MEMORANDUM

TO: **Trustee Anthony Puccio, Chairperson**
Economic and Community Development Committee Members

Trustee Andrew Honig, Chairperson
Finance Committee Members

FROM: William J. Heniff, AICP, Community Development Director
Tim Sexton, Finance Director

MEETING DATE: September 13, 2021

SUBJECT: **Economic Development Fund Policy and Business Retention Economic Incentive Policy – Joint Meeting**

At the July 12, 2021 meeting of the Economic & Community Development Committee (ECDC), Community Development Department staff introduced the concept of establishing a Business Retention Economic Incentive Policy. Through the discussion, the ECDC recommended that Community Development staff proceed with developing a Policy to address such efforts.

Concurrently, the Finance Department and the Finance & Administration Committee (F&A) has been initially discussing the concept of creating and Economic Development Fund, which will serve as the funding source for worthy and eligible projects.

On September 13, 2021, the two Committees will be jointly meeting to review and consider two Policies pertaining to business retention strategies. To assist the members in this review, staff has prepared documents for discussion:

1. A Finance Department summary identifying the Policy establishing the proposed Economic Development Fund.

2. A Business Retention Policy that supplements the existing Economic Incentive Policy (EIP) to address properties and businesses that would not meet the incentive parameters set forth within the EIP, but warrant further consideration to stabilize or retain selected retail sales generating business establishments.

The draft Policies have been reviewed by Kane McKenna & Associates and their comments were incorporated into the Policy. The Village Attorney also reviewed the legal aspects of the Policy and finds that the Economic Development Fund sources as proposed and intended to preclude direct sales tax revenue reimbursements does appear to be acceptable, subject to the provisions of 65 ILCS 5/8-11-20.

RECOMMENDATIONS:

At the meeting, staff will request a motion from both the F&A and ECDC Committees that each Committee recommends that the Village Board approve the proposed revisions to the Year-End General Fund Reserve Maintenance Policy and a Village of Lombard Business Retention Economic Incentive Policy.

Staff is also seeking a recommendation to be included within the motion as to which of three possible business eligibility options is desired, as set forth on Page 9 of the draft Policy.

Finance Committee

Proposed Revision to Year-End General Fund Reserve Maintenance Policy To Establish an Economic Development Fund Reserve

The purpose of this policy revision is to amend the current Year-End General Fund Reserve Maintenance Policy in order to add the Economic Development Fund Reserve to the existing policy. This would create an additional funding for business retention incentives and transformational projects designated by the Village as key development sites. Further definition of business retention incentives, transformational projects, and key development sites will be set forth as part of a separate policy to be reviewed by the Economic and Community Development Committee (ECDC) and adoption by the Village Board.

The Year-End General Fund Reserve Maintenance Policy (Adopted July 21, 2016) is attached for reference purposes.

DISCUSSION

The challenge for Lombard is its Non-Home Rule Status. Home-rule communities can be quite creative when it comes to offering incentives and many often have the additional resources and funds to creatively address such a concern. However, non-home rule communities are much more limited in scope. The authority through 65 ILCS 5/8-11-20 to offer Sales Tax rebates, a primary source of funding for past redevelopment projects, is limited to properties that have remained vacant for at least one year, with some minor exceptions. As such, the vacancy provision contradicts what the intent of a retention policy would actually be.

One of the main drivers for creating the Year-End General Fund Reserve Maintenance Policy was to maintain a balanced budget by not relying on one-time large revenues to fund permanent annual expenses. One time large revenues in the General Fund when combined with the stable revenue sources may exceed annual expenses. The Year-End General Fund Reserve Maintenance Policy states that at the end of each fiscal year, year-end revenues over expenses should be distributed to four separate reserves:

1. An Emergency General Fund Reserve should be maintained equal to 5% of the current year's budgeted unassigned expenses in the General Fund.

2. The Village should maintain a "Revenue Stabilization" reserve with a goal of reaching 3.5% of the current year's budgeted unassigned expenses in the General Fund.

3. Remaining funds should be split equally (50/50), between the Building Reserve Fund and the Pension Stabilization Fund, up to $700,000 per year per fund. Any funds over $700,000 per year per fund will flow to the Economic Development Fund Reserve.

PROPOSED REVISION TO THE YEAR-END GENERAL FUND RESERVE MAINTENANCE POLICY

The Economic Development Fund Reserve should maintain a fund balance of $5,000,000. Note, the Economic Development Fund is also funded with 25% of Hotel/Motel Tax revenue as long as allowed by law. If the fund balance exceeds $5,000,000, the 25% of Hotel/Motel Tax revenue will stay in the Hotel/Motel Fund. Any excess funds as stated in #3 from the Building/Pension Reserves will flow into the Economic Development Fund.

The Village Board has the option to reduce, not fund or amend this policy in any way.

YEAR-END GENERAL FUND RESERVE MAINTENANCE POLICY
Adopted July 21, 2016

Maintaining reserves is a prudent management practice. Reserves are an important indicator of the Village's financial position and its ability to withstand adverse events. At the end of each fiscal year, year-end revenues over expenses should be distributed to each reserve in the following order:

1. An Emergency General Fund Reserve should be maintained equal to 5% of the current year's budgeted unassigned expenses in the General Fund. The Emergency Reserve may be used for unexpected, large-scale events where costs in excess of $1 million are incurred, and immediate, remedial action must be taken to protect the health and safety of residents (e.g. major flood, earthquake, event requiring significant overtime, etc.).

2. The Village should maintain a "Revenue Stabilization" reserve with a goal of reaching 3.5% of the current year's budgeted unassigned expenses in the General Fund. This reserve may be used to provide funding to temporarily offset unanticipated fluctuations in on-going revenues or unanticipated events, such as unexpected external mandates, reductions in state shared revenues, closure of large sales taxpayer, etc. The reserve funds will provide time for the Village to restructure its operations in a deliberate manner to ensure continuance of critical Village activities. Revenues should be down at least 1.5% compared to prior year budget to utilize this fund.

3. Remaining funds should be split equally (50/50) between a Building Reserve Fund and a Pension Stabilization Fund.

    - The Building Reserve Fund may be used to help fund the cost to build new, replace, or complete a major renovation to an existing Village owned building.

    - The Pension Stabilization Fund may be used if the annual actuarially determined pension funding requirement exceeds the total statutorily permissible annual property tax levy. Funds over $1M should be distributed as follows to pay down unfunded pension liabilities:

        - Illinois Municipal Retirement Fund: 20%

        - Police Pension Fund: 40%

        - Fire Pension Fund: 40%

Business Retention Economic Incentive Policy Review
Joint Discussion Report

Prepared for the Lombard Economic & Community Development Committee
and the Finance Committee

September 13, 2021

Business Retention Economic Incentive Policy/Review – Joint Discussion Report

SECTION 1: EXECUTIVE SUMMARY

The Lombard Village Board's 2021 Strategic Plan effort identified the need to address business retention elements as part of our larger economic incentive efforts. The existing Village Economic Incentive Policy (EIP), last updated in 2016 did not fully address business retention elements and established polices and guidelines that would preclude some worthy or necessary projects from being eligible for an incentive under the established program parameters.

On a parallel track, the Village recognizes that revenues generated from retail sales tax activity is one of the primary sources of revenue to fund Village operations and without such sufficient revenues from existing, expanding or new businesses may have an adverse effect on the Village delivering core or enhanced services. A primary purpose and goal of the Village is to help ensure that existing sales tax revenues, which helps pay for all municipal government services, are maintained or even strengthened in the immediate and possibly longer-term. However, intrinsic to this discussion is the larger efforts of business retention and even expansion.

Recognizing that it may be easier to keep a retail business in the community rather than seeking a new business, the Village is seeking to establish an Economic Development Fund that would create a revenue source for projects that otherwise could not be funded through the previously adopted EIP. The Policy would supplement the existing EIP and would set a negotiating framework for staff, Village officials, and the business community to address business retention and transformative projects that may stabilize or strengthen retail business activity.

The approach to this Policy is to supplement the parameters already established within the EIP and address situations that are above and beyond the EIP parameters.

SECTION 2: PROGRAM/POLICY NEED

Village staff introduced to the Economic & Community Development Committee (ECDC) an effort to supplement our established Economic Incentive Policy with a companion Business Retention Economic Incentive Policy in July, 2021. This introduction is partly undertaken to implement the Village Board's ongoing Strategic Plan to address business retention efforts, as well as to address inquiries made to staff regarding retention incentives.

From an Economic Development perspective, many municipal retention programs focus upon direct engagement with key business entities to address or reduce private sector businesses from relocating, downsizing or closing. The engagement role establishes partnerships so that items that could be addressed locally are considered to the greatest extent possible. The "explore all options" and "economic development is whatever the business deems it to be" philosophies were the pretexts of past engagement efforts. Some inquiries may not have direct economic components (e.g., changing parking regulations on a street, providing for easier applications for outside seating, etc.), but address a business concern. In other cases, external market forces independent of any Village actions and incentives would have had no benefit.

There are situations in which requests are made to address changing market competitive conditions, technology changes, or other external forces. The challenge is to address it prior to a closure and when financial requests are sought. This engagement is particularly vital when such discussions are by high retail sales tax generating entities who seek an incentive to remain within the Village.

The Village's Economic Incentive Policy (EIP) was adopted in 2015 and amended in 2016. The EIP intent provides staff, interested parties and the public with initial direction as to the level of support a request may receive by the Village. The EIP structure was to provide incentives for qualifying business entering the Lombard market or expanding their business operations, with additional revenues to be generated through the larger effort. The existing EIP does not offer provisions pertaining to many business retention and transformative projects, in the following respects:

1. For existing businesses, an incentive may be sought to keep a business in Lombard;
2. The structure of the EIP that seeks to improve or expand facilities does not sufficiently address existing business situations (i.e., 50% caps on new generated revenue, preservation of all existing sales tax revenue generated by a business)
3. The EIP does not address loss-leader projects that can be transformative and may stabilize existing sales tax dollars, but do not generate significant or sufficient revenues of their own accord to warrant an incentive itself.
4. The EIP does not sufficiently address the phrase of "it may be easier to retain a business than find a new one".

Utilizing economic development partners (i.e., other taxing bodies as well as local, DuPage County and State economic development entities) may provide some opportunities for assistance, but in other cases it may simply be that the Village is informed that a business relocation is under consideration in another community. As such, they are seeking assistance to help cover costs of modernization or other site improvements that are hoped to keep a business operating at acceptable levels, but otherwise would not guarantee large increases in sales volume, property tax increment, or employment benefit.

Establishing a Retention Incentive Policy is often a challenge for government officials, as consideration must be undertaken to determine whether such an incentive will actually stabilize or guarantee a business's long-term retention. But positively, sometimes it is more beneficial to offer an incentive to a business that intends to improve or expand their facilities, rather than knowingly see a business leave and then having to undertake steps to recruit a new business.

Compounding the challenge for Lombard is its Non-Home Rule Status. Home-rule communities can be quite creative when it comes to offering incentives and many often have the additional resources and funds to creatively address such a concern. However, the authority granted to non-home rule communities is limited in scope. The authority through 65 ILCS 5/8-11-20 to offer Sales Tax rebates, a primary source of funding for past redevelopment projects, is limited to properties that have remained vacant for at least one year, with some minor exceptions. As such, the vacancy provision contradicts what the intent of a retention policy would actually be.

To respond to such future requests, a Business Retention Policy should answer questions pertaining to:

- Funding Sources – existing and proposed
- Justification touch-points (i.e., why is an incentive needed)
- Levels of financial and capital improvement engagement by property owner/tenant(s)
- Reconciling "pay-as you go" and any additional increment provisions or incentive sources (e.g., TIF or Business District) that may be requested
- Risk analysis
- Review of impact under stay or go scenarios
- Economic incentive request review by third-party entities (as currently done by Kane McKenna & Associates (KMA))
- Minimum annual sales tax generation/impact
- Whether the incentive is for a struggling business or a stabilized or expanding one

The ECDC supported additional review of a policy by Village staff. Supplemental questions and issues raised by the ECDC include:

- Applicants should answer questions pertaining to cannibalism and benefits.
- Any policy review effort should include a review by KMA.
- The Finance Committee and Village Board should review a future policy.
- Claw back provisions should be considered to go along with any "prove-up requirements".
- Review should also consider past investment in the community, number of years in Lombard and the amount of sales tax generated.
- Quantifiable data should be a part of any request.
- Determination of a government need for and incentive should be vetted and should not be applied toward businesses that are struggling or mismanaged, otherwise the incentive may not result in any material benefit but at a Village cost.

Retention Incentive Discussion

Incentives to keep existing businesses is not without its own challenges, as it can be seen as a source of unnecessary funding from governments back to businesses and, on a macro-scale, a zero-sum benefit that may result. However, for retail sales tax generators, these businesses directly contribute through their remittance of sales tax revenues which are used to pay for the Village's core and enhanced services. Such funds can also create a catalyst for further investment or at a minimum stability surrounding business sales tax revenues by keeping key corridor areas economically viable.

When prioritizing programs for funding, there is significant discussion supporting business retention efforts ahead of business attraction, as such businesses are already established, speculation is not as great of a concern and it can give the secondary message of supporting established businesses as much as new businesses. Such business retention strategies can take a variety of forms, but for purpose of this review, financial inducements are the core review element.

SECTION 3:
LOMBARD ECONOMIC INCENTIVE POLICY
(BUSINESS RETENTION, EXPANSION & TRANSFORMATION)

The Village of Lombard has identified strategies that could be undertaken to assist the private sector in the development of key properties and/or attracting desired businesses. Notable actions include, but are not limited to, adoption of the following:

1. An Economic Development Strategies Report/Plan in 2011
2. The Lombard Economic Incentive Policy, adopted in 2015, and updated in 2016
3. Adoption of Tax Increment Financing Districts and Business Districts
4. The 2021 Village Board Strategic Plan effort

These efforts attempt to meet the Village Board's goal to "continue to expand economic development strategies to attract, maintain or expand business opportunities within the community, to include creating innovative solutions to fill commercial vacancies and innovative solutions to vacant lot development." Past plans have identified four economic development goals:

- Retain, expand and attract commercial and industrial businesses
- Promote general economic development and business growth
- Increase municipal revenue sources and identity incentives for specific development opportunities
- Encourage redevelopment along key commercial corridors

Of the goals noted above, emerging trends and economic development efforts should address:

1. Existing Village sales tax revenues remitted by larger sales tax generating businesses;

2. Businesses and targeted properties identified through adopted Village policy, plans or directives that have been identified as "key development/redevelopment sites" – a map depicting these sites is attached;

3. Transformative businesses that may not generate significant sales tax revenues but may stabilize or strengthen other businesses in close proximity to the establishment;

4. Desired businesses, that if they left the Village, would result in a substantial market segment leakage within the community, based upon North American Industry Classification System (NAICS) classifications.

5. Business innovation and technology adaptation to meet anticipated future market demands.

Direct Business Retention Projects

The retention policy parameters help ensure existing business entities to understand the role of the Village and what could be favorably considered. It also reduces the amount of speculation or uncertainty that may occur absent such a formalized policy. Such retention policies include:

1. Retention incentives can be considered in such cases that maintain and strengthen retail sales revenues generated by established businesses. A primary focus shall be the larger sales tax generating entities defined as those establishments seeking to improve or expand facilities which are among the highest generating retail sales tax entities for a period of at least three years immediately preceding the incentive request.

2. Incentives for retail sales tax generating desired businesses that if they left the Village would result in a substantial market segment leakage within the community, based upon NAICS classifications.

3. Incentives to advance retail sales tax business innovation and technology adaptation to meet anticipated future market demands.

Transformational Projects Advancing Retention Efforts

The Village Board also recognizes that some projects may serve as catalyst projects to transform or stabilize sales tax revenues within an area or corridor. These types of projects may not generate substantial sales tax revenues in of their own through their existing or anticipated business operations upon opening, but the impact of such establishment may directly or indirectly reduce erosion of generated sales tax dollars. Transformative businesses may include those that may not generate significant sales tax dollars but may stabilize or strengthen other businesses in close proximity to the establishment. In these cases, projects may consist of existing businesses, development projects or new projects that may not generate significant sales tax dollars but will create synergies to stabilize or strengthen existing retail establishments.

Goals and Policy Statements

1. Given current statutory limitations, such retention and transformational programs would not rely upon the issuance of bonds or other financial constraining tools by the Village. However, program funding shall be primarily based upon existing and projected revenues

within the proposed Lombard Economic Development Fund. The Village's non-home sales tax designated for capital improvements is specifically not to be eligible as part of an incentive.

2. Eligible businesses must undertake a significant capital investment to improve or expand their facility/business and meet one of the two following categories:

   a. Be located within an identified Retail Transformation Zone, as approved by the Village; or

Committee members – choose one of the three below:

Identified as being among the Top 15 retail sales tax generating businesses during one of the preceding three years.

Having a past track record of generating a minimum of $100,000 in retail sales tax dollars over the past three years. (22 business currently meet the criteria)

Having a past track record of generating a minimum of $250,000 in retail sales tax dollars over the past three years. (10 business currently meet the criteria)

3. Developers and businesses are strongly encouraged to discuss their projects with staff prior to seeking approval of any incentives. This step is critical to determine incentive need, market conditions and level of resources that may be needed to meet desired outcomes. Such engagement may also require engagement with the Village's economic development consultant team – to that end, disclosure of relevant documents and data to determine incentive appropriateness should be expected.

4. All discretionary incentives shall still be subject to a "but for" component. There should be a finding by the Village that the project and the incentive is necessary for retention or stabilization purposes, otherwise it could:
   a. result in a business relocating outside the Village or significantly curtailing operations,
   b. create an adversely negative financial impact upon the Village's ability to perform essential services at acceptable levels, or
   c. result in costs being borne to Village residents or businesses, through the Village's General Fund or other discretionary funds.

5. Incentives will be granted only at the level necessary to stabilize an existing business, business corridor or enhance the project's growth and generation of additional sales tax dollars.

6. Preference shall be given to projects in which sales taxes or revenues historically received by the Village will not be reduced below the base year of any incentive, as established by the individual redevelopment plans, after an incentive is approved.

7. The Village will not waive permit or development fees, if applicable, but such fees may be considered as part of the overall pro-forma of the overall construction/development cost that can be used as a basis for an incentive, or if the Village determines that including the permit costs in the incentive creates a net economic benefit to the Village.

8. All projects receiving incentives must be consistent with adopted Village plans and must comply with all federal regulations, State Statutes and adopted Village codes.

9. To the greatest extent possible, incentives shall have a performance-based element to measure the success of an incentive. While such measure may or may not be directly related to the sales tax dollars generated for a business, each project shall identify proper metrics for determining the specific measures in which performance-based measure shall be measured against. Such measures can include sources beyond sales tax data and can include impacts upon Equalized Assessed Valuations (EAV) data and other generated tax revenues.

10. The Village shall require periodic reporting evidencing compliance with the requirements of the program and measuring the specific and overall economic benefit to the community.

11. To the greatest extent possible, the Village should continue to receive the first revenues generated by a project. This can include revenues that are currently received by the Village for existing or past sales tax generations, the costs of performing municipal services anticipated by the project as well as any incidental administrative costs.

12. Retention incentives should be established in such a manner that the greatest percentages of Village reimbursement shall be based off of existing revenues, with the possibility of an increase in the amounts based upon satisfactory compliance and performance of the business establishment. Such percentage should be readily identified as part of any agreement.

13. A project will be more favorably reviewed if the retention or transformative project:
    a. represents significant private-sector financial capital investment above current conditions;
    b. promotes a higher and better use of the property as determined by the Village through its adopted plans;
    c. provides a positive fiscal and economic impact to the Village;
    d. adds new and unique retail business tenants to the Lombard market;
    e. mitigates any potential negative impacts to the surrounding area;
    f. closes an existing leakage in retail sales tax dollars within the Village; or
    g. addresses impacts of consumer expenditure cannibalization, or in the reverse, the impact of the loss of the business in its entirety on remaining Village businesses.

14. Each agreement will be considered individually, based solely upon the merits of the project as defined at the time of the agreement consideration. No previous proposal or agreement should be considered as a precedent for the consideration of other projects.

15. As with all of the Vilage's Economic Incentive Policies, this Policy is not a property owner or business entitlement, or a commitment to spend on behalf of the Village but rather, any incentive is subject to availability of funds and is subject to review and sole discretion by the Village.

Consideration of any incentives which include a financial expenditure by the Village shall be set forth within a development/incentive agreement or other like document. Said agreement shall specifically identify the nature of the request, the rationale and justification for the request and the source of funding that is intended to be utilized as part of the project.

SECTION 4: CHECKLIST QUESTIONS FOR CONSIDERATION OF RETENTION & TRANSFORMATIONAL INCENTIVES

In working with a party seeking a retention or transformational incentive, the Village needs to be aware of the general policies in considering such request and act in the best interest of the Village, residents, businesses, and taxpayers. In consideration, such questions should be raised about any such incentives and how they relate to the Village's overall economic goals. For transparency and to provide a general understanding of the nature of the agreement, the questions raised below shall be identified and answered by the requestor and the Village prior to final consideration of any incentive agreement. These questions include, but are not limited to:

1. **Retain, expand and attract retail sales generating businesses**
    - Does the business fill a specific or unique market niche that, if relocated or down-sized, would have a realistic impact of not being reabsorbed into the existing commercial market?
    - Is it an existing Lombard business looking to expand and grow with its proposed retention request?
    - Will the existing business maintain or create additional jobs or other identified economic growth for the Village?
    - If a transformational project, are there quantifiable measures to justify such a request?
    - Will the business make a significant investment in improving or expanding facilities?

2. **Promote general economic development and business stabilization and growth**
    - Does this project create or retain jobs, or are they anticipated through job multiplier quotients within the given area? Additional questions will need to be answered such as: how many jobs; is this an increase or decrease to the current number of jobs on site; do the jobs pay a prevailing wage, minimum wage, or more; and what kind of job types are being created.
    - For catalyst projects, how does the project include physical enhancements to better the surrounding properties?
    - Will there be public improvements which would benefit the Village?
    - Will innovative development technologies or modernization of business activity or projects be incorporated into the project?

3. **Municipal revenue sources and identity incentives for specific development opportunities**

- Is the equalized assessed value (EAV) of the property projected to increase and positively impact the taxing districts?
- Will generated sales taxes exceed what is being generated at the site currently?
- What would be the revenue impacts if the business is not awarded a grant, or completely leaves the Village?
- Will there be other financial benefits gained?
- Will the project generate increased stays at Lombard hotels?

4. **Encourage transformative redevelopment along key commercial corridors**
   - Does the project address a property that has been underutilized, excessively vacant or functionally obsolete?
   - Are the conditions associated with the property a function of market conditions?
   - How will the improvements benefit the neighboring properties?
   - Is the property called out for redevelopment and therefore consistent with the adopted Village documents and policies?

5. **Discussion & approaches toward reviewing such requests**
   - What are the minimum performance thresholds that must be met?
   - What is the actual Capital Investment by tenant/landlord/property owner?
   - Are there precedent conditions that must be met prior to determining incentive eligibility?
   - What metrics will be used to measure and quantify the requested incentive?
   - Will there be a bifurcation effort to determine new sales tax generation vs. retention incentive percentages?
   - What measures are in place in case the business ceases operation – by choice or by market conditions?
   - Is there a need for Non-Compete Provisions to ensure that the incentive is not impacted by a business located within a relevant geographical area that would affect the performance of the existing business?
   - What guarantees will be incorporated into the agreement for non-compliance (i.e., claw-back provisions or a waterfall reduction of funds based upon continued operations)
   - Is there a need to address transfer, sale of business or other assignment provisions?
   - How would incentives be addressed if the nature of the business changes, directly or through market conditions?
   - Are there provisions in place to address eligible amounts (i.e., if state statutory reimbursements change, does this create an opener opportunity)?

6. **Transformative Redevelopment / Revitalization Projects** – These are projects that advance the Village goals for addressing blight, economic obsolescence, excessive vacancies, possible pending vacancies, or projects that address stated redevelopment objectives.
    - Does the project meet the Village vision, goals and objectives of the Comprehensive Plan and other approved documents?
    - What is the breakdown of existing and new financial investment, excluding aesthetic or property maintenance items?
    - Does the project promote a better use of the property or improve the financial performance and/or viability of the existing property?
    - Does the project represent superior design aesthetics that substantially and significantly exceed current design standards and are worthy of an incentive?
    - Does the project mitigate any negative impacts to the surrounding area or provide external benefits and functionality?

7. **In-kind Economic Incentives** – While not directly financial in nature, these transformative incentives identify activities that the Village would undertake to advance a construction project, but may not result in a direct financial contribution to the project. These items to be identified include, but are not limited to:
    - Additional staff assistance through the project formulation through the permitting process;
    - Incorporation of preliminary review activity through the zoning entitlement process; and/or
    - Incorporation of "fast-tracking" of permit activity, if necessary to facilitate the development.

The aforementioned questions are intended to provide a level engagement with the incentive beneficiaries, elected officials and other interested individuals in consideration of whether such an incentive is worthy of favorable consideration.

Exceptions to the Policy

It is good practice to identify the process for consideration of projects that are deemed to be worthy of an incentive consideration but are not meeting all of the parameters of the overall policy. In such cases, the policies being modified should be identified and the reasons for the exceptions. Such exceptions should be disclosed in the evaluation process and in Village Board actions approving the incentive.

MAP DEPICTING KEY DEVELOPMENT SITES

Village of Lombard Key Development Sites

September 2021