

May 13, 2026

Torre Ippolito
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Subject: USEPA 4B – 00E06050
Brownfields Grant for Rockford Area Arts Council
Armory Environmental Remediation
605 N. Main Street 61103, Rockford, Illinois 61103

Dear Torre Ippolito:

A letter from the Illinois Department of Natural Resources State Historic Preservation Office (Log #0160309026) regarding the Rockford Armory, located at 605 North Main Street, Rockford, Illinois 61103, dated April 23, 2026, included the following requirements for the aforementioned property:

- The two leaded-glass ticket windows within the lobby space must be fully retained. The project documents do not call for the demolition of these windows; however, all other windows within the building will be demolished as part of this project.
- Prior to the complete demolition of the historic steel windows (and skylights), measured drawings of each window type (including windows labeled as skylights) must be submitted to SHPO for review and approval. These required drawings must include window elevations, horizontal and vertical sections, and details at the jamb, sill, window head, mullions, muntins, operators, putty bevels, and the location of each window within the wall plane. The measured drawings will allow a future redevelopment project to install new windows that match the historic windows as accurately as possible.
- The historic wood floor within the drill hall may be removed by salvaging and palatalizing undamaged boards or sections for future restoration. The palatized, undamaged wood flooring must be kept in an area safe from exterior exposure. Sections too damaged to salvage must be thoroughly documented with photographs keyed to a floor plan and submitted to SHPO for the project file.

In response to the letter, the following steps have been taken:

- The leaded-glass ticket windows have been documented with photographs, and a reminder was given to the abatement contractor to take all measures possible to avoid damage to the windows.
- An architect has been contracted to complete the requested drawings of each window for submittal to the State Historical Society Office for approval.

- The scope of work in the building was changed to include the palletization and preservation of the wood floors in the drill hall. Areas of the wood floor that are too damaged to be saved will be documented as requested.

If you have any questions regarding this memorandum, please contact the undersigned.

Thank you,



Naomi Mullen
Staff Hydrogeologist

NM:hml

Enclosed: Illinois State Historical Society Log #0160309026



Winnebago County
Rockford

**Brownfields Grant for Rockford Area Arts Council's Armory Adaptive Reuse
Former Illinois National Guard Armory, 605 N. Main St.**

USEPA 4B - 00E06050, SHPO Log #016030926

April 23, 2026

Torre Ippolito
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Thank you for your submission notifying our office of the Brownfields Cleanup grant to the Rockford Area Arts Council for their Adaptive Reuse of the former Illinois National Guard Armory located at 605 North Main St. in Rockford, which we received on 3/09/26 (SHPO Log# 016030926). On 4/08/26 (via email) we requested additional information, and an online meeting was held on 4/16/26 to discuss the scope of work in detail. We received the bidding documents for the project on 4/16/26 and the photos referenced in the documents on 4/20 and 4/21/26. Because this project will be receiving a Brownfields Cleanup Grant from the US Environmental Protection Agency (US EPA), our comments are required by Section 106 of the [National Historic Preservation Act of 1966](#), as amended, 54 U.S.C. § 306108 (Act), and its [implementing regulations](#) (36 CFR Part 800).

In our 4/8 email we notified you and the Rockford Area Arts Council (current owner) that the Illinois State Historic Preservation Office holds a [preservation covenant for the property](#) from when the Department of Military Affairs conveyed the property to a new owner. [In a letter to a subsequent new owner](#) of the former Armory, the City of Rockford acknowledged that the preservation covenant is attached to the land/property and is not affected by any change in ownership.

The former Illinois National Guard Armory/Rockford Armory was listed on the National Register of Historic Places (NRHP) on 8/10/2000. In our meeting on 4/16/26 we discussed the abatement scope of work for character defining features (windows), primary spaces (lobby, drill hall) and historic materials (tile, plaster, metal railings, wood floor). We appreciate your patience as we completed our review.

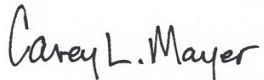
The proposed Brownfields Cleanup project (including asbestos and lead-based paint removal and abatement, and treatment and removal of lead contaminated sand) will not adversely affect the NRHP listed former Illinois National Guard Armory, provided the following conditions are met:

- The two leaded-glass ticket windows within the lobby space must be fully retained. The project documents do not call for the demolition of these windows, however, all other windows within the building will be demolished as part of this project.
- Prior to the complete demolition of the historic steel windows (and skylights), measured drawings of each window type (including windows labeled as skylights) must be submitted to SHPO for review and approval. These required drawings must include window elevations, horizontal and vertical sections, and details at the jamb, sill, window head, mullions, muntins, operators, putty bevels, and the location of each window within the wall plane. The measured drawings will allow a future redevelopment project to install new windows that match the historic windows as accurately as possible.
- The historic wood floor within the drill hall may be removed by salvaging and palatalizing undamaged boards or sections for future restoration. The palatized undamaged wood flooring must be kept in an area safe from exterior exposure. Sections too damaged to salvage must be thoroughly documented with photographs keyed to a floor plan and submitted to SHPO for the project file.

Since the building owner has indicated an intent for a future redevelopment project to utilize Federal and River-Edge Historic Tax Credits, SHPO staff recommends that additional photographs are taken throughout the project to document historic finishes (not previously documented, or visible in current photos) that will be demolished.

The project may proceed provided the above conditions are met. The measured drawings for each window type must be submitted to AnnaMargaret.Barris@Illinois.gov for review and approval. If the project's scope of work changes from that which has been submitted to and conditionally approved by this office, you must submit those changes to SHPO staff for review and comment. Failure to submit project changes for review and comment may result in an adverse effect determination pursuant to the Act.

Sincerely,



Carey L. Mayer, AIA
Deputy State Historic Preservation Officer

c: Christina Valdez, Rockford Area Arts Council