Appendix E

Presentation on Concept Site Plan
Riverfront Park Extension
Public Meeting

January 6, 2016: 6 p.m.: Council Chambers

Meeting Agenda

• Introduction of Issue
• Recap of Efforts To Date
• Overview of Concept Site Plan
• Feedback
• Next Steps
Why are we here?

- City seeking to sell 5.844 acres of Riverfront Park to private developer for construction of 144 apartments
- Federal and state requirement to get approval of a replacement plan prior to land being sold
- Replacement land must be of equal (or greater) monetary and recreational value as land being lost
- City has identified two properties directly adjacent to Riverfront Park to serve as replacement:
  - 1.3 acres owned by Jim and Linda Simantel
  - 4.5 acres owned by Detweiller Playground, Inc.

Why are we here? (cont.)

Steps to LAWCON Conversion

1. Identify replacement property (done)
2. Obtain appraisals (done)
3. Develop Concept Plan (draft – seeking input)
4. Complete & publish application (done)
5. Public Hearing (January 20)
6. Comment window ends (January 25)
7. Submit to IDNR
River Trail Development & Replacement Properties

Red – River Trail (~ 5.8 acres)
Yellow – Replacement (~8.1 acres)

Property Acquisition

City of Peoria

Detweiller Playground

Simantel
Tonight’s Goals

Yes
- Review Concept Site Plan
- Gain additional feedback on Plan
- Answer questions

No
- Debate merits of River Trail project

How did we get here?

- Public Meetings (Nov 4 and Nov 9)
  - Widely publicized and targeted invitations to stakeholders
  - About 30-40 attendees
  - Brainstorming about park elements, prioritization
- On-line survey
  - Vote on favorite park elements
  - 67 responses
- Advisory Group Meetings (Nov 18 and Nov 23)
  - About 10 members
  - Distill public input into design concepts
What did we hear?

- Extension of Riverfront Park – passive open space
- Thin, prune and clear scrub trees to improve river views
- Fork bike/walk path and run along river
- Provide parking and access to for the Peoria Boat Club
- Preserve boat ramp
- Walking path and observation point on breakwater
- Incorporate CSO education
- Keep all significant trees; plant native species
- Improve safety through better sight lines
Thin and Clear Trees & Plant Prairie Savana

Multi-Use Space

Fork in Bike/Walk Path & Reuse of Turntable

Parking

Boat Launch

Path to Observation Point
Key Elements

- Improved sight lines and views by clearing scrub
- Extended Bike/Walk Path
  - About 1600 linear feet
  - Replaces length removed by River Trail development
- Path and observation point on breakwater
- Multi-use space of approx. 325’ x 215’ (70k sf)
- Use of boat ramp for non-motorized watercraft
- Adequate parking

<table>
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<th>Construction</th>
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<tbody>
<tr>
<td>Site Clearing / Pruning</td>
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</tr>
<tr>
<td>Path - Paved / 10’ Wide</td>
<td>$112,420</td>
</tr>
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<tr>
<td>Fill Area / General Grading</td>
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<tr>
<td>Bonds (5%)</td>
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<tr>
<td>Material Testing (4%)</td>
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<td>Contractor Gen. Conditions (12%)</td>
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<td><strong>Construction Total</strong></td>
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<table>
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<tr>
<th>Environmental</th>
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<tr>
<td>Technical Support (i.e. update RAP, testing, etc.)</td>
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</tr>
<tr>
<td>Site Remediation Oversight and Documentation</td>
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<tr>
<td>Remedial Action Completion Report</td>
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<tr>
<td><strong>Project Total</strong></td>
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</table>

Source of Funds: Northside Business Park TIF, Northside Riverfront TIF
Input and Questions

More info at [www.peoriagov.org/riverfront](http://www.peoriagov.org/riverfront)

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Public Hearing
January 20 @ 6 p.m. Council Chambers

Written Comments
Accepted through January 25 @ 5 p.m.
[riverfront@peoriagov.org](mailto:riverfront@peoriagov.org)
Appendix H

Aerial Map of Conversion and Replacement Property
Aerial Map
Riverfront Park & Replacement Site

- Yellow—Existing Riverfront Park
- Red—Proposed replacement land
- Green—City vacant property
Appendix I

Map of Riverfront Park and Festival Park
Riverfront Park and Festival Park

Note: Rocky Glen Park of 66 acres is p/o 6(f) Boundary Map but no revisions are required, and thus not included in this revision.

Source: City of Peoria, County GIS, 12/16/2015
Appendix J

Parcel Map of Replacement Property
LAWCON - Recreation Area

<table>
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<tr>
<th>Tax Payer</th>
<th>Property ID Number</th>
<th>Acres</th>
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<tbody>
<tr>
<td>Detwieller</td>
<td>1803408002</td>
<td>3.5</td>
</tr>
<tr>
<td>Detwieller</td>
<td>1803408001</td>
<td>0.3</td>
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<tr>
<td>Detwieller</td>
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<td>0.5</td>
</tr>
<tr>
<td>Simantel</td>
<td>1803451003</td>
<td>1.3</td>
</tr>
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</table>

Replacement Property (black dotted line) **5.6**

ROW - Spring Street  
535 ft x 70 ft  
**0.8**

* Boat Club House on 0.1 acre not p/o Replacement Property

Source: City of Peoria, Peoria County GIS Map 04/13/2016
Appendix K

Illustrated Site Plan of River Trail Development
Appendix L

Response to Public Comments
City of Peoria Responses to Public Comments

Introduction
The City of Peoria received 44 emailed comments, 78 postcard comments and one package of comments provided by “Friends of Riverfront Park” in response to the Revised and Compiled Environmental Assessment for Riverfront Park (EA) made available on February 3, 2017. The 2015 National Park Service NEPA Handbook outlines the process for identifying substantive comments (p. 65):

“Substantive comments are those that:
• question, with reasonable basis, the accuracy of the information in the NEPA document;
• question, with reasonable basis, the adequacy of the environmental analysis;
• present reasonable alternatives other than those presented in the NEPA document; or
• cause changes or revisions in the proposal.”

The table below shows the 10 submissions that contained substantive comments. The comments submitted by the National Park Service are not addressed in this document and are instead handled separately. Please note that the 78 postcards received were one of three separate varieties, each summarizing a set of points repeated by the Friends of Riverfront Park. Those comments are substantive but not listed below:

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<th>#</th>
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<th>Date Rec’d</th>
<th>Position</th>
</tr>
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<tbody>
<tr>
<td>1</td>
<td>Mike Buoscio</td>
<td>2/13/2017</td>
<td>Oppose</td>
</tr>
<tr>
<td>2</td>
<td>Katherine Hashimoto</td>
<td>2/14/2017</td>
<td>Oppose</td>
</tr>
<tr>
<td>3</td>
<td>David Pittman</td>
<td>2/14/2017</td>
<td>Oppose</td>
</tr>
<tr>
<td>4</td>
<td>David Pittman/Marvin Hightower (NAACP)</td>
<td>2/16/2017</td>
<td>Oppose</td>
</tr>
<tr>
<td>5</td>
<td>Jeff Griffin (Chamber of Commerce)</td>
<td>2/17/2017</td>
<td>Support</td>
</tr>
<tr>
<td>6</td>
<td>Clint Drury (West Central Building Trades)</td>
<td>2/20/2017</td>
<td>Support</td>
</tr>
<tr>
<td>7</td>
<td>Michael Freilinger (Downtown Development Corp.)</td>
<td>2/20/2017</td>
<td>Support</td>
</tr>
<tr>
<td>8</td>
<td>Lisa Offutt (Peoria Families Against Toxic Waste)</td>
<td>2/20/2017</td>
<td>Oppose</td>
</tr>
<tr>
<td>9</td>
<td>Joyce Blumenshine (HOI Sierra Club)</td>
<td>2/20/2017</td>
<td>Oppose</td>
</tr>
<tr>
<td>10</td>
<td>Karrie Alms (Friends of Riverfront Park)</td>
<td>2/20/2017</td>
<td>Oppose</td>
</tr>
</tbody>
</table>

The City’s responses are organized by section of the EA. Friends of Riverfront Park (FORP, #10) submitted a comment for nearly every section. Others may have made a comment on only one or two sections in the EA. Some comments are repeated in multiple places. The City has tried to streamline its responses by only answering multiple iterations of the same comment once. For each section, the comment is summarized and the number corresponding the sender in the chart above is placed in parentheses.

General Comments
FORP (#10) submitted a number of comments in the first few pages of their response that outline alleged improprieties with past LWCF conversions in Riverfront Park, the amount of “bank” the City is applying to this conversion, the content and form of the appraisals, and eligibility of parts of the proposed replacement property. These comments are not germane to the EA and will not be addressed in this response unless they form the basis of a substantive comment to the EA.
**Substantive Comments – Chapter 1**

1.1 Summary and Purpose
Comment: No substantive comments.
Response: Not applicable.

1.2 Background and Need
Comment: The City is violating the spirit of LWCF and its commitment to the public by pursuing this conversion. (10)
Response: The LWCF regulations clearly spell out a process that allows municipalities and other grant recipients to convert all or part of their open spaces provided they obtain the approval of the National Park Service. The City is pursuing such a conversion as allowed by law.

Comment: The City's application should be rejected because there were other alternatives for development that could pursued. (10)
Response: See 2.3 below.

**Substantive Comments – Chapter 2**

2.1 Alternative A – No Action
Comment: No substantive comments; summary of arguments made elsewhere. (10)
Response: Not applicable.

2.2 Alternative B – Proposed Alternative
Comment: The City did not provide documentation of evaluating and rejecting alternatives. (8, 10)
Response: The City submitted its “Practical Alternatives to Conversion” to IDNR in December 2015.

Comment: The City artificially describes the park as two separate parks. (10)
Response: The southern half of the LWCF park is often referred to as “Festival Park” because it is the location for many of Peoria's summer festivals such as Erin Feis, Grand Nationals and Oktoberfest. The City made this distinction within the EA in order to focus the discussion on the impact of the conversion on this section of the park.

Comment: The existing parking lot is replaced with a “new and larger” parking lot along Water Street and this parking is “overflow” parking for the apartments. (10)
Response: The existing parking lot has 46 parking spaces. The proposed parking lot along Water Street has 27 parking spaces. On the site plan, the lot is listed as “guest parking” and is intended to serve as public parking for park users.

Comment: Constitution Garden is relocated to a smaller area and there is no plan for the volleyball courts. (8, 10)
Response: Constitution Garden will remain the same size and be relocated in its entirety to a location that has greater prominence. The most common complaint of those associated with Constitution Garden is that the public is unaware of its relatively remote location within Riverfront Park. Regarding the volleyball courts, the City Council placed the obligation for creating “as good or better” volleyball courts on to the developer. No final plans have been made, but City staff have consulted the Peoria Park District and volleyball league representatives on design.
Comment: The City has not removed the “carve out” for the Peoria Boat Club. (10)
Response: While the City has received an opinion from the Illinois Attorney General that it cannot lease the clubhouse and surrounding ground to a private party, there is no requirement that it revise the 6(f) map. At this time, the City wishes to withhold the clubhouse area from the conversion.

2.3 Other Alternatives Considered But Not Selected
Comment: The City never considered alternative sites. Taft Homes should have been explored. (3, 9, 10)
Response: False. No viable alternative sites were available as documented in the City’s Practical Alternatives to Conversion document. In a February 24, 2016 response to IDNR regarding Taft Homes as an alternative, the City provided the following response (edited for length):

While the redevelopment of the Taft property is a widely held community goal, it is a goal complicated by strict federal rules, particular financial constraints and strong citizen opposition... An article in the February 2014 Peoria InterBusiness Issues summarizes the recent history of these efforts [to redevelop the Taft site]:

“Initial conceptual master planning for the site began in 2009 with the assistance of Farnsworth Group. At the time, phased redevelopment on the existing site was planned, with input from the PHA Board of Commissioners and Taft residents. Redevelopment efforts at that time were focused at Harrison Homes, with the award of American Recovery and Reinvestment Act funds from the Department of Housing and Urban Development (HUD). However, PHA would revisit master planning for Taft Homes through the solicitation of a planning consultant to include a formalized community needs assessment.

“In early 2011, Taft redevelopment planning began with the assistance of Brinshore-Michaels Development. The community needs assessment was conducted through a collaborative partnership between the Center for Urban Research and Learning at Loyola University, Bradley University’s Department of Social Work and the Peoria Opportunities Foundation. The needs assessment and community feedback were used to create an option for affordable housing development on-site.

“In 2013, PHA worked with Taft residents and other stakeholders to research alternative redevelopment strategies, including the relocation of the units altogether or in part to areas of opportunity within the city. Through the generous assistance of the City of Peoria, Training Development & Associates (TDA) Consulting was secured to oversee this process and produce strategies for full-site replacement, with the option of leveraging the value of the current Taft Homes. Upon conclusion of these initiatives, the Board of Commissioners authorized PHA administration to proceed with a Rental Assistance Demonstration (RAD) application to HUD and the solicitation of a co-developer.”

In 2014, PHA tried to take the first step towards developing alternative housing to relocate Taft residents. PHA and its development partner attempted to purchase the Greeley site from School District 150 to create 45 units of affordable housing. That plan was met with considerable
neighborhood opposition and a request for rezoning was strongly debated by the City Council before being withdrawn by PHA. PHA has also met stiff neighborhood resistance when it attempted to identify housing locations in other parts of Peoria ... At no time over the past 8 years has PHA had a comprehensive solution for the relocation of existing units that would have made the Taft site a viable alternative for the River Trail project.

Substantive Comments – Chapter 3
This chapter of the EA is intended to describe the environment in its current state. FORP (10) makes numerous comments regarding this section that concern the impact of the conversion on the environment. Those comments should be located, and are generally repeated, in Chapter 4 “Environmental Impacts.” The City is not responding to any comments relative to impact made in this section but will address any comments made regarding current condition.

3.1 Geological Resources
Comment: No substantive comments.
Response: Not applicable.

3.2 Air Quality
Comment: No substantive comments.
Response: Not applicable.

3.3 Noise
Comment: No substantive comments.
Response: Not applicable.

3.4 Water Quality/Quantity
Comment: No substantive comments.
Response: Not applicable.

3.5 Natural Resources (Wetlands, Floodplain, Species/Habitat)
Comment: The City’s chart of floods should extend further back than 2000. (10)
Response: The origin of the City’s analysis came from a question raised by IDNR after the initial submission of the EA in January 2016. IDNR asked for the flood history for the past 10 years (2006-2015). The City provided data from 2000 in response.

Comment: The information provided by the City is misleading and does not reflect the duration of a flooding event. (10)
Response: The chart listed flood events by the date of the crest, but did not imply that such events were limited to one day. The purpose of the chart was to demonstrate that on only ten occasions over 16 years would an event have caused parts of the new park to flood. Furthermore, only five of those floods would have impacted more than the breakwater.

Comment: The City did not include a flood event on 1/25/17. (10)
Response: The chart that was included was prepared in February 2016 in response to an IDNR inquiry and hence before the January 26, 2017 flood mentioned by FORP. However, the 18.09’ crest of January 2017 (as shown on page 19 of FORP’s document) would have no impact on the replacement property.
3.6 Land Use and Planning
Comment: No substantive comments.
Response: Not applicable.

3.7 Circulation, Transportation, and Accessibility
Comment: No substantive comments.
Response: Not applicable.

3.8 Recreation
Comment: No substantive comments.
Response: Not applicable.

3.9 Aesthetics
Comment: No substantive comments.
Response: Not applicable.

3.10 Historical and Cultural Resources
Comment: The conversion property may have archaeological resources connected with early settlers and Native Americans. (10)
Response: The comment provides no evidence of any cultural or historic resources on the conversion or replacement site and instead relies on a general assumption given proximity to the Illinois River. At the direction of IDNR, the City hired a certified archaeologist to conduct a Cultural Resources Survey of all areas. The conclusion was that no resources were likely to exist. At further direction of IDNR, the City, through its archaeologist, hired a geomorphologist to conduct soil borings at various spots throughout the properties. This analysis also yielded an opinion of no resources present. These studies were validated by the IDNR archaeologist as well as the Illinois Historic Preservation Agency.

3.11 Socioeconomic Resources and Economic Justice
Comment: Information about Tri-County Regional Planning Commission’s analysis of Areas of Opportunity is mentioned. (10)
Response: The City would agree with this analysis and finds it consistent with its own description in Section 3.11.

Comment: Racial data from the American Community Survey appears to be miscalculated. (10)
Response: The City should have instead used data from the 2000 Census, which is more accurate regarding population statistics. Below is the racial data for Tracts 12 and 13:

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<th>Census Tract 12</th>
<th>Census Tract 13</th>
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<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
</tr>
<tr>
<td>One Race</td>
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<tr>
<td>White</td>
<td>596</td>
<td>33.9%</td>
<td>985</td>
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<tr>
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</tr>
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</tr>
<tr>
<td>Asian</td>
<td>29</td>
<td>1.6%</td>
<td>5</td>
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<tr>
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<td>Total</td>
<td>1,759</td>
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<td>2,330</td>
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</table>
3.12 Mandatory Criteria
Comment: No substantive comments.
Response: Not applicable.

Substantive Comments – Chapter 4
4.1 Geological Resources
Comment: The EA minimizes the importance of geological resources connected with Native Americans in the conversion property and should not be “swapped for a contaminated dangerous land fill site.” (1, 9)
Response: Section 3.10 of the EA documents that a Cultural Resources Survey and accompanying geomorphological analysis determined that there was no evidence of soils upon which such civilizations were likely to live. The conversion site is largely comprised of fill. As documented in 3.1, the conversion site itself is contaminated due to its past industrial use. Only a portion of the replacement property is contaminated.

Comment: The commenter questions the quality of fill used to develop Riverfront Park as an LWCF property. (10)
Response: The soil contamination is the result of past industrial use of this property and not City activity creating the park.

Comment: The City should remediate any environmental issues in its 1.6 acre parcel that is planned for the park extension but not included in the 6(f) boundary. (10)
Response: In creating the new park, the City will abide by all rules and regulations to develop a useable recreational area. The City has sufficient funds available for remediation activities in the new park.

4.2 Air Quality
Comment: The presence of Solazyme and PMP Fermentation contribute to air pollution and pose a risk to future residents. (8, 9)
Response: The EA is limited to discussion of the impact of the conversion on the remainder of the park. The facilities noted exist now and will continue to exist with or without this conversion. As outlined in Section 3.2 of the EA, there are no documented cases of Clean Air Act violations by either facility in the last 5 years.

Comment: The introduction of vehicle traffic will negatively impact park users. (8, 9, 10)
Response: No evidence is offered that emissions from vehicles would exceed the minor impact noted in the EA.

4.3 Noise
Comment: The introduction of vehicle traffic will negatively impact park users. (9, 10)
Response: No evidence is offered that vehicle noise would exceed the minor impact noted in the EA. The presence of two adjacent industrial facilities and an adjacent railroad already impacts the park during operational hours.

4.4 Water Quality/Quantity
Comment: The current contamination of the Illinois River and the Combined Sewer Overflow (CSO) pipe located at the end of Spring Street are contamination risks for the replacement property. (3, 4, 9)
Response: The comment provides no evidence to counter the statement made in Section 3.4 of the EA that the CSO poses any threat to humans on land. The City currently posts notice about contact with the water during overflow events and is actively working to remediate the larger CSO issue.

Comment: Run-off of contaminated soils during construction may impact the Illinois River. (9)
Response: The approved Remedial Action Plan outlines steps to be taken to contain soils on site and to prevent any such contamination.

4.5 Natural Resources (Wetlands, Floodplain, Species/Habitat)
Comment: The conversion will impact 1 acre of mature prairie. (8, 9, 10)
Response: IDNR has certified that no habitats for threatened species is impacted by this request.

Comment: The proposed replacement property floods often and will limit the City’s ability to construct the new park. (3, 4, 8, 9, 10)
Response: The majority of the proposed park is outside of the floodway, the classification of property that would limit construction or grading. The remainder is either in the floodplain or outside of the floodplain altogether. The City itself is the permitting agency for any improvements in the floodplain. No new structures are planned in the park and any grading and shaping of the property will be subject to applicable regulations and laws.

Comment: The City did not properly evaluate options for replacement property other than these two within the floodplain. (10)
Response: There is no requirement that the City evaluate other options for replacement property. While the City did investigate other opportunities along the Illinois River (both within and outside the floodplain), its search was limited to riverfront property so that the replacement would be provide similar access as the property being converted.

4.6 Land Use and Planning
Comment: No substantive comments.
Response: Not applicable.

4.7 Circulation, Transportation, and Accessibility
Comment: The loss of the existing parking lot off of Morton Street will hinder visitors to the memorials in the park. (9)
Response: The proposed 27-stall public lot along an extended Water Street is nearly the same distance, if not closer, to the memorials than the current parking lot.

Comment: The City does not analyze the impact of the Water Street extension on the RiverPlex. (10)
Response: While the RiverPlex property is outside of the 6(f) boundary and not required to be considered by the EA, the Site Traffic Analysis was conducted in part to determine the impact of the road extension on that facility. The analysis showed no negative impact.

4.8 Recreation
Comment: The extension of the roadway will have a negative impact on the recreational utility of the remainder of the park. No scale drawing of the road is included to judge this impact. (2, 8)
Response: Water Street is extended along the edge of Riverfront Park through an area that is largely planted as prairie and not used for recreation purposes. An illustrated site plan of proposed development, inclusive of the roadway extension, is included below.

Comment: The conversion will remove the “largest open space within 1 mile of downtown” and is replaced by a smaller open space in the replacement area. (3, 4)

Response: The conversion impacts about 2.3 acres of useable open space in Riverfront Park. The Concept Site Plan shows an open multi-use field of approximately 3.5 acres.
Comment: The City has no plan for relocating the volleyball courts nor a way to pay for its relocation. (8, 10)

Response: While a final design has not been developed, the City does intend the relocate the sand volleyball courts to a section of Festival Park adjacent to the RiverPlex. It has consulted with the Peoria Park District but notes that all the land in question is owned by the City and only managed by the District. The cost of relocation is borne by the development. The approval of the multi-family plan is conditioned upon the developer including the relocation of the courts in “as good or better condition” in its budget. The developer is committed to this concept but will not finalize designs or cost until the entire project is approved.

Comment: The allowance of the Peoria Boat Club’s docks to remain constitutes a private marina which is in opposition to LWCF rules. (10)

Response: The City will not be operating a private marina. Rather, the Peoria Boat Club will be allowed to anchor their docks to the shore in a section of the property withheld from the 6(f) boundary. Access to the docks themselves be limited at the Club’s discretion. The City will continue to withhold the “carve out” from the boundary map regardless of whether it leases the clubhouse and grounds to the Club.

Comment: The City omits the clubhouse from its Concept Site Plan. (8, 9, 10)

Response: The City included an earlier and incorrect version of the Concept Site Plan in its EA. The correct version, which had been submitted to IDNR in April 2016, is included below.

4.9 Aesthetics

Comment: The EA minimizes the impact of the proposed apartment development on the aesthetics of the park and fails to state any aesthetic criteria for the development. (2)
Response: By direction, the EA was to focus on the loss of open space property and not the resulting development. However, an illustrated site plan for the development is included in Section 4.8 above. In the opinion of the City, the development is complementary of the surrounding park.

Comment: The residential development will ruin the aesthetics of the park. (9, 10)
Response: This is an opinion that is not supported with any evidence.

4.10 Historical and Cultural Resources
Comment: No substantive comments.
Response: Not applicable.

4.11 Socioeconomic Resources and Minority and Economic Justice
Comment: The loss of the converted property has a negative impact on the socioeconomically disadvantaged community that surrounds the park. (3, 4, 9, 10)
Response: The loss of one section of the park is offset by a nearly equal addition of parkland proposed in the replacement plan. Further, the extension of the park replaces or improves upon any of the recreational utility lost in the conversion and adds greater public access to the Illinois River. Even if evidence were provided to support the concept that low-income residents utilize the conversion portion of Riverfront Park, there are no stated impediments to those same individuals utilizing the adjacent replacement land in the same way. Additionally, as mentioned in a different public comment (6), Peoria is experiencing high unemployment, with particularly high unemployment in the construction trades. The conversion allows a multi-million dollar project to proceed which will create jobs and bring new investment to a struggling section of the community.

Comment: The proposed 6(f) boundary map carves out a section of the Detweiller Playground Inc. property even though the City has been advised by the Illinois Attorney General that it cannot lease that land (and clubhouse) to the Peoria Boat Club. (10)
Response: While the City may be prohibited from leasing property to the Peoria Boat Club, it is not consequently required to include the property in the 6(f) map. The City wishes to withhold this property from the official conversion.

4.12 Mandatory Criteria
Comment: The City’s response to Criteria 1 in the table is incorrect: The extension of Water Street will impact the health and safety of park users. (10)
Response: As noted in Section 4.7 of the EA, a Site Traffic Analysis indicated no negative impact of the road extension.

Comment: The City’s response to Criteria 10 in the table is incorrect: The conversion will have a disproportionately high and negative impact on low income communities. (10)
Response: As outlined in the response offered in 4.11 above, this comment is not based on any evidence apart from a theory that low-income neighbors of Riverfront Park will not be able to use the replacement park that is directly adjacent to the current one.
**Substantive Comments – Chapter 5**

5.1 Public Availability of Draft EA

Comment: The City should have made the EA available for public comment for 30 days.
Response: The 15 day public comment period was deemed acceptable by IDNR and NPS.

5.2 Previous Opportunities for Public Comment

Comment: No substantive comments.
Response: Not applicable.

5.3 References Consulted

Comment: No comments.
Response: Not applicable.

5.4 List of Preparers

Comment: No comments.
Response: Not applicable.

"Miscellaneous Comments"

FORP (10) adds a number of “miscellaneous comments” at the end of its response document. Those germane to the EA are addressed below.

Comment (6.2): Figure 2 does not show the extension of Water Street in the conversion site. (10)
Response: Figure 2 was intended to be used as a locational device within the narrative so that readers would know the general area of the conversion and replacement properties. This can be revised if problematic.

Comment (6.2): The City includes property within Figure 2 that are not included in proposed 6(f) map. (10)
Response: Figure 2 was intended to be used as a locational device within the narrative so that readers would know the general area of the conversion and replacement properties. This can be revised if problematic.

Comment (6.3) The current 6(f) boundary map does not include the 66 acre Rocky Glen Park that is associated with a prior conversion of Riverfront Park. (10)
Response: The City was advised by IDNR to exclude Rocky Glen from the boundary map since the City is no longer the sponsor of that project or property. This can be included if necessary.

Comment (6.4): The proposed 6(f) map should show the extension of Morton Street as part of the conversion. (10)
Response: The City did not account for the extension of Morton Street in its application for conversion. The existing segment of Morton Street is not within the current 6(f) boundary, but the project extends this public roadway in order to provide access to the proposed residential development. The expansion of the roadway takes an additional 6,825 square feet (0.16 acres) of the park. In addition, a small landscaped area of 3,990 square feet (0.09 acres) between the extended Morton Street and new private property line, while publicly owned, should also be included in the conversion.

To correct this error and to offset this addition of 10,815 total square feet (0.25 acres) to the conversion, the City will reduce the size of the property being sold for development.
by an equal amount. Nearly 1.3 acres of the proposed development is a grassy area of private property that exists between the extensions of Water and Morton streets. The developer has agreed to shrink the size of that portion of the plan in order to keep the acreage of the conversion request the same.

Comment (6.4): The proposed 6(f) map should account for the portion of park between the extended Water Street and the railroad tracks. (10)
Response: There is approximately 0.8± acres of land between the proposed extension of Water Street and the boundary of the park formed by the railroad tracks. This property will remain a part of the park and in public ownership. Furthermore, the City believes that the area retains its recreational value. Currently, this area is largely a prairie area that is not readily accessible for recreation. The picture below shows the current (March 2017) condition of the area. Though the road will go through this area (and is accounted for in the conversion), the park on either side will still be useable and well landscaped.

Comment (6.4): The City should include its own property and right-of-way within the 6(f) map.
Response: The City commits to developing its own property and right-of-way as part of the proposed park extension but does not wish to include the property in the 6(f) boundary unless it can count the monetary value of that land in the conversion.

Comment (6.4): The City should not be allowed to withhold 6,000 square feet from the proposed boundary because the Illinois Attorney General will not allow the City to lease the property to the Peoria Boat Club. (10)
Response: While the Illinois Attorney General has advised the City that this property cannot be leased to the Peoria Boat Club, that ruling has no impact on the City’s ability to withhold or include any property for purposes of LWCF conversion.

Comment (6.7): The City did not describe the elements and impact of the “mandatory criteria” in Section 4.12. (10)

Support: The NPS provided the City with a sample EA from the Blunt Park conversion in Springfield, MA that did not show detail of this section. The Mandatory Criteria table is a set of questions to which the City’s answer to each is no.
Appendix M

Response to NPS Comments
City of Peoria Responses to National Park Service Comments

Through the public comment period on the *Revised and Compiled Environmental Assessment for Riverfront Park* (EA), the National Park Service (NPS) submitted feedback on the City’s analysis. Those comments, concerns and/or questions are shown below in bold. The City has addressed each NPS point. For many of the points, indicated by an italicized statement, in addition to responding within this document the City also revised the EA. Other comments are only addressed in this response document.

**A. Acres for converted and replacement could be clearer throughout the document**

*This section (1.1) of the Environmental Assessment has been revised to reflect this information.*

If the final revision, the City clarified acreages. In the February 2017 draft EA, the City outlined its conversion request of 6.4± acres within the current LWCF boundary: 5.8± acres to account for a private residential development and 0.6± acres to account for a public roadway. However, the City failed to account for 10,815 total square feet (0.3± acres) that will also be removed from open space due to the short extension of Morton Street (6,825 square feet for road pavement plus 3,990 square feet for an isolated landscape area.) This property should be converted. To address this, the City and developer will shrink the private development parcel by an equal amount. The City’s conversion request remains 6.4± acres, but the mix changes slightly: 5.5± acres for private development and 0.9± acres for public roadway.

As compensation, the City is proposing to add 5.6± acres of private property to the LWCF boundary: 1.3± acres of property owned by Jim and Linda Simantel and 4.3± acres of property owned by Detweiller Playground, Inc.

The following table summarizes the City’s conversion calculation.

<table>
<thead>
<tr>
<th>Conversion acreage calculation for Riverfront/Festival Park</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><em>(not including Rocky Glen Park—66 acres)</em></td>
<td></td>
</tr>
<tr>
<td>Original LWCF Project</td>
<td>38.4± acres</td>
</tr>
<tr>
<td>1999 Conversion (RiverPlex)</td>
<td>1.8± acres</td>
</tr>
<tr>
<td>Current LWCF Project (before this conversion)</td>
<td>36.6± acres</td>
</tr>
<tr>
<td>Acreage Lost to This Request</td>
<td>6.4± acres</td>
</tr>
<tr>
<td>Acreage Added from This Request</td>
<td>5.6± acres</td>
</tr>
<tr>
<td><strong>New LWCF Project Acreage</strong></td>
<td><strong>35.8± acres</strong></td>
</tr>
</tbody>
</table>

**B. City could further discuss why the "unused area" at Riverfront Park was most suited for non-recreation development.**

The City never uses the word “unused” within the EA. Rather, the area for which the City is seeking conversion is described as the “less utilized portion” and “underutilized” (relative to other parts of the park). In seeking to create a development opportunity for new housing in downtown Peoria, Riverfront Park was viewed as the most viable location. The park is over 30 acres in size and runs along the Illinois River from I-74 to Spring Street. The areas of the park closest to the river are the most popular and well used. The bike/walk path that extends the length of the park is consistently busy during fair weather by walkers, runners and cyclists. Between Morgan and Morton Streets, the
park widens considerably. While the riverfront path is still well used in this section, the upper half of the park – the center of the proposed conversion – has less recreational amenities and is consequently less used. Developing elsewhere in the park seemed unwise given its use as well as constrictions that would have been placed on construction from the floodplain. Furthermore, environmental investigations conducted in 2010 found subsurface contamination in the conversion area. Without costly remediation, additional recreational development would have been considerably difficult.

C. Maps: Please include maps from the prior Conversion Proposal and addendums that were excluded from this revised and compiled Draft EA. Some of the maps better explain things. (eg EA by ELM, Map could show Festival Park area, separate from rest of Riverfront park)

Additional appendices have been added to the Environmental Assessment.

This comment was based on an earlier draft of the EA (January 2017) that did not include any appendices (though appendices were referenced in the document). The publicized version of the EA (February 2017) included photographs of existing conditions and a zoning map of the parcels. The following maps (which are attached to this response document) have been added to the EA:

1. Topographic maps of both the conversion site and replacement site
2. Map of recreational elements in Riverfront Park
3. Aerial map of Riverfront Park and proposed replacement property
4. Map of Riverfront Park and Festival Park
5. Parcel map of replacement property
6. Illustrated site plan of River Trail apartment project

D. Topographic Map: Could use topographic map to show closeup of converted site and replacement site

This appendix was added to the Environmental Assessment.

See Item C above. Also, Figure 8 in Section 3.5 shows topographical lines for the replacement property.

E. EA alternatives emphasize benefits for city development rather than benefit for park improvement. Alternative should discuss all areas that the city rejected and accepted. Though the rejected was briefly discussed the accepted alternative was discussed a little more.

Section 2.3 outlines how the alternatives available for development along the Illinois River were either not viable or were particularly limited. Large tracts of property along the river were owned by industrial or commercial entities that were utilizing their land for internal operations. These properties, for one reason or another, were not available for this project and hence rejected as alternatives. Briefly, those alternatives were (the following correspond to Figures 6 and 7):

- Archer Daniel Midland – completely utilized as an industrial operation
- Ameren Cilco – completely utilized by business
- US Postal Service – completely utilized by business
• Peoria Housing Authority (Taft Homes) – some potential for development, but the Housing Authority cannot sell or develop its property without finding housing alternatives for existing tenants
• PMP Fermentation – completely utilized by industrial operation
• Solzyme – completely utilized by industrial operation
• Edward Hine Printing – at time of project start, completely utilized by business
• O’Brien Steel – completely utilized by industrial operation
• Detweiller Marina – mostly in the floodplain, unavailable for private development
• Komatsu – completely utilized by industrial operation

The most viable and available property was the 1.3 acre Simantel property, but was rejected as an alternative due to small size and soil instability.

Within the LWCF property itself, the current location of the conversion request was the only viable option. Sections of the park directly along the Illinois River are within the floodplain and pose limitations to construction. It is also relatively narrow through most of the park; any development within these areas would have had a negative impact on the remaining park. The City sought to limit development to the wider and arguably less utilized section of Riverfront Park. Originally, the site plan for development would have had a much greater impact on the park. The development site itself was nearly 7.5 acres, not including any new roadway. In working with the City Council and staff, the developer condensed the project into the present 5.8 acres and moved it as far from the river as possible.

Other than the Simantel property, none of the above properties were suitable for park development either for the same reasons. (Note: Detweiller Marina, apart from the section leased to the Peoria Boat Club, was already developed as a publicly managed park.) In searching for replacement property, the City was focused on additional riverfront property so as to build on an existing asset. In addition to the Simantel and Detweiller Playground properties, the City investigated a number of other properties along the river, most notably a section of land owned by Komatsu along Grant Street (adjacent to Woodruff Park) and private property near IL Route 6. The Komatsu property was limited in its recreational utility. The IL Route 6 property was considered too remote a location to properly serve existing park users. In evaluating options, the two selected properties were chosen because of their adjacency to the existing Riverfront Park and the ability to extend the amenities of that park into this area. The selected parcels also complete a 1.3 mile stretch of publicly managed park.

F. Of the 31 times of flooding in Peoria, how often has the proposed replacement area or park itself flooded? Is the 18 feet water level by the marina not considered flooding? [p18]

The City has not calculated how many times the current LWCF park has flooded, but the conversion site within that park is outside of the floodplain and has never flooded. Section 4.5.2 (page 25-26 of the February 2017 EA) outlines the impact of flooding on the proposed replacement land. Of the 31 recorded floods of the Illinois River since 2000 only 19 would have impacted this property. This is because none of the replacement property is flooded below a 20’ river crest (flood stage of the Illinois River at Peoria is 18’). Section 4.5.2 continues to describe how the proposed replacement park is affected by flooding. None of the recreational amenities or useable portions of the replacement park would have been impacted by nine of the floods. Since 2000, the proposed path along the breakwater would have been flooded and unusable ten (10) times. Within those occurrences, other portions of
the park beyond the breakwater would have experienced flooding five (5) times. Please see Figure 8 (page 19) and Table 1 (page 20) to determine how various floods impact the park.

G. The city should show why the replacement is a better alternative than what currently exist. They have to show why the gain outweighs the loss for its citizens.

The guidance provided by NPS in crafting the EA suggested that the document should be a statement of facts rather than an argument in favor of the City’s position. The City firmly believes the replacement property is superior than the property lost to conversion. Riverfront Park’s unique feature is its adjacency to the Illinois River. The replacement property extends that adjacency, adding nearly 1,200 linear feet of access to the river. The replacement property also links Riverfront Park to Detweiller Marina. While the nearly 24 acre property is privately owned by Detweiller Playground, Inc. it is managed by the Peoria Park District and open to and used by the public. Converting the replacement property to a park places 1.3 miles of Illinois River property (from I-74 to Hayward Street) under public management.

In addition to greater public access to the Illinois River, the recreational amenities planned for the replacement property are superior to those lost in the conversion. As noted, the sand volleyball courts and Constitution Garden are relocated within the park in as good or better condition. The 1,250 feet of the upper loop of the bike/walk path removed in the conversion are replaced by approximately 1,600 feet of new path in the replacement property. The Concept Site Plan also indicates an open field of about 3.5 acres, greater in size than the 2.3 acres field lost in the conversion. Finally, the planned breakwater path and observation point provide a unique opportunity to enjoy the Illinois River.

H. Figure 4 page 10 - In the text (top of page 8) 1.6 acres of public land is mentioned as coming into LWCF surrounding the Simantel parcel but this map does not reflect that. The boundary excludes that piece of land. Please also suggest removing the light pink and yellow shading on this map it makes it confusing when trying to locate the yellow for the marina exclusion

While the 1.6± acre parcel of City-owned land (as well as 0.9± acres of right-of-way) are planned to be incorporated into the extension of Riverfront Park, they are not included within the new LCWF boundary. The City was provided direction by IDNR that the LWCF boundary should only include the property that is being included in the conversion-replacement calculation. While the City’s property is unfortunately not allowed to be included for calculation purposes, it does plan to make them part of the larger park.

Regarding the shading on the map, the City was using a GIS base map to create the boundary map. That shading cannot be removed from the base map, but the City can work to make the boundary map clearer.

I. Figure 5 page 12 - this does not show the existing clubhouse that will be excluded from the site for the Peoria boat club. Is the marina for exclusive use as well? Where is the public small boat launch for non-motorized boats. Please label that on the map. (The text suggests this is separate from the boat launch with the ramp.

_this section of the Environmental Assessment has been revised to reflect this information._
The City included an outdated version of the Concept Site Plan in the EA. An updated version, which was submitted to IDNR in April 2016 to match the City’s request to withhold some property from the boundary, is attached to this response document and can be incorporated into any final EA revision. On both versions of the Concept Site Plan, the small boat launch is indicated and labelled “existing boat launch” near the proposed parking lot. The dock slips within the marina are the private property of the Peoria Boat Club and their use will be restricted to their membership or as the Club dictates. The marina itself is open to the public.

J. 3.6 page 20 - Currently all of the Detweiller parcel is fenced and leased to the boat club or is it only the clubhouse portion? Please clarify.

This section of the Environmental Assessment has been revised to reflect this information.

Approximately 2.4 acres of the Detweiller property is currently fenced, though all of it is considered private property and leased to the Peoria Boat Club. The current clubhouse is within the fenced area but is not separately fenced. The image below shows the current fence as a red line:

K. 3.8 - page 21 - In order to discuss the impacts in Section 4.8 the items impacted should be referenced/discussed in this section. For example the turntable and maintenance building. Please also include how people use the park to recreate now.

This section of the Environmental Assessment has been revised to reflect this information.

The City should have added the following items to the list of amenities in Section 3.8:

1. A 5,772 square foot maintenance building utilized by the Peoria Park District.
2. A railroad turntable that remains from the original railroad operations that existed prior to the park’s development.
L. 3.10 page 22 - Please make mention of the historic railroad turntable in this section as it is mentioned in Section 4.10

This section of the Environmental Assessment has been revised to reflect this information.

The City should have added the following sentence at the end of Section 3.10: Though the Survey determined, and the Illinois Historic Preservation Agency concurred, that there were no structures eligible for inclusion on the National Register of Historic Places, the conversion property does include a century-old railroad turntable.

M. 3.11 page 22 - Please mention why the American Community Survey data was used instead of the census data?

This section of the Environmental Assessment has been revised to reflect this information.

The American Community Survey (2015) was used as it is potentially a more current view of the population characteristics of these two census tracts. For population counts, however, the US Census is preferable and should have been used. Below is an analysis of the racial composition of Census Tracts 12 and 13 based on the 2000 Census.

<table>
<thead>
<tr>
<th></th>
<th>Census Tract 12</th>
<th></th>
<th>Census Tract 13</th>
<th></th>
<th>Combined</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
</tr>
<tr>
<td>One Race</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White</td>
<td>596</td>
<td>33.9%</td>
<td>985</td>
<td>42.3%</td>
<td>1,581</td>
</tr>
<tr>
<td>Black</td>
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<td>54.6%</td>
<td>1,052</td>
<td>45.2%</td>
<td>2,012</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
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<td>0.2%</td>
<td>17</td>
<td>0.7%</td>
<td>20</td>
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<tr>
<td>Asian</td>
<td>29</td>
<td>1.6%</td>
<td>5</td>
<td>0.2%</td>
<td>34</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>121</td>
<td>6.9%</td>
<td>187</td>
<td>8.0%</td>
<td>308</td>
</tr>
<tr>
<td>Two Races</td>
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<td>2.8%</td>
<td>84</td>
<td>3.6%</td>
<td>134</td>
</tr>
<tr>
<td>Total</td>
<td>1,759</td>
<td></td>
<td>2,330</td>
<td></td>
<td>4,089</td>
</tr>
</tbody>
</table>

N. 4.1.2 page 24 - Please bolster the discussion made under the replacement site. This area has significantly less construction, so please specify what barriers will prevent contact with contamination. Will the geotextile covered with 18 inches of clean fill occur along this segment?

This section of the Environmental Assessment has been revised to reflect this information.

As noted in Section 4.1.2, similar methods for environmental remediation will occur at the replacement site as are being used at the conversion site. The City will rely upon engineered barriers and institutional controls proposed in an approved Remedial Action Plan (RAP) to render all potential COC exposure pathways for onsite locations incomplete. Remedial actions will be completed in conjunction with Site development to satisfy SRP requirements. Since the replacement property does not include any new structures, only two types of engineered barriers may be constructed to meet the requirements of 35 IAC 742.1105: asphaltic concrete pavement (i.e. parking lot, bike/walk paths) and/or synthetic geotextiles covered with a minimum of 18 inches of uncontaminated fill soil or rip rap.
O. 4.5.2 page 25 - While there will be no new structures there will be a new viewing platform and trails in this area. Please mention those will be built to withstand periodic inundation from flood events. Also during flooding, this section of park will be closed or posted to broadcast those conditions to the public.

This section of the Environmental Assessment has been revised to reflect this information.

The replacement park will be designed and constructed in consideration of periodic flooding. Any improvements, such as a viewing platform, will be built to withstand floods. Similarly, any plants will be selected for tolerance to flooding. Portions of the park that become inaccessible due to a flood will be closed to the public.

P. 4.7.2 page 26 - How far away is that new parking lot on the Water Street Extension from the current parking location? Will there be accessible options closer or are those not necessary. If not, please provide an explanation of why. Will no park visitor parking be permitted in the river trail apartments? That should be mentioned.

This section of the Environmental Assessment has been revised to reflect this information.

The new parking lot along Water Street is approximately 500 feet southwest of the current parking lot. This parking lot is just as close to particular recreational features of the park (i.e. the Alzheimer memorial and bike/walk path) as the existing parking lot. In addition, the Concept Site Plan includes a parking lot so that northeast end of the park is more accessible. While the parking lot within the River Trail Apartments is private property, the area is not gated or otherwise restricted.

Q. 4.8.2 page 27 - Please mention the length of time necessary to develop the replacement property (it seems to be 2 years. Please mention the removal of fence from the Detweiller property but the re-installation around the clubhouse for the boat club. Finally, please clearly articulate how the replacement property provides equivalent utility for what was lost. Remember displaced utility relocated within the remainder of the park (gardens and 10 volleyball courts) does not satisfy this requirement. This would be a good place to add comments from Addendum #3 concerning future uses.

This section of the Environmental Assessment has been revised to reflect this information.

Depending on the timeframe for final NPS approval within the Midwest build season, the City anticipates completion of the replacement park in two years. Immediately upon said approval, the City will close on the purchase of the replacement properties. In the first year, the following activities will take place:

- Finalize park design
- Remove fencing from Boat Club property (northeast of Spring Street)
- Clear, thin and prune trees on all properties and breakwater
- Conduct environmental remediation activities
- Grade/fill the Simantel and City properties (southeast of Spring Street)
- Vacate Spring Street and remove pavement
• Begin grass, savanna and other planting
In the second year, the following activities will take place:
• Extend bike/walk path
• Construct trail on breakwater
• Construct parking areas

The northeast section of the new park would be open within four months of approval. The southwest section would be open as soon as environmental remediation activities are completed, but anticipated within the first year. Sections of the park might need to be closed for construction activities like path construction. The park hours will match those of the adjacent Riverfront Park: year round from sunrise to sunset.

As noted above, the fencing around the current Peoria Boat Club property would be removed immediately. There are no immediate plans to fence the clubhouse and surrounding property that is not included within the LWCF boundary. While the City carved this section of the property out of the official conversion, it did so to preserve the option of continuing a lease with the Peoria Boat Club. However, the Illinois Attorney General has opined that the City may not lease any of this property to a private entity. While the docks are not the subject of this opinion and may remain, the City will not lease any land to the Club. Though the clubhouse will not be leased to a private party, the City will retain the structure on the property to serve as an office for park employees (replacing the maintenance facility in the conversion area).

Regarding recreational utility of the replacement property, please see the answer in Item G above. All of the items mentioned in #8 of Addendum 3 were already included in Section 4.8.2, but are added here as well:

• The existing bike/walk path will be forked near the southwest edge of the replacement site and extended along the Illinois River in a loop that rejoins the main path at the northeast end of the site. In total, approximately 1600 linear feet of bike/walk path is added.
• An unpaved path, approximately 500 feet in length, will branch from the bike/walk path to provide access to the breakwater peninsula. A simple observation area will be created along the breakwater.
• An open multi-use space (approximately 3.5 acres) will allow for picnicking, informal games and organized sports.
• Improved access to the river will increase interaction with the water and create opportunities for fishing and bird watching.
• The preserved boat launch near the northeast edge of the site will provide an opportunity for non-motorized water craft such as kayaks and canoes to enter the marina.
• The preserved mature trees near the marina allow for shaded picnicking.

R. The revised EA is lacks enough emphasis on replaced recreation utility.

This section (4.8.2) of the Environmental Assessment has been revised to reflect this information.
Building on the answers to Items G and Q above, there will be a net gain in recreational utility if the conversion is approved and the replacement plan is implemented. Four main recreational elements are impacted by the conversion:

**Open Field**
The conversion area will impact approximately 2.3 acres of contiguous open space in Riverfront Park that is occasionally used for picnicking, informal recreation and at least one organized sports use (a picture of youth soccer practice in this area was submitted as public comment by Peoria Families Against Toxic Waste). The replacement plan, however, creates an open field of approximately 3.5 acres that replaces and exceeds this lost recreational utility.

**Bike/Walk Path**
Approximately 1,250 linear feet of the upper half of the bike/walk loop will be removed. This section of the path is used by cyclists and pedestrians, both as a part of the longer trail and to access the public parking lot off of Morton Street. This lost recreational utility is replaced and exceeded by the creation of approximately 1,600 linear feet of bike/walk path in the park extension (replacement property). Additionally, the replacement plan adds about 500 feet of unpaved path along the breakwater.

**Constitution Garden**
As part of the redevelopment plan, Constitution Garden will be relocated in its entirety to a new location within Riverfront Park. Constitution Garden was built as a memorial to the signing of the US Constitution. In addition to viewing by general visitors to Riverfront Park, a formal ceremony is held at Constitution Garden every Flag Day. In total, the Garden occupies approximately 3,900 square feet. The image below shows Constitution Garden’s current location (red circle) and proposed new location (green circle). The new location has advantages over the current one, chief among them increased visibility to park users. The location to which it will be moved has no current recreational utility. It is narrow section of land between the bike/walk path and Illinois River. The image below shows the current condition of the proposed new location.
Volleyball Courts
Similar to Constitution Garden, the 10-court sand volleyball complex will be relocated to another section of Riverfront Park. The image below shows the general before (red) and after (green) locations:

A design for the new volleyball courts has not yet been finalized but the River Trail developer is contractually bound to replace the courts in “as good or better” condition than the current condition. Like Constitution Garden, this new location has advantages, including better access to parking and the facilities (shower, restroom) at the RiverPlex. Its adjacency to an outdoor playground is helpful for players with small children. Additionally, the relocation allows for the creation of a better volleyball experience: new and improved sand, proper drainage, and the possibility of future lighting. The new location is more visible to the public and better connected to downtown Peoria and its riverfront events. The organizer of the annual Steamboat Festival has discussed incorporating a sand volleyball tournament into their event if the courts are relocated. (The sand volleyball courts were located in this general area until moved in the early 2000s and such a tournament was part of the Steamboat Festival.)

The new volleyball courts will occupy approximately 35,000 square feet (0.8 acres) of existing parkland, based on each court measuring 30’ x 60’ plus buffer areas between courts. The proposed location is a large open field that is used for picnicking and informal games. To the extent the current recreational utility of this area is lost, it is replaced and exceeded by the new open field created in the replacement plan. (The combined loss of this 0.8 acres and the 2.3 acres mentioned above are still exceed by the creation of 3.5 acres in the replacement plan.) Below is an image of the general area the volleyball courts will occupy.
This area is part of the “Festival Park” section of the LWCF boundary. The vast majority of outdoor festivals occur closer to the I-74 bridge and would not be impacted by the volleyball courts. Three festivals – Grand Nationals, Erin Feis, and Oktoberfest – do utilize parts of this area. Park District staff has stated that these festivals could be reorganized to accommodate the courts.

S. 4.9.2 page 28 - Replacement plan for trees planted or relocated. There should be steps included to ensure the 181 trees that are planted survive. Perhaps a 70% survival rate is required over the first three years after planting. Where are these trees going to be planted within the remaining park or the replacement or both?

This section of the Environmental Assessment has been revised to reflect this information.

The Peoria Park District maintains Riverfront Park under contract with the City of Peoria, a contract that includes the care and maintenance of trees. The City, through the Park District, will ensure that at least 70% of new or relocated trees will survive; below that threshold, failing trees will be replaced. The full landscaping plans for both the conversion and replacement plans have not been finalized but all of the trees referenced in this section will be within the original park.

T. 4.11.2 page 28 - You have an opportunity here to mention temporary job opportunities associated with the development. Will any of these apartments qualify for low income purchase?

This section of the Environmental Assessment has been revised to reflect this information.

According to a public comment submitted by West Central Building Trades, the development could result in hundreds of construction jobs being created over two years. Their comment includes an estimate that the work hours of their membership have decreased 26% in the last three years. Considering that this area is within the Peoria Urban Enterprise Zone, all construction activity will be required to pay prevailing wages. Exact job creation is difficult to estimate. The US Department of Transportation in 2012 published guidance estimating on job created for every $76,900 in infrastructure spending. If this metric was applied to the River Trail development’s estimated $23.4

1 http://www.dot.gov/sites/dot.dev/files/docs/TIGER_BCARESOURCE_GUIDE.pdf
million budget, the project would create 304 jobs. The construction of the replacement park is not included within those figures but would also create jobs during construction.

The River Trail apartments are intended to be market rate residential units.

**U. 4.12.2 page 29 - The environmental contamination should be moved under the no action alternative 4.12.1 and not be placed under 4.121.2**

*This section of the Environmental Assessment has been revised to reflect this information.*

If a final revision to the EA is produced, the City will move this section.

**V. 5.1 page 30 - The last paragraph of this section should be removed.**

*This section of the Environmental Assessment has been revised to reflect this information.*

This comment was based on an earlier version of the EA (January 2017). The publicized version (February 2017) added information about the public’s ability to comment on the EA between February 3, 2017 and February 20, 2017. The section has been updated to reflect the new public comment period.