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May 8, 2026

Mayor and City Council of
The City of Rockford, Illinois

c/o

City Clerk
City of Rockford
425 E. State Street
Rockford, IL 61107

CC: City of Rockford Zoning Board

RE: Proposed South Rockford Industrial Redevelopment Project Area

Dear Mayor and Alderpersons:

As President of the Board of Commissioners of the Forest Preserves of Winnebago County (the "District"), and on behalf of the members of the Board of Commissioners, I am writing to express the District's objection to the formation of the South Rockford Industrial Redevelopment Project Area ("RPA").

Of primary concern for the District is the potential development of properties within the RPA for industrial use. The District's Kilbuck Bluffs Forest Preserve is located adjacent to the RPA and industrial development could have environmental impacts on the Kilbuck Bluffs Forest Preserve. With the properties within the proposed RPA being zoned the City's I-2, General Industrial District, industrial uses could include Intensive Manufacturing, Intermodal Cargo Transfer Facilities, Junk/Salvage Yards, and Sanitary Landfills. Any of these potential industrial uses could have negative effects such as increased noise, air, water and light pollution and changes to aquifer and surface water hydrology at the Kilbuck Bluffs Forest Preserve.

Kilbuck Bluffs Forest Preserve and Kilbuck Creek, provide immeasurable ecological services that have local impact as well as benefits well beyond our borders. The existing high-quality habitat provides for flood control, carbon sequestration and reduces negative impacts to pollution. Within these areas are incredibly diverse ecosystems containing hundreds of species of animals. Some of which are species of concern. We have documented populations of bats, pollinators and freshwater mussels in the Kilbuck area, to name a few. Just as important, is that development activities within the TIF district will have impacts to larger watersheds such as the Kishwaukee and Rock Rivers which provide their own ecological benefits.

We further recognize that the landholdings within the TIF district currently provide additional ecological services in the form of stream corridors, wetlands and woodlands. Substantial protections of these sensitive habitats within the TIF district need to be recognized, and plans implemented, prior to development negotiations.

We understand that the vast majority of the properties within the proposed RPA are currently located within an existing City of Rockford Industrial Jobs Recovery Law TIF district (the Global Tradepark South TIF). As a part of the formation of the Global Tradepark South TIF on December 19, 2011, these properties were annexed into the City and zoned I-2. While we understand that the 23-year life of the Global Tradepark South TIF has approximately 8 years remaining, the formation of the proposed RPA would in essence reset the 23-year life of the TIF district. From the District's perspective, another 23 years of potential economic incentives to spur potentially environmentally detrimental industrial development next to the Kilbuck Forest Preserve is unacceptable.

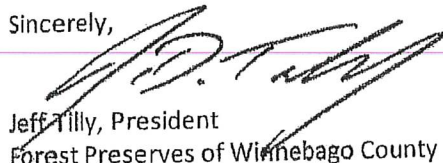
Additionally, it is our understanding that little to no development has occurred in the first 15 years of the Global Tradepark South TIF formation. Why would the City create a new 23-year TIF district when the first TIF district has failed to yield any development in 15 years? Over the course of 15 years, approximately \$360,511 of TIF funds has been generated. That is \$360,511 that the taxing districts within the Global Tradepark South TIF have given up and could have otherwise utilized for their taxpayers.

The District has heard the talks of a proposed data center to be located in South Rockford and the District understands that economic incentives (through a TIF district) may be necessary to bring this development to fruition. That said, the District would ask the City to consider reducing the boundary of the proposed RPA to an area just needed for the data center. We would also ask that our District be allowed to have representation on any development committee that may be instituted for projects within the TIF area.

Finally, while the District understands that TIF districts can be created over vacant lands that meets the eligibility criteria under the TIF Act, the District believes that a more appropriate use of TIF districts is for revitalization and rehabilitation of urban areas where blight and underperforming areas are present. The District does not believe that a TIF district should be used to spark new developments or infrastructure expansion into rural and/or nature sensitive regions.

The District thanks you for your consideration and if you have any questions, please feel free to contact me.

Sincerely,



Jeff Tilly, President
Forest Preserves of Winnebago County