

From: [Commenter 5]
Sent: Tuesday, February 19, 2019 1:13 PM
To: Illinois-RFP <Illinois-RFP@nera.com>
Subject: Brownfield Site Comments

In response to your request for comments, I would address point #1 and suggest the definition of BROWNFIELD is too restrictive.

Although generally developed countries have a standard definition of what BROWNFIELD covers, in England there is a complementary concept of PDL, or PREVIOUSLY DEVELOPED LAND, usually abandoned industrial or commercial sites independent of their environmental status.:

*In the United Kingdom, the term 'brownfield' has a colloquial meaning roughly equivalent to the American usage described above, i.e. vacant or derelict land or property, usually industrial in nature. In terms of [British Town and Country Planning](#), however, **the meaning of 'brownfield' is more complex, and is often conflated with the technical term 'previously developed land' (PDL)**. PDL was originally defined in planning policy for housing development in England and Wales, and was carefully distinguished in such policy from 'brownfield', which was undefined but considered to be different.^{[10]:26} The definition from the 2012 National Planning Policy Guidance, which only applies to England, uses the terms 'brownfield' and 'previously developed land' interchangeably:^[11] "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.*

In other words, although Brownfield and PDL were separate entities, they became interchangeable in the sense that both BROWNFIELD sites and PDL sites had the same economic underpinnings...namely that as they existed, there was insufficient economic potential to warrant development investment.

By incentivising BROWNFIELD sites, the economic model improves and the land can be returned to productive use.

Across the state of Illinois, there are abandoned facilities which have decayed, lie unused/underutilized and no longer support the local property tax base. I would argue that the restoration of these sites would add as much economic benefit to the State of Illinois as restoring a BROWNFIELD site, and in fact would be much more likely to be realized. Establishing a provision for PDL, along with BROWNFIELD, would offer greater economic benefits and the awards could be structured to skew toward BROWNFIELD applications, with remaining REC's flowing from PDL sites up to the annual maximum procurement levels.