



Thomas P. McNamara
Mayor
Office of the Mayor

Narrative Information Sheet: City of Rockford: Multiple Sites: Site 1:325 S. Madison Street and Site 2: 128 Kishwaukee Street

1. Applicant Identification

City of Rockford
425 East State Street
Rockford, Illinois 61104 -1068

2. Funding Requested

- a. **Grant Type:** "Multiple Site Cleanup"
- b. **Federal Funds Requested:** \$275,000
- c. **Contamination:** "**Hazardous Substances**"

3. Location: City of Rockford, Winnebago County, State of Illinois

4. Property Information:

Site 1: Former Rockford Watch Factory, 325 South Madison Street, Rockford, Illinois 61104

Site 2: Former Lloyds Hearing Building, 128 Kishwaukee Street, Rockford, Illinois 61104

5. Contacts

- i. **Project Director:** Rob Wilhelmi, Brownfields Redevelopment Specialist
425 East State Street, Rockford, Illinois 61104
P: 779-348-7425 F: 815.967.6933
Email: robert.wilhelmi@rockfordil.gov
- ii. **Chief Executive:** Mayor Thomas P. McNamara
425 East State Street, Rockford, Illinois 61104
P: 779-348-7150 F: 815. 967.6952
Email: haley.galarza@rockfordil.gov



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6. Population: 152,871 (2010 Census) 148,460 (2013-2017 American Community Survey, five year estimates)

7. Other Factors Checklist: Not Applicable

8. Letter from the State of Illinois (attached)



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/524-2084

November 19, 2019

Wayne M. Dust, AICP
Planning Contractor

Dear Mr. Dust,

The Illinois Environmental Protection Agency (Illinois EPA) has received your request for a letter of acknowledgement for an upcoming Brownfields Cleanup Grant application to U.S. EPA. The City of Rockford is applying for a \$275,000 Multi-site Cleanup Grant for Hazardous Substances.

The focus of the grant will be to conduct cleanup activities at 325 S. Madison Street (Rockford Watch Factory) for \$200,000 and 128 Kishwaukee Street (Lloyd's Hearing Building) for \$75,000.

Illinois EPA acknowledges the City of Rockford's efforts to obtain federal Brownfields funds for this project. If you have any questions, I may be contacted at the above address or telephone number, or at Jenessa.N.Conner@illinois.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jenessa Conner".

Jenessa Conner, Project Manager
Voluntary Site Remediation Unit
Remedial Project Management Section
Division of Remediation Management
Bureau of Land

cc: Matt Didier – U.S. EPA Region 5

4302 N. Main St., Rockford, IL 61103 (815)987-7760
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City of Rockford Cleanup Grant Application: Multiple Sites: 325 S. Madison Street (Former Rockford Watch Factory) and 128 Kishwaukee Street (Former Lloyd's Hearing)

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area: The City of Rockford, Illinois, a city of 152,871, (2010 Census) was once a thriving manufacturing community with over forty percent of its workforce employed in manufacturing as recently as 1980. Rockford has since faced decades of economic decline with manufacturing jobs generally being replaced by much lower paying service industry jobs. Currently, 21.4% of the workforce is employed in manufacturing which is still on the decline resulting in additional lost jobs and more vacant factory Brownfields each year. The City has 970 Brownfields of all shapes and sizes according to the 2012 survey performed by Fehr-Graham for the Rockford Metropolitan Agency for Planning. Since then, there have been several new Brownfields added, including the 36-acre Rockford Products site with almost 600,000 square feet of vacant factory space at 707 Harrison Avenue and the 15-acre Essex Wire site at 2816 N. Main Street. These are just two examples of the fact that because of the heavy reliance on manufacturing in the Rockford economy historically, and the decline in manufacturing locally from 40% to 21.4 % of the local workforce, this change in the workforce has been accompanied by a proliferation of Brownfields. Rockford's labor force is 67,738 and its unemployment rate is at 6.6 %, compared to the State figure of 3.6% and the US figure of 3.3%. Rockford has the second highest unemployment rate for communities in Illinois and the highest rate for any community in Illinois with a labor force of more than 14,000. (Illinois Department of Employment Security, September 2019). Founded in 1837, Rockford forms the central City in the Rockford, Illinois Metropolitan Statistical Area. Early settlement and industry took place along the west bank of the Rock River, immediately south of the current Downtown, with early industry using waterpower for industrial processing. This area was later served by the first railroad in the Rockford area that is now part the Union Pacific R.R. This rail line forms the southern border of Rockford's Downtown and is located adjacent to **Cleanup Site #1 at 325 S. Madison Street** and just three blocks south of **Cleanup Site #2 at 128 Kishwaukee Street**. Three additional railroads converged in this area, and industry spread in all directions from this early railroad confluence. The two Cleanup Sites, **325 S. Madison Street and 128 Kishwaukee Street**, are among the northernmost of the remaining industrial Brownfields in Rockford on the east side of the Rock River. South and east of the two Cleanup sites are several major older industrial areas plagued by Brownfields. Both cleanup sites are located at the northern edge of the Midtown Business District Association and the southeast edge of the River District Association. Downtown Rockford, which was once bordered to the south, east and west by major industrial employment centers, including the two Cleanup sites, began declining employment trends in the 1950s, as new plants were constructed on larger outlying tracts of land and major industrial parks located 4 to 5 miles from Downtown. With the loss of nearby manufacturing jobs, Downtown Rockford, which peaked in the 1950s and 1960s, has experienced a steady decline until recently when a few investors began to acquire vacant buildings for renovation. The supply of vacant Downtown Buildings, however, far exceeds the demand for the renovated space. This is one of the major reasons why this Cleanup Grant is needed as both Cleanup Sites need environmental cleanups before developers would be willing to invest in them.

Target Area Description: Cleanup site 1, the Rockford Watch Factory Building at 325 S. Madison St., is located within Census Tract 10. Cleanup site 2, 128 Kishwaukee Street, is located in adjacent Census Tract 11. These two Census Tracts and the two adjacent Census Tracts 12 and 13 form this Target Area, one of the more economically distressed areas in Rockford. Each of these four census tracts is

impacted by the presence of Brownfields, a shortage of jobs, significant poverty, and a shortage of basic services in this area. The four Census Tracts that comprise the Target Area are within the CDBG Block Grant Eligible Area, and the 325 S. Madison site is located within Rockford's **Opportunity Zone**. The Target Area population is 8,527, only 5.93% of Rockford's Population.

ii. Description of the Brownfield Sites

Cleanup Site #1 325 S. Madison Street: The City-owned Site at 325 South Madison Street, the former Rockford Watch Factory, was constructed during 1875-1876 and is adjacent to the Union Pacific (UP) spur line to the west of the building. The site slopes approximately 15 feet from Madison Street west to the rail line, exposing the basement level of the Watch Factory building towards the west. Three stories rise above the basement level and the building totals 27,000 square feet. This site was originally flanked by industry. The W.F. and John Barnes plant and the Ward Pump plant were located to the west while a large ComEd coal fired power plant and a concrete batch plant were located to the south. All four of these adjacent sites have been cleaned up and the W.F. and John Barnes site, which was later Ingersoll, was redeveloped into the UW Health Sports Factory, a \$24 million dollar investment that included a USEPA Cleanup Grant and Assessment Grant Funds. The Rockford Watch Factory site itself was, until 2015, flanked by several large industrial additions and a 4-story School District Administration building. These structures have all been removed by the City of Rockford, and the Rockford Watch Factory is now surrounded on the north and south by support parking for the UW Health Sports Factory. To this point, the City has used a total of \$226,730 in Supplemental Revolving Loan Funds to address soil contamination on the Watch Factory site and to remove asbestos from the Watch Factory additions before they were demolished, leaving the original 1875-76 structure that is located in the Haight Village National Historic District. The proposed Cleanup Grant is to remove the asbestos in this structure to enable the renovation and repurposing of this structure for mixed commercial/residential uses that are complimentary to the adjacent UW Health Sports Factory and support the Target Area by providing jobs and services. The City performed an asbestos inspection of the building in January 2015 and identified approximately 20,500 square feet, 2,000 linear feet and 700 individual units of asbestos containing building materials (ACBMs).

Cleanup Site #2: 128 Kishwaukee Street. The 128 Kishwaukee St. Building has its origins in the early local and regional transportation system. It was constructed in 1913 to serve as the maintenance and storage facility for Rockford's streetcars and Interurban rail cars. It occupies the site of an earlier wooden building with the same function. During the 1960's, this building was remodeled into an office building after the transit bus storage was relocated. It is located at the east edge of Downtown and at the north edge of Midtown District, in proximity to the East State St. and Seventh St. Corridors. These Corridors are two of the earliest commercial corridors and are often referred to as "Streetcar Commercial Corridors." Although it is not far from the thriving areas of our Downtown District, 128 Kishwaukee St. is primarily surrounded by vacant structures of many types including the historic Midway Theatre. The 128 Kishwaukee St. Building has been vacant for over 10 years and is severely blighted with a crumbling facade and partially collapsed roof. The known contamination at the 128 Kishwaukee St. Site includes asbestos within the building along with lead and carcinogenic Polynuclear Aromatic Hydrocarbons (PNAs) in soil to the south of the building as well as beneath the building footprint. The 128 Kishwaukee St. site is .79 Acres and was purchased by the City of Rockford on December 20, 2016 after the building had sat vacant and deteriorating for several years and was taken by the County Tax Trustee for delinquent taxes. Once asbestos has been removed from 128 Kishwaukee St. using TIF funds, the City is proposing to demolish the structure with assistance from

the Department of Defense's Innovation Readiness Training Program. The City will strive to provide jobs, retail and other services for the Target Area at this location through new development on the site that will be guided by our Comprehensive Plan.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Site 1: 325 South Madison St. The City of Rockford has been a major player in the revitalization efforts surrounding Site 1, especially in regards to the following initiatives: 1) the environmental cleanup and Brownfield Redevelopment of the former Ingersoll site into the UW Health Sports Factory , a 100 ,000 sq. ft. facility for Rockford Youth Sports immediately west of site 1; 2) removal of several deteriorated additions to the original Rockford Watch Factory Building and other structures to provide parking for the Sports Factory as well as the 325 S. Madison Street Site once it is renovated and repurposed; 3) the purchase and removal of the concrete batch plant immediately south of Site 1; 4) assistance to COM ED in their environmental cleanup of their 20 acre site one block to the south; and 5) City assistance to a private developer in the redevelopment of the nearby former YWCA facility into a lodging facility to support the Sports Factory. All of these initiatives are consistent with the River District Framework Plan, adopted in 2006, which has been adopted as part of the City's Long-Range Comprehensive Plan. Reuse of this site as well as Site 2 are being discussed at the Project Partners meetings identified in section 2 b.

Site 2: 128 Kishwaukee St. The City of Rockford hopes to provide additional retail and office facilities at this site, as identified in the Comprehensive Plan, once this site is ready for redevelopment, as sited. To this point, the City has focused its efforts on supporting businesses on East State Street, one-half block to the north and on working with developers on the renovation of the adjacent Historic Midway Theatre, vacant for the last 15 years. Cleanup and redevelopment of the 128 Kishwaukee Street site would be Catalytic to the renovation and repurposing of the adjacent Midway Theatre, a high priority in the River District Framework Plan. Both the Midway Theatre and 128 Kishwaukee would provide jobs and services to the Target Area.

ii. Outcomes and Benefits of Reuse Strategy

Site 1 - 325 South Madison St. Once Cleanup is complete, this project will stimulate further revitalization in the Target Area and the nearby commercial corridors. This site is located in an **Opportunity Zone** which provides additional financial incentives for redevelopment. Several positive outcomes and benefits would result from this cleanup and building renovation at 325 S. Madison St. including providing an estimated 60-70 jobs as well retail services and other services that would be filled locally and would benefit the Target Area. It would also further support Environmental Justice efforts. As part of this redevelopment, it is anticipated that the City will successfully negotiate with ComEd for the connection of the recreational pathway on the adjacent U.W. Health Sports Factory site to the Rockford "Rails to Trails" Pathway Bridge (former railroad bridge) over the Rock River. This non-economic enhancement of this area will provide a major recreation opportunity for the Target Area. The renovation of this building will also include energy efficient measures such as HVAC units and lighting as well as water-conserving plumbing, as required in Rockford's Building Code. Solar panels will be evaluated for the south facing roof that extends 140 linear feet.

Site 2 - 128 Kishwaukee St. Once complete, this site will be a major catalyst to the redevelopment of the adjacent historical Midway Theatre because of the increase in jobs and business activity. The City is prepared to provide incentives to bring about this transformation, especially in the form of TIF incentives. The City will require jobs to be filled locally within the Target Area as a TIF specification. In addition, this site is adjacent to the **Opportunity Zone** where there is potential to spur economic growth on both sides of the **Opportunity Zone Boundary**.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

For 325 South Madison St., it is anticipated that several financial incentives will be required to bridge the gap between the cost of renovation and redevelopment and the ability of the development to provide income to the developer. Additionally, this site is located in the Rockford River Edge Redevelopment Zone and is located in the Haight Village National Historic District. These two designations prequalify this site for the 25% Federal Historic Tax Credits and the 20% State Historic Tax Credits. The estimated cost to fully renovate the building is \$5.4 million. Unfortunately, not all renovation costs are eligible for these tax credits. Based on similar projects the City has estimated that the Historic Tax Credits will cover only 39% of the \$5.4 million renovation costs. This site is also eligible for New Market Tax Credits and is located in the **Opportunity Zone**, both of which will be pursued to bridge the project funding gap. For 128 Kishwaukee St. the City will seek \$230,000 in Department of Defense Innovative Readiness Program for demolition costs (The City will use TIF for asbestos removal). The City will market developers once the site is clear and cleanup is completed. TIF and New Market Tax Credits will be pursued for the new construction project once the site is ready for reuse. Also, as a TIF fund requirement, the City will require local hiring within the area.

ii. Use of Existing Infrastructure: Site 1, 325 S. Madison Street is surrounded by very recent infrastructure improvements including the large parking lot that surrounds the building constructed during 2015-2016 and the reconstruction of Madison Street that included water and sewer line replacements. Site 2, 128 Kishwaukee Street is located at the intersection of Kishwaukee St. (Illinois 251) and 1st Ave. (Business US 20). These two major streets are in a good condition and have been regularly improved by the State of Illinois Department of Transportation when needed. Both sites are free of infrastructure needs and will make use of the extensive infrastructure present, including public water, sanitary sewer, storm sewer and private utilities.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding: The Target Area has a population of 8,527, only 5.93% of the City of Rockford population. The Target Area is low income and has a far larger share of environmental issues than its small population, as demonstrated herein. As a whole, the City of Rockford's need for Cleanup Grant funding is primarily due to: 1) the City's declining economic position; 2) the huge number of vacant, abandoned factories in our extensive Brownfields inventory; 3) the severe shortage of private developers willing to invest private sector funds into these Brownfields, especially those where cleanup has not occurred; and 4) the deteriorated condition of many of these structures. Overall, the City has no available funds for the cleanup of these sites because of these factors. More detail follows: 1) The City's Economic Position: the City has forecasted a Budget Deficit of \$3.6 million in 2021 with increases each year to \$12.5 million in 2025. The growing deficit is a result of increasing operating costs in the general fund, especially pension contributions. Revenue from property taxes and sales taxes is not keeping up with expenditures. 2) The extensive number of Brownfields: 970 Brownfields properties that are not contributing to the tax base or to job creation 3) Several City-owned and privately-owned properties remain vacant: the City has not been able to regularly attract developers to vacant commercial or industrial buildings, even in our Downtown, where a slow but steady rejuvenation is taking place as a result of numerous city efforts, including the creation of TIF Districts, the issuance of Requests for Proposals (for City-owned properties) and promoting properties that are near other major successful Brownfield Redevelopments. City-owned buildings are likely to redevelop only if environmental issues are addressed through Cleanup Grants. The local

economy is severely impacted by these vacant properties and the resulting loss of property taxes and the shortage of City funding sources make it imperative to receive Cleanup Grants for Brownfields, even those near Downtown.4) the deteriorated condition of many Brownfields. The condition of 325 South Madison St is fair but worsening. 128 Kishwaukee will require demolition-reuse is not economical. The conditions of the buildings are discussed in Section 3 a. Without the Cleanup Grant, these very visible Brownfields will continue to contribute to blight, property tax loss and the decline of adjacent neighborhoods rather than become a positive catalyst for the Target Area.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: The Brownfields in this Target Area pose threats to sensitive populations that are prevalent in the Target Area, as summarized on the following pages in 2. ii (3). Based on the Phase I and Phase II Environmental Site Assessments that have been performed within this Target Area, these residents have potentially been exposed to a large number of health risks and environmental impacts due to more than a hundred years of industrial land use taking place at these nearby Brownfield sites. The 325 S. Madison St. Site is located just six blocks from a large metal recycling plant, six blocks from a large salvage yard, one block from the former coal-fired power plant and 9 blocks from the former furniture manufacturing area. The 128 Kishwaukee St. Site is located at similar distances to these sites, and the residential neighborhoods are located even closer. Among the most sensitive populations, pregnant women accounted for 5.71% of the female population in the Target Area versus 3.03% for the balance of the City and 2.4% State. There is a concentration of children in the Target Area, with a figure of 28.62% for children under 18 versus 25.31 % for the City and 22.97% State. Constance Lane Elementary School, with playground, recently opened in the center of the Target Area. This school is located just 5 blocks from both sites, and even closer to the active metal recycling center. Cleanup of the two sites within this proposal will further reduce potential threats to the health or welfare of these sensitive population.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions: Public Health impacts from various cumulative environmental issues; airborne pollution from the power plants and factories as well as the contaminated soil at the Brownfield sites are difficult to measure. However, the USEPA Environmental Justice EJSCREEN (2019 Version) provides health-related Environmental indicators that showed high health risks within the Target Area Census Tracts. Using the four Census Tracts comprising the Target Area, Indicators specific to this Target Area were obtained and evaluated. A percentile of 50 would indicate an average health risk compared to State or US averages. The following EJ Indexes are noteworthy: first, all 11 indexes for the Target Area showed scores of at least 74 percentile in the State and four are in the 90 to 100 percentile range; second, the EJ indexes that are 90% or more are Risk Management Plan (site count/distance) at 98 percentile, Hazardous Waste Proximity at 92 percentile, Traffic proximity and volume at 90 percentile and the Superfund Proximity Index at 98 percentile. Considering that the normal indices of a residential neighborhood on the northeast side of Rockford typically range from 18 to 45, the Environmental Justice Indicators in the Cleanup Grant Target Area indicate Excess Risk for that population. The EJ Screen Demographic Indexes include a 74% for Low Income Population, 65% for minority population and an overall Demographic Index of 69%. (EJSCREEN November 14, 2019, Census Tract 10-13). From the Environmental Justice standpoint, this Target Area is in serious need of addressing the Brownfields contributing to these health related issues demonstrated by EJSCREEN. Funding the cleanup of these two sites would facilitate the identification and reduction of asbestos, lead and carcinogenic PNAs from the sites and to the community members living nearby.

In addition to the soil, groundwater and air quality issues are associated with the industrial concentrations within the Target Area. This area has a very old housing stock and has the associated

lead based paint hazards that are endemic with older housing stock. 67% of the housing stock was built before 1950. The Illinois Department of Public Health, 2015 Annual Surveillance Report, identified 5 of the 28 Zip Codes within Winnebago County as Lead Risk Areas. Among those 5 zip codes is 61104, which includes the entire Target Area. In addition, Winnebago County Health Department Statistics for blood lead testing in children over the last 10 years show that zip code 61104 has the highest incidence of High Lead Levels in children in Winnebago County zip codes. For the initial Blood Test, 4.25% of the school-aged children had high lead levels. The retest showed a figure of 12.46%. Comparable figures for the primarily modern residential areas containing the 61107 and 61114 zip codes are 1.20% and 0.07% for the initial test and 5.5% and 0.47% for the retest (Winnebago County Health Department, 2007-2017 data). The high incidence of elevated lead levels among the children of the 61104 zip code that includes the entire Target Area, coupled with the socioeconomic and housing data, **clearly show that the Target Area is an area with environmental issues that have resulted in serious health disparities when compared to the City as a whole.** The lead paint issue is primarily linked to the deteriorating housing stock due to disinvestment by property owners.

(3) Disproportionately Impacted Populations: The Target Area demonstrates a sensitive population that is seriously impoverished and disproportionately impacted in several ways. There are several sensitive populations that are much more prevalent in this Target Area than in the City as a whole. Families below poverty level, female-headed families below poverty level, and pregnant women are all much higher than the City as a whole but also 2 - 3 times higher than the State of Illinois (State) figures. Families below poverty level is 40.26% compared to 17.8% for the City of Rockford and 9.8% State. Female-headed families below poverty level accounted for 58.83% of the female-headed families versus a figure of only 37.8% for the City and 28.4% State. In addition, there are several other indicators of the concentration of sensitive populations within the Target Area. Per capita income in the Target Area is about half that of the City, \$12,355 versus \$23,297, and almost a third of the State average of \$32,924. Minority Population in the Target Area is 67%. These demographics clearly demonstrate the concentration of sensitive populations. (US Census, American Community Survey, 2013-2017). It should be noted that this population has been impacted by an active industry. The prior referenced metals recycling facility was fined \$198,500 by USEPA for airborne lead emissions over seven days during 2016. (USEPA Civil Enforcement Case No. 05-2019-5011). This plant is centrally located in the Target Area.

The Target Area also has a much higher amount of crime than the City as a whole, accounting for 12.2% of the Group A Offenses, though the population is only 5.93% of the City total. Certain types of crimes are particularly troubling for the Target Area with murder/manslaughter making up 27.7% of the City total, kidnapping /abduction/rape at 17.9% of the City total, and prostitution-related offenses at 69.0 % of the City total. (City of Rockford Police Department, 2018 Report). The Target Area Demographics clearly show serious concentrations of poverty and economic distress across the board and a concentration of sensitive populations—children, female headed families in poverty and pregnant women. The high unemployment levels are a serious problem—the Target Area once had very large numbers of jobs in all sectors but now there are very few jobs in the Target Area with most manufacturing, services and retail now gone. Unemployment is estimated at 13% in the Target Area versus 6.6% for the rest of the City. Most of the manufacturing operations of the past within the Target Area are now vacant Brownfields, with 110 (11.3%) of Rockford's 970 total Brownfields located in the Target Area (2012 Rockford Metropolitan Agency for Planning Brownfield Inventory). Only 5.93% of the City's population is located here.

b. Community Engagement

i. Project Partners and ii. Project Partner Roles

Project Partner Name	Point of Contact	Specific Role in the Project
Midtown District Association	Ronn Mooney (815-997-5888)	Future site/planning process
River District Association	Gary Anderson (815-963-1900)	Future site/planning process
Haight Village Neighborhood	Lisa Jimenez (815-985-6376)	Future site/planning process
Orchid Neighborhood	Becky Lichty (815-985-6376)	Future site/planning process
Winnebago County Health Dept.	Todd Marshall (815-720-4118)	Public notification assistance

In addition to these community partners, a presentation will be made at the December 12 5th Ward Meeting. The 5th Ward includes a portion of the Target Area and it is also the focus of the recently awarded FY2020 Assessment Grant.

Each of the Project Partners will have two primary roles. First, they will assist the City and the Health Department to inform the Community about the nature and extent of the cleanup project and the timing of the project. The Health Department will also answer questions concerning health concerns. Second, except for the Health Department, the Project Partners will provide major input concerning the future uses at the two sites.

iii. Incorporating Community Input Rockford understands the importance of involving the community in Brownfield redevelopment and has been actively involved in the community in its Brownfield initiatives. City staff has presented an overview of the City’s intent to apply for the USEPA Brownfield Cleanup Grant and has provided status reports for all assessment and cleanup projects on a regular basis at Project Partner Meetings within the Target Area, including recent presentations at the Haight Village Neighborhood Association (Sept. 19, 2019), the Orchid Neighborhood Association (Nov. 26, 2019), the River District Association (Nov. 14, 2019) and the Midtown District Association (Jan. 14, 2020) . Once the Cleanup Grant has been announced, these meetings will be used as a venue to inform the Target Area of the cleanup process and schedule and review potential redevelopment projects, all while seeking their input on potential future uses. The City will also increase its efforts to use its website to inform the community of its Brownfield Assessment and Cleanup Projects and their status. City Staff also presented at a City Council Committee Meetings, most recently November 12, 2019 and conducted the Public Meeting on November 18, 2019. In addition, Spanish Speaking staff members will regularly verify the accuracy of the Spanish Translation of the Brownfields section of the City’s website.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

a. Proposed Cleanup Plan:

Site 1: 325 S. Madison St.: In response to the identified environmental issues within the building, the recommended Cleanup Plan is Alternative 1 of the “Analysis of Brownfield Alternatives” (See Attachment B). This Cleanup Alternative includes asbestos removal and disposal to take place according to USEPA standards. Site 2: 128 Kishwaukee St.: In response to identified environmental issues under and outside the structure, the recommended Cleanup Plan is Alternative 1 of the “Analysis of Brownfield Cleanup Alternatives” (See Attachment B). This Cleanup Alternative includes soil excavation within the footprint of the structure and to the south of the structure to remove lead and carcinogenic PNAs. This would take place as soon as the structure has been cleared, using other funding sources. Because of the structural condition, demolition of the structure will be required prior to soil excavation. The soil excavation and disposal will comply with USEPA standards.

b. Descriptions of Tasks/ Activities and Outputs

Task/Activity: Site 1: 325 S. Madison St. and Site 2: 128 Kishwaukee St.

- i. Project Implementation: Discussion of EPA –funded activities:
 - a. Task 1. Program Management: City staff will manage the Grant, procure and oversee contractors, submit quarterly progress reports, provide updates to ACRES/other program management.
 - b. Task 2. Site 1 Cleanup: A Qualified Environmental Professional will be procured to prepare the Quality Assurance Project Plan (QAPP), the final ABCA, bid specs for the asbestos removal project and provide Cleanup Oversight, air quality sampling and certify that the Cleanup is Complete. Cleanup Contractor Costs are the main component of this Task.
 - c. Task 3. Site 2 Cleanup: Similar to task 2 above, A Qualified Environmental Professional will prepare the QAPP, the final ABCA, bid specs for the soil cleanup and provide Cleanup Oversight. Cleanup Contractor Costs are the main component of this Task.
 - d. Task 4. Community Involvement: City staff will prepare the Community Involvement Plan for Administrative Record, conduct the Public Meeting and present/ gather at the Partner Meetings. Public input will be documented in the Administrative Record and Quarterly Reports.
- ii. Anticipated Project Schedule: As soon as the grant award is announced in June of 2020, the City will request permission to incur costs and, following approval, begin the procurement process for a Qualified Environmental Professional to perform the tasks identified in part i. a. above. The City would release bid specs for both Sites during September of 2020 and award the project to the appropriate contractor once the Cooperative Agreement has been received (anticipated October 1, 2020). The asbestos removal and soil disposal would take place during the fall of 2020 and be completed by early 2021.

iii. Task/Activity Lead: The lead entity with final oversight of each of the Activities identified above is Rob Wilhelmi, City of Rockford, Brownfield Redevelopment Specialist, CED Department.

iv. Outputs: 1) an approved Quality Assurance Project Plans for Sites 1 and 2; 2) approved Administrative Record document sets for each site; 3) an approved set of Bid Specs for each project; and 4) an approved Cleanup Completion Report for each site.

C. Cost Estimates: Development of Cost Estimates, Application of Cost Estimates and Eligibility of Cost Share Activities:

The cost estimates in the Budget Tables below were developed based on experience with six previous and one current Cleanup Grant for Task 1 Program Management, and Task 4 Community Involvement. Cost Estimates for Task 2, Site 1 Cleanup and Task 3, Site 2 Cleanup, were developed by Professional Environmental Engineering Firms. The Following provides detail for each of the Tasks: **Task 1. Program Management:** \$3,750 local match for each site, \$7,500 total. This would be an in-kind contribution. **Task 2. Site 1 Cleanup:** Asbestos Removal at 325 S. Madison: The estimated cost of the asbestos removal is \$196,103 as identified by Anderson Environmental in their report on February 20, 2015. (This firm had prepared the Asbestos Survey one month earlier). Professional /Technical Services provided by the Qualified Environmental Professional will perform technical services identified in Task 2. A Cleanup Contractor will be procured. \$200,000 in USEPA funds and \$30,000 in cost share, provided by the City’s Capital Improvement Program, has been budgeted for the asbestos removal. As part of the share, the City has procured an Engineering Firm to develop bid specs for the project using TIF funds. **Task 3. Site 2 Cleanup:** Soil excavation and disposal estimate is based on comparable size excavations performed at 815 S. Main Street, (BF-00E01078). Professional/ Technical Services will be provided by the Qualified Environmental Professional for technical services identified in Task 3. A Cleanup Contractor will be procured to perform soil cleanup. \$75,000 in USEPA funds and \$12,500 in cost share, provided by the City’s Capital Improvement Program, have been budgeted.

Task 4. Community Involvement: a total of 10 public meetings will be scheduled with the approximate cost of \$500.00 per meeting in the preparation of informational handouts and display boards.

c. Budget Table: Hazardous Substances Cleanups: Site 1 325 S. Madison and Site 2 128 Kishwaukee

Budget Categories	Task 1	Task 2	Task 3	Task 4	
Programmatic Cost	Program Management	Site 1 Cleanup	*Site 2 Cleanup	Community Involvement	Total
Contractual		\$200,000	75,000		\$275,000
Total USEPA		\$200,000	75,000		\$275,000
Cost Share	\$7,500	\$30,000	\$12,500	\$5,000	\$55,000
Total	\$7,500	\$230,000	\$87,500	\$5,000	\$330,000

*For Site 2, Asbestos Removal and Demolition (\$230,000 total,) are not included above. These tasks are to be funded by TIF funds and the Department of Defense’s Innovative Readiness Training Program. The City has applied for this program and based on communications, anticipates selection.

d. Measuring Environmental Results: The Project Manager will use Quarterly Reports and ACRES to track, measure and evaluate progress on each of these sites. In each case, the Output of Cleanup Completion will be documented as well as overall project results and progress towards the proposed outcomes of the redeveloped sites providing benefits to the Target Area. The Project Manager will implement corrective actions as needed.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability.

i. Organizational Structure and ii. Description of Key Staff: The City of Rockford has the necessary systems, process and procedures, both technical and financial, in place to successfully complete the Cleanup Grants. The Brownfields Program Management System in place at the City of Rockford consists of **Rob Wilhelmi**, Brownfields Redevelopment Specialist as well as support staff in the Community and Economic Development Department (CED), the Public Works Department and the Finance Department. Mr. Wilhelmi has 12 years of experience as a project manager for Brownfields consulting with Fehr-Graham and Associates before coming to the City of Rockford during 2015. Mr. Wilhelmi is in charge of Rockford’s Brownfield Redevelopment Programs. He manages the USEPA Brownfields Grants as well as the environmental consultants under contract with the City for the Brownfields Program. He prepares the Quarterly Reports for each grant, maintains the grant spreadsheets, reviews and approves the technical reports and invoices from the environmental consultants, coordinates with the City Administration and other Departments, and communicates with the Aldermen, and Project Partners within the Target Area. Mr. Wilhelmi has also managed code enforcement for the City for 4 years and has linked the code enforcement program and the brownfields initiative together to tackle blight and other issues plaguing our community. The CED support staff for the Brownfields Program is **Susan Diehl**, CED Fiscal Coordinator, coordinates regularly with Public Works and Finance on all financial matters. Susan has 12 years of experience in payroll, accounts payable and general office administration. She handles all payments to the environmental consulting firms under contract with the City of Rockford, and coordinates with **Michael Childers** of the Finance Department who performs the drawdowns from USEPA. Ms. Diehl also maintains and updates the Department Webpage, with the assistance of Rob Wilhelmi, including the Brownfields Section. It should be noted that the City’s Website is translated into over 40 languages to allow quick access to the Brownfield information by all community residents. The **Public Works Business Manager**, a position to be filled in early December 2019, will manage the accounting for Cleanup Grants. This position manages an average of \$20 million in local funds each year and oversees projects with as many as seven different funding sources. This position managed the

accounting for the \$24 million UW Health Sports Factory Brownfield Redevelopment Project, which included Funding from USEPA RLF and several other sources noted in b. below. This project, originally called Ingersoll, consisted of over three hundred individual pay items, of which 42 were eligible for USEPA RLF Funding.

iii Acquiring Additional Resources: The City anticipates procuring an environmental contractor(s) for Cleanup oversight and Cleanup Contractors for Building and Site Cleanup through its standard procurement process in conformance with USEPA requirements. In addition to contractors, the City will continue to provide in house grant management and reporting support of the project. As shown above, the City has an abundance of City Staff that can easily cover activities in the case of an absence.

b. Past Performance and Accomplishments:

i. Currently Has or Previously Received an EPA Brownfield Grant

(1) Accomplishments; Cleanup Grant for 134 North Main Street: Hazardous Substances CA BF 00E02306. This Grant is being implemented with the asbestos removal having taken place within the interior of the building during the fall of 2018. The removal of the roof asbestos layer is scheduled for the spring of 2020. The City will market this building once the asbestos cleanup is complete. The City will specify retail and office development for this building, which historically served as Rockford's original Walgreens Drug Store.

Supplemental Revolving Loan Fund: CA BF-00E45801. This fund has been the critical component in completing the Cleanup for two major Brownfield Redevelopment Projects, one of which is complete while the other is nearing completion. The Completed Project is the Redevelopment of the Ingersoll Industrial Site along the Rock River into the UW Health Sports Factory. This \$24-million-dollar project had its beginnings with Assessment Grants in 2007/08, then a \$200,000 Cleanup Grant BF-00E00320 and, finally, the Revolving Loan Fund. The funding package for the Redevelopment Project included \$9.19 million in State of Illinois Funds, \$1.46 million in USEPA Supplemental Revolving Loan Funds, \$1.96 million in City Capital Improvement Funds and a \$12.08 million dollar General Obligation Bond by the citizens of Rockford. The project nearing completion is the Embassy Suites Hotel, originally the Amerock Industrial Brownfield, a 13-story 220,000 square foot building that had been vacant for many years. After several years of preparing this building for redevelopment by acquiring and cleaning up surrounding Brownfields and the opening of the nearby UW Health Sports Factory the City was able to find a developer to initiate an \$80 million Brownfield Redevelopment to renovate this building into an Embassy Suites Hotel. This project is scheduled to be completed in April of 2020.

Hazardous Substances Assessment Grant CA BF-00E01527. The major accomplishments of this completed Assessment Grant were the following: 1) completion of six Phase I Environmental Site Assessments (ESAs); 2) City acquisition, to this point, of three of these sites; 3) Phase II ESAs at three of these sites; 4) extensive Phase II work at the 8 acre Colman Village Phase I site and 5) the preparation and submittal of the Remedial Action Plan for Colman Village. The Assessment work at Colman Village Phase I led to the approval of a Remedial Action Plan by the Illinois EPA.

(2) Compliance with Grant Requirements: The City of Rockford has kept all grants on schedule and in compliance with the Work Plan. All Quarterly Reports have been submitted on time. The City has a long history of over 13 years, from 2006 through 2019, with timely and acceptable Quarterly Reports, and there has always been at least one active grant during that time, sometimes as many as 5 active grants. The current open grants are the Cleanup Grant (BF00E02306), which started October 1, 2017, and ends September 30, 2020 and the Supplemental Revolving Loan Fund, which started in FY 2009 and will end at the close of FY2022 if there are no additional amendments to the Grant. The Cleanup Grant is expected to be completed during the third quarter of FY 2020 and closed out at the end of FY 2020. In addition, ACRES is regularly updated to reflect progress at each Brownfields site.

Attachment A

Threshold Criteria for Cleanup Grants

Site 1 – 325 South Madison Street (Rockford Watch Factory)

Site 2 – 128 Kishwaukee Street (Former Lloyd's Hearing)

1. Applicant Eligibility

The City of Rockford is a municipal corporation formed by the authority of the State of Illinois. Rockford is eligible to apply for Cleanup Grants from the USEPA.

2. Previously Awarded Cleanup Grants

The proposed sites have not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Site Ownership

The City of Rockford acquired the 325 South Madison Street property on July 17, 2014. The City acquired the 128 Kishwaukee Street property on December 20, 2016. Both sites were acquired upon completion of a Phase I ESA that complied with the All Appropriate Inquiry (AAI) Standard. The City of Rockford is the sole owner of both sites and has fee simple title to the property. If awarded a Cleanup Grant, the City will retain ownership of the sites for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of the sites.

4. Basic Site Information

Site 1

- (a) Name of the Site: Rockford Watch Factory Site
- (b) Address: 325 South Madison Street, Rockford, IL, 61104
- (c) Current Owner: The City of Rockford, Date of Ownership: Acquired on July 17, 2014

Site 2

- (a) Name of the Site: Former Lloyd's Hearing Building
- (b) Address: 128 Kishwaukee Street, Rockford, IL, 61104
- (c) Current Owner: The City of Rockford, Date of Ownership: Acquired on December 20, 2016

5. Status and History of Contamination at the Site

Site 1 - Rockford Watch Factory Site

- (a) Type of Contaminant: Hazardous Substances
- (b) Operational History and Current Uses: The Rockford Watch Factory was constructed in 1875-76 and served as a site for several manufacturing operations that utilized hazardous substances and office uses over the years. Offices have usually occupied the first floor. This

Building has been vacant the last several years, though there was a manufacturing operation more recently in one of the additions that was demolished in the fall of 2014.

- (c) Environmental Concerns: The environmental concerns for the 325 South Madison Street Building consist primarily of asbestos containing building materials and lead paint. An asbestos survey was completed in January 2015. This survey revealed that asbestos was of significant quantities within this structure and expected to cost \$200,000 to abate, not including Cleanup Oversight. Some exterior areas surrounding the building experienced limited soil cleaned up during 2015 using the USEPA Revolving Loan Funding (RLF).
- (d) Nature and Extent of the Contamination: This site became contaminated as a result of the historical building materials used to construct it, including asbestos containing building materials and lead paint. These materials were routinely used until the late 1970s. The asbestos containing building materials present at the site include floor tiles and mastic glue, window glazing, pipe mud and wrap, many of which have deteriorated into a friable state.

Site 2 - Former Lloyd's Hearing Building

- (a) Type of Contaminant: Hazardous Substances
- (b) Operational History and Current Uses: The Lloyd's Hearing Building was constructed in 1913 and initially served as a streetcar trolley storage and maintenance barn until the 1960s. It was then converted to an office building. This building has been vacant and deteriorating for approximately 13 years.
- (c) Environmental Concerns: The environmental concerns for the 128 Kishwaukee Street Building consist primarily of contaminated soils within the footprint of the building and to the immediate south. The Phase II ESA identified concentration of Polynuclear Aromatic Hydrocarbons (PNAs, a carcinogen) and lead at two locations. Soil excavation and disposal is necessary to address the detected contaminants. One location is within the footprint of the building while the second location is at an exterior area immediately south.
- (d) Nature and Extent of the Contamination: The subsurface soil beneath the building and on the exterior has been impacted most likely from the past use involving the maintenance and storage trolleys and busses. Heavy metals, including lead and carcinogenic PNAs are commonly detected at locations where maintenance of transportation related vehicles took place.

6. Brownfields Site Definition

- Neither Site 1 nor Site 2 is listed (or proposed for listing) on the National Priorities List.
- Neither Site 1 nor Site 2 is subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.

- Neither Site 1 nor Site 2 are subject to the jurisdiction, custody, or control of the U.S. government.

7. Environmental Assessment Required for Cleanup Proposals

Site 1 - Rockford Watch Factory Site

A Phase I ESA was completed on July 14, 2014. The Phase I ESA conformed with the ASTM E1527-13 Standard for All Appropriate Inquiry. An Asbestos Survey was conducted on January 27, 2015, by an Illinois Department of Public Health licensed asbestos inspector.

Site 2 - Former Lloyd's Hearing Building

A Phase I ESA was completed on this property on November 4, 2016. The Phase I ESA conformed with the ASTM E1527-13 Standard for All Appropriate Inquiry. An asbestos survey was performed by an Illinois Department of Public Health licensed asbestos inspector on December 21, 2016. An ASTM E1903-11 equivalent Phase II ESA focusing on soil and groundwater at exterior areas of the property was also completed on December 21, 2016.

8. Enforcement or Other Actions

The City is not aware of any ongoing or anticipated environmental enforcement or other actions related to Site 1 and Site 2.

9. Sites Requiring a Property-Specific Determination

Site 1 and Site 2 do not require a property-specific determination. Both have historically been deemed eligible for the use of USEPA Brownfields Assessment Grant Funds.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

(a) Property Ownership Eligibility-Hazardous Substances Sites

The City of Rockford purchased Site 1 (Rockford Watch Factory) on July 17, 2014, as a result of an effort to acquire valuable riverfront Brownfield sites to support its ongoing riverfront redevelopment initiative and restore public access. The remaining Rockford Watch factory building had several additions at the time of purchase that had significantly deteriorated and have since been removed. The previous owner was a private corporation that leased the building to a local hydraulic equipment manufacturer.

Site 2 (Lloyd's Hearing Building) was purchased by the City on December 20, 2016 for the purpose of acquiring downtown Brownfield sites with a high redevelopment potential. The City feels that cleaning up the site will make it more attractive for reuse and eliminate blight from our downtown district.

The City is currently the sole owner of both sites and has asserted itself an affirmative defense to CERCLA as a bona fide prospective purchaser as a result of the completion of All Appropriate Inquiry for both sites.

iii. LANDOWNER LIABILITY PROTECTIONS FROM CERCLA LIABILITY

1) **Bona Fide Prospective Purchaser Liability Protection**

- Both Site 1 and Site 2 were purchased after January 11, 2002. Site 1 was purchased on July 17, 2014 and Site 2 on December 20, 2016.
- A Phase I ESA was completed for Site 1 on July 14, 2014. A Phase I ESA was completed for Site 2 on November 4, 2016. Both Phase I ESAs conformed with the ASTM E1527-13 Standard for All Appropriate Inquiry.
- The City of Rockford is not liable in any way for contamination or affiliated with any other person potentially liable for the contamination at Site 1 and Site 2.
- All disposal of hazardous substances at Site 1 and Site 2 would have occurred before the dates they were acquired by the City.
- The City of Rockford will continue to exercise appropriate care by taking reasonable steps to address releases, including stopping continuing releases and preventing threatened future releases and exposures to hazardous substances at Site 1 and Site 2.
- The City of Rockford will continue to comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls associated with response actions at Site 1 and Site 2.
- The City of Rockford will provide full cooperation, assistance, and access to authorized persons at Site 1 and Site 2.
- The City of Rockford will continue to comply with any CERCLA information requests and administrative subpoenas, and provide all legally required notices with respect to the discovery or release of any hazardous substances found at Site 1 and Site 2.
- The City of Rockford will not impede performance of a response action or natural resource restoration at Site 1 and Site 2.

Demonstrate that the applicant meets the requirements for the BFPP CERCLA liability protection.

(a) **Information on Property Acquisition**

- i. **Acquired Ownership:** The City of Rockford acquired ownership of Site 1 by a negotiated purchase from a private corporation. Site 2 was also acquired by a negotiated purchase from the Winnebago County Tax Trustee.
- ii. **Date of Acquisition:** Site 1 was purchased on July 17, 2014 and Site 2 on December 20, 2016.

- iii. Type of Ownership: The City of Rockford has fee-simple title to Site 1 and Site 2.
- iv. Previous Owners: Site 1 was previously owned by DJNK Inc., 2833 Huffman Boulevard, Rockford, IL 61103. The Winnebago County Tax Trustee was the previous owner of Site 2.
- v. The City of Rockford had no familial, contractual, corporate or financial relationships with any prior owners or operators or potentially responsible parties of hazardous substance at Site 1 and Site 2.

(b) Pre-Purchase Inquiry

- i. Site 1 - The City of Rockford had an initial Phase I completed on January 11, 2013. The initial Phase I was then updated on March 26, 2013. After the one-year expiration date, a new Phase I ESA was completed on July 14, 2014, just prior to acquisition. The Phase I ESAs were performed in accordance with ATSM E1527-13 Standard for use by the City of Rockford.

Site 2 – The City of Rockford initiated a Phase I ESA, which was completed on November 4, 2016 in accordance with the ASTM E1527-13 Standard. The Phase I was completed for the specific use by the City of Rockford.

- ii. Who performed the PHASE 1 ESA: Fehr-Graham and Associates, a regional engineering and environmental science professional consulting firm completed the Phase I ESAs for Site 1 and Site 2.
- iii. The City of Rockford affirms that Phase I ESAs for Site 1 and Site 2 were completed within 180 days prior to acquisition of the property in order to take advantage of the bona fide prospective purchaser provision.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

Any disposal of hazardous substances that occurred at Site 1 and Site 2 would have been completed prior to ownership by the City of Rockford. The City has not caused or contributed to any release of hazardous substances at the site. The City has not arranged and will not arrange to have hazardous substances disposed of or transported to the site.

(d) Post-Acquisition Uses

There have been no post-acquisition uses of Site 1 or Site 2. The City has secured both buildings and has maintained the exterior areas until cleanup and redevelopment occur. The sites are monitored daily by the City's Public Works crews.

(e) Continuing Obligations

The City of Rockford has taken the following appropriate care with respect to hazardous substances found at Sites 1 and 2 by taking the following reasonable steps:

- i. For Site 1 and Site 2, the City has installed a controlled access system so that no unauthorized persons have access to the property. This controls any disturbances of the asbestos or lead-based paint or potential injuries from the deteriorated structure's interior and also any illegal activities that may occur at this vacant facility. The buildings at both sites have also been sealed to prevent the release of asbestos fibers to the outside ambient air.
- ii. The City has conducted Phase I ESAs in accordance with both the USEPA Brownfield program and the Illinois EPA Site Remediation Program to determine if there are any future concerns to human health and the environment at both Sites 1 and Sites 2. Subsequent Phase II ESAs and asbestos sampling has also been completed at both Sites to determine if contaminants are an imminent threat to human health or the environment. Removal of the hazardous substances in a timely manner is needed. This cleanup grant opportunity will facilitate the removal of asbestos and other hazardous substances identified at Site 1 and Site 2.
- iii. The buildings at both sites have been sealed to prevent the release of asbestos fibers to the outside ambient air and to prevent unauthorized access. Shallow soil contamination at Site 2 is inaccessible as there is a paved parking lot and concrete slab foundation that prevent exposure. Groundwater impacts have not been detected. The detected contaminants of concern have little to no volatilization risk that could present a vapor intrusion risk.

Commitments

- i. The City of Rockford will comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls;
- ii. The City will assist and cooperate with those performing the cleanup and provide access to the property;
- iii. The City will comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- iv. The City will provide all legally required notices.

11. Cleanup Authority and Oversight Structure

- a. Describe how you will Oversee the Cleanup of the Sites.

For Site 1 regarding Asbestos Removal, the City had two asbestos removal projects at other City-owned properties during 2014 - 2015 that were completed using US EPA RLF funding. The City will contract an Environmental Engineering Firm, such as Fehr-Graham, to produce abatement bid specs and oversee the asbestos removal at the structure. Fehr-Graham provided oversight for the asbestos removal at the Ingersoll Building and for the Additions to the original Rockford Watch Factory that were demolished.

For Contaminated Soil Removal at Site 2, the City will use an Environmental Engineering Firm, such as Fehr-Graham to oversee, soil cleanup and conduct confirmation sampling. The City had hired Fehr Graham during 2012 to oversee soil removal from the Tapco Building Site and during 2015 at the South Main Railyards Site. Those sites were enrolled in the State of Illinois Voluntary Site Remediation Program.

b. Access to Neighboring Properties.

Site 1: access to neighboring properties does not seem to be required because the City owns the adjacent parking lots and roadway surrounding the building. To the east of the building is Madison Street and to the west of the building is the Union Pacific rail line.

Site 2: an on-site parking lot surrounds this building to the north south and west. There is also a City-owned parking lot to the north, if additional staging space is needed. The property to the east contains a former church that is currently being demolished by a private developer.

12. Community Notification

The Draft Cleanup Grant and ABCA for Site 1, Rockford Watch Factory Building at 325 S. Madison Street, and Site 2, Former Lloyds Hearing Building at 128 Kishwaukee St., were made available to the public at two nearby Rockford Public Library sites near the Target Area and at City Hall. City Hall is located in the Target Area and just four blocks from Site 1 and one block from Site 2. These documents were also placed on the City's Website, which is available in over 40 languages through Google. The Public Meeting was conducted on November 18, 2019. A presentation of the Proposed Cleanup Grant was made at the Haight Village Neighborhood Meeting on September 19, 2019, the River District Association meeting November 14, 2019 and the Orchid Neighborhood meeting on November 26, 2019. Additional presentations will be made the 5th Ward meeting on December 12, 2019 and at the Midtown Districts meeting on January 14, 2019.

- A Copy of the Draft Alternative Brownfield Cleanup Analysis (ABCA) for the two Sites is included as **Attachment B**.
- A copy of the Community Notification Ad (Legal notice) and the comments received is attached as **Attachment C**.
- The November 18 Public Meeting Summary, including the presentation, attendance sheet, questions, comments and responses, is attached as **Attachment D**.

- The Community Outreach presentation for the five Project Partners is attached as **Attachment E**.

12. Statutory Cost Share

The City Council Resolution for Cost Share is **Attachment F**.

Attachment B: Community Notification: ABCA

**December 3, 2019 Draft
ANALYSIS OF BROWNFIELD CLEANUP
ALTERNATIVES**

**Cleanup Site 1: Rockford Watch Factory: Original Historic
Structure
325 South Madison Street: Asbestos Removal; and**

**Cleanup Site 2: 128 Kishwaukee Street (Former Lloyd's
Hearing Building Site) Soil Excavations**

Brownfields Cleanup Grant Application: FY2021 Program

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1.0 INTRODUCTION

City of Rockford

The City of Rockford is located in Winnebago County, Illinois with major routes of transportation including Interstates 39 and 90, along with US Route 20. Rockford has a population of approximately 151,283 residents according to the most recent American Community Survey and is the largest community in Winnebago County.

Cleanup Site 1: 325 S. Madison Street

The Rockford Watch Factory is located at 325 South Madison Street, with the west boundary of the property being the Union Pacific Rail line, the north boundary being the City-owned parking lot for the adjacent UW Health Sports Factory, the east boundary being Madison Street and the south boundary being the overflow parking for the UW Health Sports Factory.

This Analysis of Brownfield Cleanup Alternatives (ABCA) is provided to outline the two (2) alternatives evaluated at this final stage of the Cleanup Planning Process for the Original Rockford Watch Factory Structure, the only remaining structure, dating to 1875-76 construction. A preliminary asbestos survey and a Phase I Environmental Site Assessment were performed prior to City acquisition of this property and completed on July 14, 2014. Acquisition of the property was on

July 17, 2014. A Final Asbestos Survey was completed January 27, 2015 by Anderson Environmental. A cost estimate for the asbestos removal was prepared on February 20, 2015 and showed an estimated total cost of \$196,103.00.

This initial phase of the overall Watch Factory project had been asbestos removal from the building additions to the original Rockford Watch Factory structure prior to the demolition of those additions. That initial stage of the overall project was completed during 2015 using Supplemental USEPA Revolving Loan Funds. The second stage of the overall Watch Factory project was Site Cleanup of the 2.5-acre site surrounding the remaining original Watch Factory structure. This environmental cleanup work was completed using Supplemental USEPA RLF funds during 2015. This Proposed Cleanup Grant request is for asbestos removal from the original structure which is planned for rehabilitation after the asbestos removal is completed. No Supplemental Revolving Loan Funds are currently available for this Asbestos Cleanup project because all Hazardous Substance Supplemental Revolving Loan Funds as well as Program Income Funds are committed to the Colman Village Phase I Project.

Cleanup Site 2: 128 Kishwaukee Street

The 128 Kishwaukee Street building and property is located at the east edge of Downtown Rockford, with the west boundary being a City parking lot, the north

boundary being the Rockford Arts Council Building and City Parking Lot, the east boundary being the historic Midway Theatre Building and the south boundary being First Avenue. This property was acquired by the City of Rockford on December 20, 2016.

This Analysis of Brownfield Cleanup Alternatives (ABCA) is provided to outline the two (2) alternatives evaluated at this initial stage of the cleanup planning process for the former Lloyd's Hearing Building Site, which had originally been a streetcar maintenance and storage facility. A Phase I Environmental Site Assessment was performed prior to City acquisition of this property on December 20, 2016. The Phase II ESA revealed that Lead and PNAs, a carcinogen, "exceeded IEPA- regulated soil ingestion and soil component of groundwater ingestion exposure route objectives." This contamination was found to the south of the structure and within the eastern portion of the structure.

2.0 SITE BACKGROUND

CLEANUP Site #1: 325 S. Madison Street

The Rockford Watch Factory Original Structure was constructed in 1875-76 and has been designated an historic structure by the Illinois Historic Preservation

Agency. The Rockford Watch Factory Site had been purchased by the City of Rockford during the summer of 2014 with the intent of repurposing the original structure after removing the additions to the original structure and cleaning up the surrounding site. The future use of the original Rockford Watch Factory structure is retail and other uses that will complement the adjacent UW Health Sports Factory (Indoor Youth Sports Facility) as well as provide services and jobs for the surrounding community.

The Phase I Environmental Site Assessment for the Rockford Watch Factory site was performed during 2013 and the updated document was completed on July 14 of 2014.

Cleanup Site 2: 128 Kishwaukee St.

The Former Lloyd's Hearing site had been a streetcar and Interurban car maintenance and storage facility prior to the construction of the existing building in 1913. The 1913 building was constructed for the same uses, but later became a bus storage shed when streetcar use was phased out during the 1950's. During the 1960's, this structure was converted to office spaces but eventually was vacated. This structure has been vacant for over 10 years and is in very poor condition.

3.0 Cleanup Plan at Each Site

Cleanup Site 1: 325 S. Madison Street: Asbestos Removal

Asbestos Removal must be performed in this historic structure before the original structure can be repurposed. This asbestos removal should put this property in the position for reuse of the building for a use beneficial to the surrounding community and complementary to the adjacent UW Health Sports Factory.

Cleanup Site 2: 128 Kishwaukee Street: Soil Excavation.

The existing building will be removed using the Department of Defense Innovative Readiness Program. Asbestos Removal must be performed in the structure before the structure can be demolished, so both are included in the \$230,000 Innovative Readiness Program. The **Cleanup Grant** will address the soil contamination that consists of PNA and Lead Contamination that was found under the structure and to the south of the structure. The completion of the site cleanup should put this property in the position for reuse with new construction that would be beneficial to the surrounding community by producing jobs and providing services.

4.0 CLEANUP ALTERNATIVES

Cleanup Site 1: 325 S. Madison Street

There are two cleanup alternatives applicable to the Rockford Watch Factory, original structure:

4.1 Alternative 1 – Remove all asbestos from the remaining Original Rockford Watch Factory Structure

1. Effectiveness – this alternative addresses all of the remaining asbestos at one time.
2. Implementability – the only issues with implementing this alternative is available funding.
3. Cost – this action is expected to cost \$200,000 to \$250,000 or more because of the extent of the asbestos in the structure.

4.2 Alternative 2: No Asbestos Removal

1. Effectiveness – This alternative does not address the need to repurpose this historic building for a use that would be beneficial to the surrounding community.
2. Implementability – This alternative does not address the asbestos issue
3. Cost – There is no monetary cost but a considerable cost to the neighborhood to let this structure sit vacant and unusable

Cleanup Site 2: 128 Kishwaukee Street

4.3 Alternative 1 – Perform Soil Excavation and Disposal of the soil contaminated with lead and PNAs following demolition of the structure (using the Department of Defense Program).

1. Effectiveness – this alternative addresses all of the remaining environmental issues at one time.
2. Implementability – the only issue with implementing this alternative is available funding.

3. Cost – this action is expected to cost \$75,000 of USEPA Cleanup Grant Funds, following the \$230,000 Department of Defense Project that would remove the asbestos and demolish the deteriorated structure.

4.4 Alternative 2: No Soil Cleanup

1. Effectiveness – This alternative does not address the need to complete site cleanup to then provide a use that would be beneficial to the surrounding community.
2. Implementability – This alternative does not address the soil issue that is needed to make the site safe and developable.
3. Cost – There is no monetary cost but a considerable cost to the neighborhood to let this site sit vacant and unusable even after the investment to remove the dilapidated structure.

5.0 RECOMMENDATION

Cleanup Site 1: 325 S. Madison Street

Based on the analysis presented in the previous section, the first alternative addresses the contamination, but is also compatible with the proposed end use and is more cost-effective. Therefore, the first alternative is recommended.

Cleanup Site 2: 128 Kishwaukee Street

Based on the analysis presented in the previous section, the first alternative addresses the contamination and makes the site development ready, while fully utilizing both the Department of Defense and USEPA programs. Therefore, the first alternative is recommended.

6.0 DECISION DOCUMENT

A decision document will be issued at the close of the 30-day public comment period with additional details on the selected alternative.

Attachment C: Community Notification Ad and the Comments Received

Attached is the Official Certificate of Publication of the Community Notification AD, a copy of the Ad as it appeared in the Rockford Register Star on November 5, 2019 and a full size copy of the Community Notification Ad.

Only one comment was received, a letter from the River District in support of the application, which is the fourth page of this attachment.



Official Certificate of Publication as Required by State Law and IPA By-Laws

Certificate of the Publisher

Gatehouse Media certifies that it is the publisher of the Rockford Register Star. Rockford Register Star, a secular newspaper, has been continuously published daily for more than 50 weeks prior to the first publication of the attached notice, is published in the City Rockford, County of Winnebago, Township of Rockford, State of Illinois, is of general circulation throughout that county and surrounding area, and is a newspaper as defined by 715 ILCS 5/5.

A notice, a true copy of which is attached, was published 1 time in Rockford Register Star. The publication of the notice was made in the newspaper, dated and published on **November 5, 2019**. The notice was also placed on a statewide public notice website as required by 715 ILCS 5/2.1.

In witness, the Rockford Register Star has signed this certificate by Gatehouse Media, its publisher, at Rockford, Illinois, on **November 5, 2019**.

City of Rockford
Ad #RRS000259308

By:

Ashley Dillon
Legal Notice Representative
Rockford Register Star – Gatehouse Media

Publisher

(Note: Unless otherwise ordered, notarization of this document is **not** required.)
Ad attached

Notice of Public Meeting on November 18, 2019 at 4:00 PM, Rockford City Hall Council Chambers: Cleanup Grant Application to USEPA for the Cleanup of Two Brownfield Sites; Notice is hereby given that the City of Rockford will submit an Application to the U.S. Environmental Protection Agency (USEPA) for a Brownfields Cleanup Grant for the Rockford Watch Factory at 325 South Madison Street and the former Lloyd's Hearing Building Site at 128 Kishwaukee Street. A draft of the Cleanup Grant Applications will be available on the City of Rockford's website, <http://rockfordil.gov/>, under "Community and Economic Development Department"; "Long Range Planning"; "Brownfields" (on the right side of the page) and at the Rockford Public Library, Downtown and Montague Branch Library, starting November 4, 2019 and will be presented to the public at the Public Meeting on November 18, 2019 at 4:00 PM, Rockford City Hall Council Chambers, second floor. This grant proposal is due to the USEPA on DECEMBER 3, 2019. Please direct any comments on the City's intention to pursue grant funding from the USEPA or on the Draft Grant Applications to the Community Development Department, 425 East State St., Rockford, Illinois, 61104. Comments should be directed to Wayne Dust, 779-348-7415, e-mail wayne.dust@rockfordil.gov or Rob Wilhelm at 779-348-7425, e-mail robert.wilhelm@rockfordil.gov Written and verbal comments will be accepted until December 2, 2019 at 5:00pm.

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(Full size copy of Community Notification)



November 19, 2019

Wayne Dust, City Planner
425 E. State Street
Rockford, IL 61104

Dear Wayne,

We have been made aware of the City's request to file a USEPA Cleanup Grant Application for 2019.

The application is for 2 very important structures that need this assistance in order for developers to be interested in these sites for redevelopment.

As the Downtown Rockford business organization, the River District is fully supportive of the City of Rockford's application for these funds.

They include:

- \$200,000 cleanup grant for Asbestos Removal at the Watch Factory, 325 South Madison Street. The property is owned by the City of Rockford and is in a National Register Historic District. Its redevelopment is critical to the redevelopment efforts in the surrounding neighborhood. The cleanup would remove a serious impediment in attracting developers to the site.
- \$75,000 for soil cleanup of a former trolley barn and maintenance facility for a long defunct city-wide public transit trolley system at 128 Kishwaukee St. Its last owner was Lloyd's Hearing Aid Co. This site has been an eyesore for decades and is at the gateway to our downtown from the south on a major U.S. highway. This property is now owned by the City of Rockford.

We thank the City of Rockford for your efforts in making these properties more marketable.

Thank you,

Gary W. Anderson, River District

Attachment D: November 18, 2019 Public Meeting Summary

Attached please find the following items:

1. The Staff Presentation
2. The Attendance Sheet
3. Questions, Comments and Responses

December 2019 USEPA Cleanup Grant Application:

Previous Cleanup Grants have been Instrumental in Preparing Former Industrial Sites for Redevelopment such as the Ingersoll Site which is now the UW Health Sports Factory and the Tapco Site, now part of the Embassy Suites Project.

Proposed Cleanup Grant Application 2019:

- **Staff is proposing to apply for the following USEPA Cleanup Grant:**
- **\$200,000 for a Cleanup Grant for Asbestos Removal at 325 South Madison Street, the City-owned Rockford Watch Factory Building**
- **\$75,000 for Soil Cleanup for 128 Kishwaukee St. (former Lloyd's Hearing Building) Demolition to be performed using the Department of Defense Innovation Readiness Program**

PREREQUISITES: Each proposed site must be City-owned and have Phase I and Phase II Environmental Site Assessments Performed

Project Descriptions and Analysis of Brownfield Alternatives

Rockford Watch Factory Building

- **Cleanup Project: Asbestos Abatement**

- **Alternatives: None: Renovation and Repurposing of this building requires the Asbestos Abatement Project: Building is in need of extensive, costly exterior renovation. Building will continue to remain vacant if the overall renovation costs are not reduced. Asbestos removal helps bridge this gap.**
- **Benefit of the Cleanup Grant: Award of the Cleanup Grant would significantly reduce the amount of local incentives needed to renovate and repurpose this building to produce a complementary development to the adjacent UW Health Sports Factory, producing additional jobs and services for the area.**

128 Kishwaukee St. Building

- **Cleanup Project: Soil Excavation within the Building Foot Print, Soil Excavation outside the Building Footprint to the south of the Building**
- **Alternatives: None Anticipated because of the condition of the Building it does not appear safe to conduct soil excavation within the building footprint without demolition. This Demolition will be performed using the Department of Defense Innovation Readiness Program.**
- **Benefit of the Cleanup Grant: Award of the Cleanup Grant would enable the City to remove soil contamination and create a site for mixed-use development producing jobs and providing services for the area.**

Questions, Comments and Responses at the November 18 Public Meeting

Staff opened the meeting at 4:10 PM, and welcomed those in attendance.

Staff presented a summary of the Cleanup Grant Application and the Analysis of Brownfields Alternatives for the two sites. There were no questions concerning the presentation or the Cleanups to be performed at the sites.

Gary Anderson of Gary W. Anderson Architects , representing both the Haight Village Neighborhood Association and the River District Association, commented that he was in full support of the application and feels strongly about the need to position these sites for uses that would be beneficial to this area. The Rockford Watch Factory, in particular, would benefit from the Cleanup Grant by removing a major barrier to redevelopment. Developers tend to avoid the unknowns associated with older buildings, in particular environmental cleanup issues. The Cleanup Grant would be a major first step in the rehabilitation of this Historic Building. The 128 Kishwaukee Street site would benefit from this Cleanup Grant and make it much more attractive for new development.

Staff thanked Gary for his positive comments in favor of the Cleanup Grant Application and asked if there were any additional questions or comments.

Hearing none, Staff closed the Public Meeting at 4:25 PM.

Attachment E: Community Outreach Presentation

Display Boards used at the November 18 Public Meeting and Community Outreach Meetings

December 2019 USEPA Cleanup Grant Application:

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- **Benefit of the Cleanup Grant: Award of the Cleanup Grant would enable the City to remove soil contamination and**

**create a site for mixed-use development producing jobs
and providing services for the area.**

Attachment F: Statutory Cost Share

Attached please find the following documents:

1. The Staff Report to City Council concerning the Grant Application and requirement for the local match (cost share).
2. The City Council Resolution concerning the 20% local match and the source of the local match.



*Karl F. Franzen
Director
Community and Economic
Development Department*

Staff Report:

USEPA Brownfield Grants and Programs: Competitive Grant Process; FY 2021 Awards

Staff has received notice of the availability of several types of USEPA Grant Funds for Federal Fiscal Year 2021. These funds are available through a highly competitive grant application process. The grant applications are due December 3, 2019, and notices of successful grant applications are anticipated during the late spring of 2020 for this grant application round. This is a very competitive process, with only 10% of applications during the last 2 years receiving funding.

The City received one Cleanup Grant in 2017 and the \$300,000 Community- Wide Assessment Grant earlier this year. The City can only apply for a Cleanup Grant this year because it is now has these Assessment Funds. At this time, the City has a serious need for USEPA Cleanup Grant funding to prepare two City-owned properties for reuse, the Rockford Watch Factory and the 128 Kishwaukee St. site (former Lloyds Hearing.)

Staff is proposing to apply for a USEPA Cleanup Grant totaling \$275,000 that includes the City-owned Rockford Watch Factory Building at 325 S. Madison St. and the City-owned former Lloyd's Hearing Building Site at 128 Kishwaukee Street. These properties are eligible for this grant program because the Phase I and II Environmental Site Assessments have been completed. A local match of 20% is required for the Cleanup Grant if the City's application is successful. This would be \$55,000.

The USEPA Cleanup Grant program is an important component of the City's redevelopment efforts in and near the downtown as well as along our industrial and commercial corridors. The City has used Cleanup Grants to prepare the Ingersoll Site for the UW Health Sports Factory and the Tapco site for support parking for the Embassy Suites development at the former Amerock building and site, to mention two examples.

A Public Meeting is required by USEPA prior to the Grant Application submittal, and this has been scheduled for 4:00 on November 18, 2019. A Resolution authorizing this Cleanup Grant Application and the local match for the Cleanup Grant is also required by USEPA and is to be submitted with the Cleanup Grant Applications on December 18, 2019. The Draft Resolution is attached for your review and consideration at the November 12, 2019 ^{Finance} and Personnel Committee meeting and the November 18, 2019 City Council Meeting.

Please contact Wayne Dust at 779-348-7415, wayne.dust@rockfordil.gov or Rob Wilhelmi at 779-348-7425, robert.wilhelmi@rockfordil.gov if you have any questions.

RESOLUTION 2019-239-R

By: Alderman John Beck on behalf of the Finance and Personnel Committee:

WHEREAS, the City of Rockford (“City”) has been committed to the redevelopment of Brownfields sites for several years; and

WHEREAS, in partnership with the United States Environmental Protection Agency (“USEPA”) and the Illinois Environmental Protection Agency (“IEPA”), the City has been instrumental in several Brownfields Initiatives, most recently directed at the Environmental Assessment, Cleanup and Redevelopment of several Downtown, Riverfront, South Main Street and West State Street sites; and

WHEREAS, the USEPA Assessment and Cleanup Grant programs have been used for the environmental cleanup at Barber Colman, Ingersoll and, in conjunction with the IEPA River Edge Program at Tapco, and;

WHEREAS, the benefits of these USEPA programs are not only the cleanup of these Brownfield sites but also the development of community assets, especially the UW Health Sports Factory at the Ingersoll site and the Embassy Suites Hotel adjacent to the Tapco site; and

WHEREAS, the benefits of these USEPA programs include developments at a smaller scale though very important to the surrounding community such as the Save-A-Lot Grocery store on West State Street providing jobs and a retail grocery store for the area; and

WHEREAS, the Rockford Watch Factory Building at 325 South Madison Street, in Downtown Rockford, comprises a substantial Brownfield site and historic structure with environmental issues, specifically, asbestos containing materials, that need to be addressed prior to renovation and repurposing of this structure; and

WHEREAS, the 128 Kishwaukee Street Building and Site has environmental issues including asbestos and soil contamination that must be addressed prior to redevelopment; and

WHEREAS, the City is seeking a USEPA Brownfield Cleanup Grant to address these sites; and

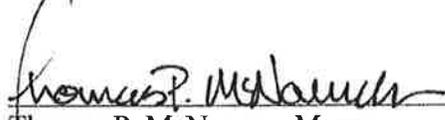
WHEREAS, there has been and will continue to be extensive community involvement in the selection of sites for environmental assessment and cleanup.

NOW THEREFORE BE IT RESOLVED, BY THE CITY COUNCIL OF THE CITY OF ROCKFORD, ILLINOIS:

1. The City of Rockford fully supports the United States Environmental Protection Agency Brownfield Cleanup Grant Program and recognizes the importance of the United States Environmental Protection Agency's assistance to compliment local investment in these Redevelopment efforts.
2. The City of Rockford authorizes staff of the Department of Community Development to make an application to the United States Environmental Protection Agency for the Brownfields Cleanup Grant Program for up to \$275,000 total Federal Share for the Cleanup Grant that includes the Rockford Watch Factory building and site at 325 South Madison Street and the site at 128 Kishwaukee Street. (The 20% local match of up to \$55,000 for this grant would be in the form of labor, material and other services provided by the City from other sources)

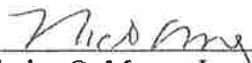
ADOPTED by the City Council of the City of Rockford, Illinois this 18th day of November, 2019.

APPROVED by the Mayor of the City of Rockford, Illinois this 20th day of November, 2019.



Thomas P. McNamara, Mayor
City of Rockford, Illinois

ATTEST:



Nicholas O. Meyer, Legal Director and
Ex Officio Keeper of the Records and Seal of the
City of Rockford, Illinois

Ayes: DURKEE, TUNEBERG, FROST, HERVEY, ERVINS, HOFFMAN, ROSE, BEACH, QUINONEZ,
MCNEELY, CHIARELLI

Nays:

Absent: GASPARINI, THOMPSON-KELLY, BECK