from impervious surfaces directly into storm sewers or paved channels which effectively convey the pollutants, without any opportunity for infiltration or filtering, into receiving water bodies. These pollutants include dirt, pesticides, fertilizers, road salt, oil, detergents and gasoline that can harm fish and wildlife populations, kill native vegetation, foul drinking water supplies, and make recreational areas unsafe and unpleasant.

Stormwater retention/detention should be required as part of the development of this parcel. Consider incorporating water quality BMP's in the landscape and design. These practices can also be accessed in the Illinois Urban Manual.

Everyone receives stormwater and how it is managed will leave a lasting impact on the quality of water resources. Managing storm water runoff is not just the responsibility of water agencies, municipalities and developers, but rather all of us. It is important that we understand how water quality is impacted by stormwater runoff. Since everyone lives in a watershed, everyone has to take responsibility.

Stormwater is precipitation that, instead of becoming absorbed into soil, runs off impermeable surfaces, like parking lots, that do not allow rain and snowmelt to infiltrate. As areas are developed, fewer areas can soak up the rainwater, resulting in an increase in stormwater runoff.

Stormwater starts clean but may end up polluted by absorbing contaminants such as dirt, pesticides, fertilizers, road salt, oil, detergents and gasoline. As stormwater flows across impervious surfaces, it picks up these pollutants from the surface. Most developed areas rely on storm drains or drainage ditches to carry large amounts of runoff from roofs and paved areas within the entire watershed to nearby waterways. These pollutants can harm fish and wildlife populations, kill native vegetation, foul drinking water supplies, and make recreational areas unsafe and unpleasant.

Hazardous household and automotive chemicals should be stored in sealed, well-labeled containers and be used in accordance with specifications. Check for drips under vehicles and repair leaks immediately to keep oils off pavement. Have a spill response kit readily available with absorbents to properly clean hazardous spills.

Automobiles should be washed on the lawn with a no-phosphate detergent or at a carwash to avoid drainage to lower sloped areas.

Road salt should be used on the parking lot during the winter months according to specifications as the excess will be washed away.

Use lawn and garden chemicals carefully and sparingly. Conduct a soil test of your lawn to know the right amounts of fertilizer to use.

Choose appropriate types of turf grass and groundcovers for your site's soils, sunlight, and water conditions to minimize maintenance and fertilizer and pesticide use.

Keep your mowing height high. Set your mower blade to 3 inches to provide a taller lawn that holds water better, request less irrigation, and helps shade out weeds.

Use a hose nozzle to prevent water from running when not in use.

Woodland Information

The Winnebago County Soil and Water Conservation District encourages preserving as much of the wooded character of this site as possible. Long-term preservation of the trees will require taking certain precautions during and after construction. The ground around each tree to be saved should be flagged or fenced off. Also, it should be protected from heavy

machinery. This area should be at least as wide as the area covered by the spread of the tree branches. Soil compaction around the roots of the trees can permanently interfere with the uptake of oxygen, nutrients, and water. This may cause the premature death of the trees. The placement of fill material around the trunks of trees can have the same adverse effects. Other construction practices to avoid near the trees are: cutting and filling, raising the soil level, and removing neighboring trees. Contractors and construction crews should be informed of all tree preservation efforts.

Tile Investigation

Subsurface drainage is used to remove excess water in poorly drained soils or areas impacted by heavy rain or storm events, such as a grassed waterway. These systems are very common in northern Illinois agricultural fields. When a subsurface drainage system is working correctly, these tiles can improve infiltration rates, reduce surface runoff, and increase water storage capacity of the soil in the fields. In cases where the tile fails upland drainage patterns can be compromised, field will hold standing water for days after a storm event, and large holes where soil has washed into the tile line can appear. All of these problems make it hard for equipment to access the area. Prompt repair of any drain tile failure will keep the system in good working order and prevent permanent damage to it. A tile inspection is recommended for this site in order to identify if and where there are tile lines, so they can be accurately located and maintained throughout the life of the solar facility to minimize potential future damages.

Stream Corridor

A stream corridor refers to rivers, creeks, streams and the adjacent areas that water influences. Streams are among the most important natural resources, their complex ecosystem provides habitat for a diversity of species. Stream corridors have great social, cultural, and environmental value. Healthy streams create critical habitat for fish and wildlife, water for recreational activities and help filter out pollutants. Streams surrounded by a healthy mix of vegetation including grasses, shrubs and trees buffer the effects of surrounding land.

Streams and their surrounding areas can be damaged very quickly, but it often takes much time and effort to repair the damage. Whether it is a natural event or a human induced activity, disturbances bring changes to stream corridors. Disturbances place stress on the stream and have the potential to alter its structure and impair its ability to perform key ecological functions.

Urban development is one of the leading causes of stream degradation. Development increases the amount of stormwater runoff because of impervious surfaces such as parking lots like in the northern half of the site. Increased amounts of impervious surfaces reduce the amount of water that is able to infiltrate into our ground which runs off urban impervious surfaces instead, while washing pollutants away with it.

Contaminated stormwater runoff can reach local water resources if not properly managed. Removing plant buffers along streams prevents vegetation from filtering out pollutants and holding the soil in place.

Maintain the vegetation within the stream corridor for protection against degradation.

Native Plantings

Native plants like grasses and flowers provide critical habitat for many key species like the Rusty Patch Bumble Bee and Monarch Butterflies. These deep-rooted native species are preferred because of their abilities to enhance soil permeability and pollutant filtering and their reduced needs for fertilizer, herbicides, irrigation, and mowing. Unfortunately, loss and degradation due to the development of the land and an invasion of exotic species is a serious problem in Illinois.

HISTORY:

File #033-23: A Zoning Map Amendment from R-1, Single family Residential Zoning District to C-3, General Commercial Zoning District was approved on July 12, 2023 for the property located at 4908 South Main Street. This is three (3) blocks south of the subject property.

File #063-21: A Zoning Map Amendment from Winnebago County RMH and CC to City R-3, Multi-Family Residential, and a Special Use permit for a mobile home park in an R-3, Multi-Family Residential Zoning District was approved on March 21, 2022 for the property located at 4650, 4680, 47XX, 4848 and 49XX South Main Street. This is south of the subject property.

File #010-20: A Zoning Map Amendment from Winnebago County AG, Agricultural to I-3, Airport Industrial Zoning District was approved on June 3, 2020 for property located at 4227 Pelley Road. This is west of the subject property.

File #011-20: A Zoning Map Amendment from I-1, Light Industrial Zoning District to an I-3, Airport Industrial Zoning District was approved June 3, 2020 for the property located at 4711 Pelley Road. This property is located west of the subject property.

File #009-18: A Special Use Permit for a Planned Unit Development to allow a truck stop, convenience store and fast food restaurant, Variation to landscaping and design standards to permit development according to the submitted site plan, Variation to increase the sign height from 8 feet to 30 feet, Variation to increase the maximum square footage for a free-standing sign from 64 square feet to 425 square feet, Variation to allow a pylon style sign with a landmark style base in a C-3, General Commercial Zoning District and I-1, Light Industrial Zoning District was approved on May 23, 2018 for the property located at 4628 South Main Street. This property is adjacent west of the subject property.

File #100-07: A Zoning Map Amendment from County AG, Agriculture District to C-3, Commercial General Zoning Districts for Parcels 1 and 2 and to I-1, Light Industrial District for Parcel 3 was approved on December 11, 2007 for the property located 39XX, 4227 Pelly Road and 4507, 4521, 4701, 47XX South Main Street. This is west of the subject property.

REVIEW COMMENTS: The Applicant is requesting a Zoning Map Amendment from C-3, General Commercial Zoning District and I-1, Light Industrial Zoning District to I-3, Airport Industrial Zoning District. The subject property is located south of

US Highway Bypass 20 and 786 feet east of South Main Street. See attached Exhibit C.

The subject property consists of 85.39 acres of land. The property is west of the Rock River and south of US Highway Bypass 20. The land had been used as farmland for years prior to the development of the Love's Truck Center on the west.

Exhibit D is the Alta / NSPS Land Title Survey of the subject property. The survey includes the area to be sold. The survey was completed on May 9, 2024. The land for sale would consist of 79.08 acres of land. The survey shows the boundary lines and easements. Integrity Drive road dedication ends west of the sale parcel area. Exhibit E shows the FEMA information along the edge of the property adjacent to the river and the southern portion of the property.

Exhibit F is the concept site plan for Phase I of the proposed development. The plan shows the development of the property would happen in two phases. The first phase would include a 334,800 square foot building with 355 parking stalls and 70 trailers. Stormwater management would be constructed on the north side of the property, just south of US Highway Bypass 20. Integrity Drive would be extended east for both phases of the development.

The Applicant submitted a narrative shown as Exhibit G. The narrative indicates the Applicant proposes to rezone the entire property to I-3, Airport Industrial. The property is situated in an area that is close to the Rockford International Airport and at the interchange of US Highway Bypass 20 and South Main Street (Route 2). This location unique location positions the site for air cargo distribution and warehousing. Rezoning the site to the I-3 District allows for more flexibility and will provide more opportunities for new jobs and economic growth.

The site sits adjacent to the interchange of Bypass 20 and Route 2, providing direct access to regional freight routes with truck traffic having direct access to the major highways. In addition, its proximity to Chicago Rockford International Airport makes the property well suited for future uses related to airport-related industrial, logistics, warehousing, and distribution uses that benefit from efficient air and highway connectivity. Rezoning the property to I-3, Airport Industrial, would align the site with surrounding land use patterns, support economic development tied to airport operations, and take advantage of existing infrastructure designed to accommodate the more intense industrial activity in this corridor. Therefore, Staff supports this request.

RECOMMENDATION: Staff recommends APPROVAL of the requested Zoning Map Amendment from C-3, General Commercial Zoning District and I-1, Light Industrial Zoning District to I-3, Airport Industrial Zoning District.

See attached findings of fact.

SC: BM 03/09/2026

FINDINGS OF FACT FOR APPROVAL OF A ZONING MAP AMENDMENT
FROM C-3, GENERAL COMMERCIAL DISTRICT
AND I-1, LIGHT INDUSTRIAL ZONING DISTRICT TO
I-3, AIRPORT INDUSTRIAL ZONING DISTRICT
LOCATED AT 3321 INTEGRITY DRIVE

Approval of this Zoning Map Amendment is based upon the following findings:

- 1). The proposed Zoning Map change is consistent with Article II, Intent and Purpose, of the Rockford Zoning Ordinance for the following reasons:
 - a. This proposal promotes the health, safety, comfort, convenience, morals and general welfare for the citizens of Rockford because it is consistent with the comprehensive plan and surrounding uses;
 - b. This proposal protects the character, scale and stability of the residential because the proposed development will meet all development requirements of this site; and
 - c. The proposed map amendment would allow consistent with the zoning district and uses.
- 2). The proposed Zoning Map Amendment is consistent with the approved general plan, the Year 2040 Plan, for the area. The 2040 Plan designates this property as General Industrial.

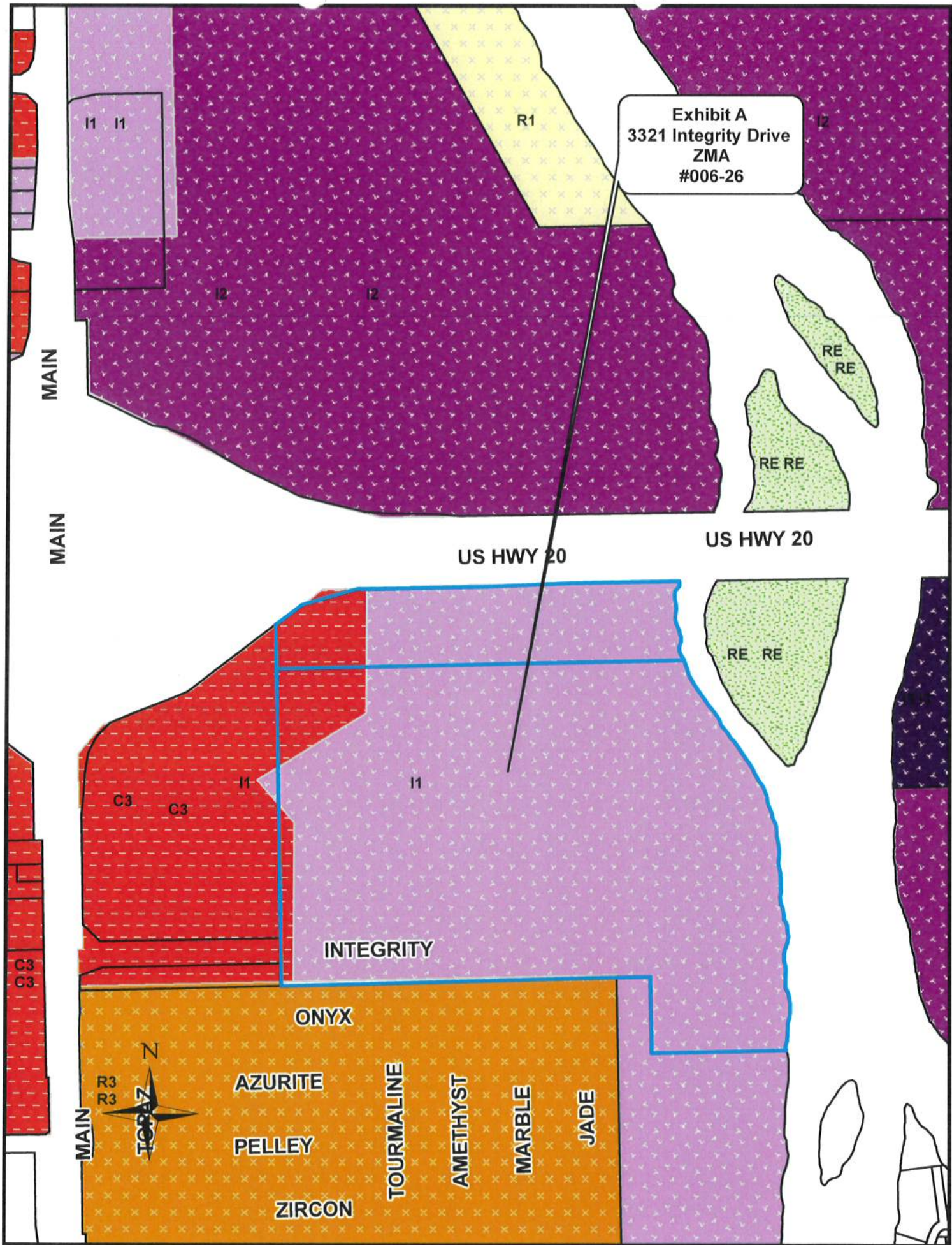


Exhibit A
3321 Integrity Drive
ZMA
#006-26

MAIN

MAIN

US HWY 20

US HWY 20

MAIN



R3
R3

AZURITE

PELLEY

ZIRCON

ONYX

INTEGRITY

TOURMALINE

AMETHYST

MARBLE

JADE

I1 I1

R1

RE
RE

RE
RE

RE
RE

C3
C3

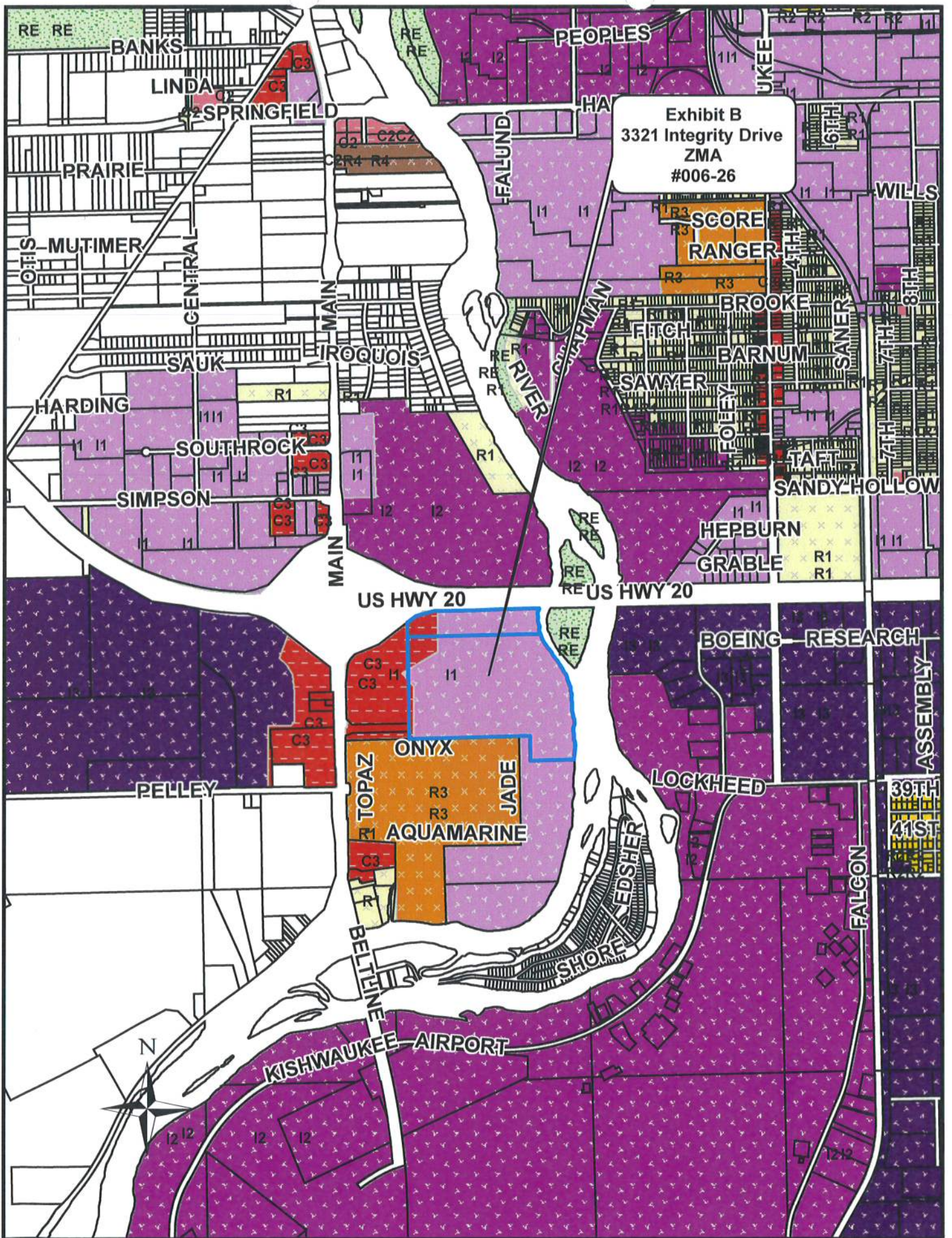


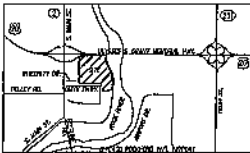
Exhibit B
3321 Integrity Drive
ZMA
#006-26



Exhibit C
3321 Integrity Drive
ZMA
#006-26



ALTA/NSPS LAND TITLE SURVEY



LINE	TYPE	DATE
1	EXISTING	11/15/05
2	EXISTING	11/15/05
3	EXISTING	11/15/05
4	EXISTING	11/15/05
5	EXISTING	11/15/05
6	EXISTING	11/15/05
7	EXISTING	11/15/05
8	EXISTING	11/15/05
9	EXISTING	11/15/05
10	EXISTING	11/15/05

AREA SUMMARY
 TOTAL AREA OF SURVEYED PROPERTY 6,190,207 SQ. FT. OR 141,878 ACRES
 FROM THE LEGAL DESCRIPTION IN THE TITLE COMMITMENT
 LESS AREA NOT INCLUDED AS PART OF THE LAND SALE 2,738,468 SQ. FT. OR 62,788 ACRES
REMAINDER (AREA OF LAND SALE) 3,444,741 SQ. FT. OR 79,090 ACRES

ABBREVIATIONS

(TYPICAL)	ADVERTISE	DECODE	DIMENSIONS
LOC OF	ADVERTISE	MEASURED	CONTOUR
LOC OF	ADVERTISE	MADE	
P.O.C.	ADVERTISE	PARCEL	INDEX NUMBER
P.O.C.	ADVERTISE	SECTION	ADVERTISE
P.O.C.	ADVERTISE	SECTION	ADVERTISE
P.O.C.	ADVERTISE	SECTION	ADVERTISE
P.O.C.	ADVERTISE	SECTION	ADVERTISE
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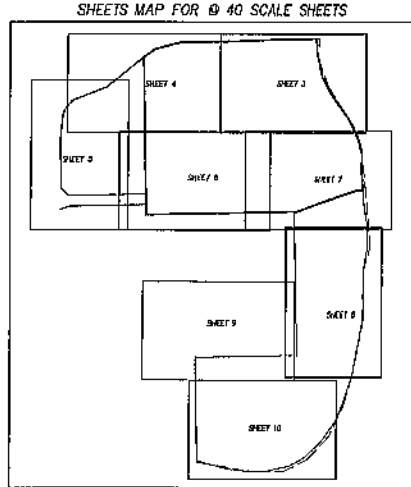
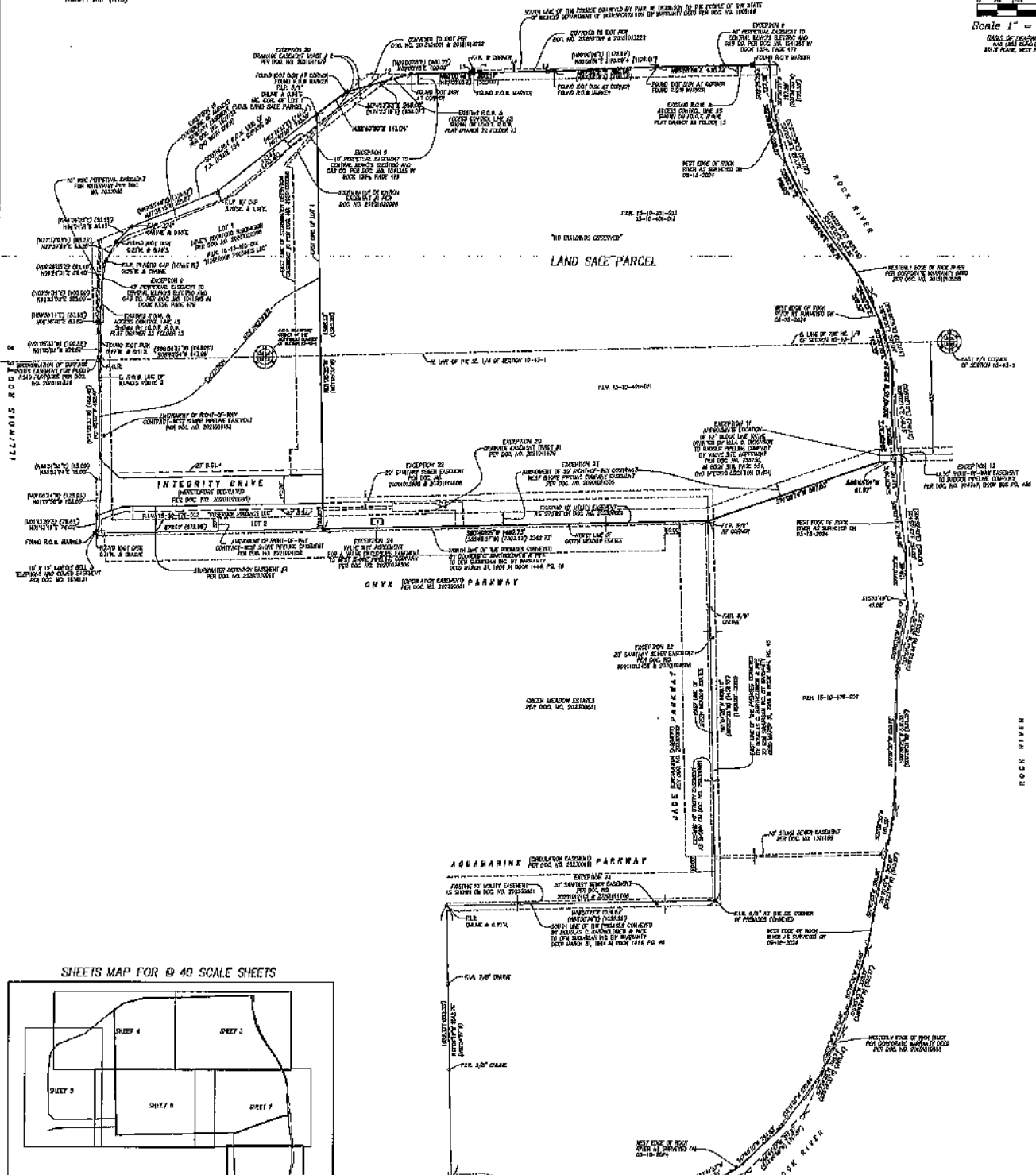
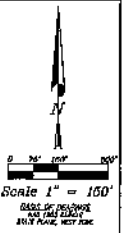
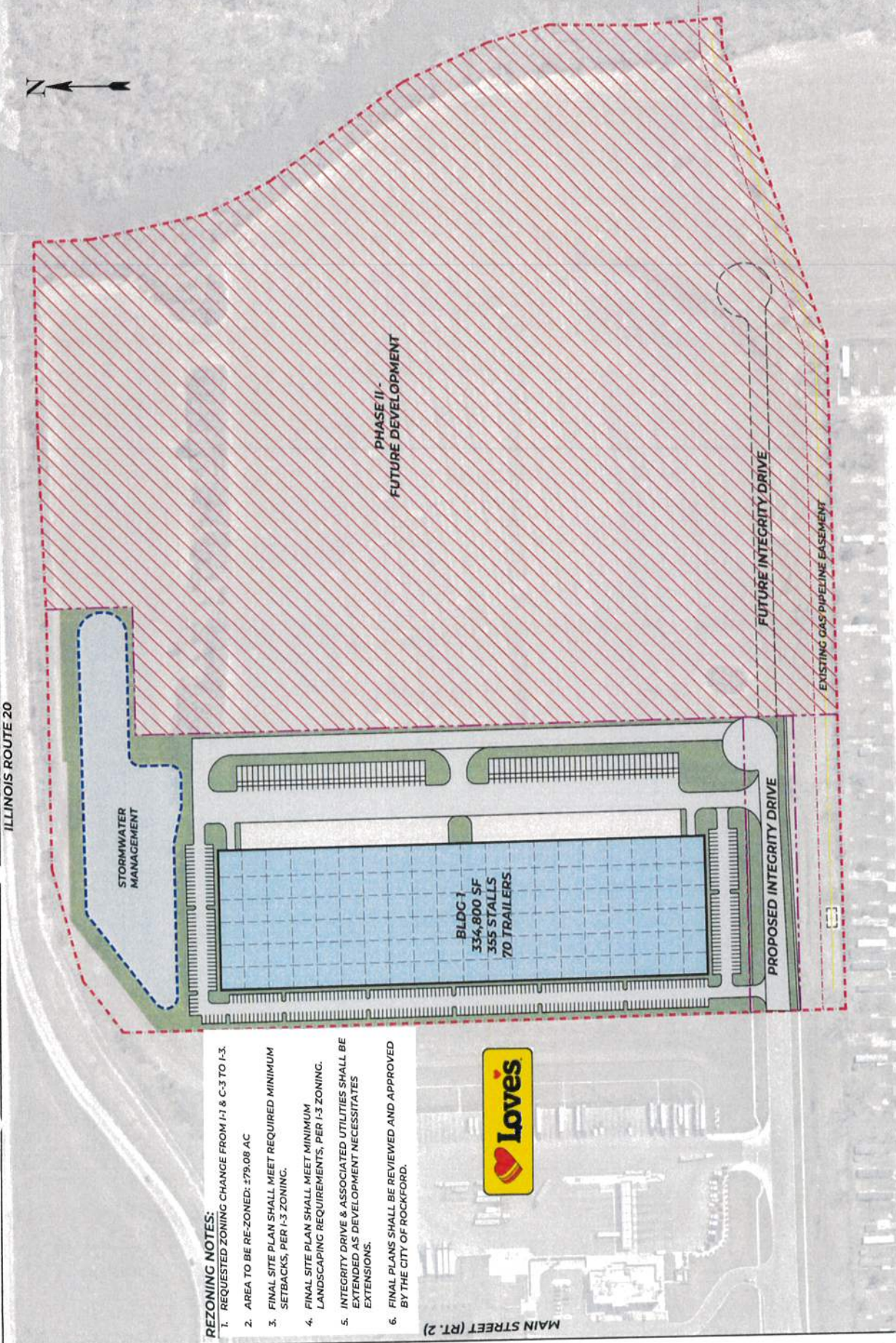


Exhibit D
3321 Integrity Drive
ZMA
#006-26

JACOB & HEINER
 SURVEYORS
 11111 UNIVERSITY AVENUE, SUITE 100
 DENVER, COLORADO 80231
 TEL: 303.733.8888
 FAX: 303.733.8889
 WWW.JACOBHEINER.COM

Survey No:	00626
Drawn By:	TELEPHOS
Checked By:	ALAN/JOE HAYES/STEFANIE
Date Prepared:	JULY 8, 2004
Scale:	1" = 150'



- REZONING NOTES:**
1. REQUESTED ZONING CHANGE FROM I-1 & C-3 TO I-3.
 2. AREA TO BE RE-ZONED: 479,08 AC
 3. FINAL SITE PLAN SHALL MEET REQUIRED MINIMUM SETBACKS, PER I-3 ZONING.
 4. FINAL SITE PLAN SHALL MEET MINIMUM LANDSCAPING REQUIREMENTS, PER I-3 ZONING.
 5. INTEGRITY DRIVE & ASSOCIATED UTILITIES SHALL BE EXTENDED AS DEVELOPMENT NECESSITATES EXTENSIONS.
 6. FINAL PLANS SHALL BE REVIEWED AND APPROVED BY THE CITY OF ROCKFORD.

MAIN STREET (RT. 2)

Exhibit F
3321 Integrity Drive
ZMA
#006-26

Rezoning Narrative

The majority of the subject parcel is currently zoned I-1 (Light Industrial), with remnant portions of the property zoned C3 (General Commercial) along the western boundary. The applicant proposes to rezone the entirety of the subject parcel to I3 (Airport Industrial).

The subject property is strategically located between Rockford International Airport and the four-way interchange of Main Street and Route 20. This location uniquely positions the site to serve potential air cargo users seeking distribution/warehouse space outside the airport fence limits, as well as traditional warehouse/distribution users seeking a facility conveniently located near the I-39 and I-90 corridors. The I3 zoning classification provides the necessary flexibility in facility design standards and permitted uses to accommodate a wide variety of potential tenants.

Because this property is being developed on a speculative basis, this zoning flexibility is essential to maximize leasing potential. A fully leased building provides opportunities for new local jobs and economic growth for the City of Rockford, the Rockford International Airport, and the broader community.

Exhibit G
3321 Integrity Drive
ZMA
#006-26