

## **Project Description: Cleanup Grant Application: Former Walgreens Building at 134 N. Main St.**

### **1. COMMUNITY NEED**

#### **a. Target Community and Brownfields**

##### Community and Target Area Descriptions

The City of Rockford, Illinois, a city of 152,871, was once a thriving manufacturing community with over forty percent of its workforce employed in manufacturing as recently as 1980. Since then, however, Rockford has faced decades of economic decline with manufacturing jobs generally being replaced by much lower paying service industry jobs. Currently, approximately 20% of the workforce is employed in manufacturing compared with xx in the State of Illinois and x for the US. This suggests that even further decline in manufacturing is likely to occur over time along with continued creation of Brownfields and declining neighborhoods surrounding the Brownfields.

Rockford was founded in 1837 and forms the central City in the Rockford Illinois Metropolitan Statistical Area. Early settlement and industry took place along the Rock River south of the current Downtown, where the 134 N. Main Street Building is located, with the industry using water power for the industrial processing that took place. This area, known as the Water Power District, was later served by the first railroad in the Rockford area now part the Union Pacific R.R. This rail line forms the southern border of Rockford's Downtown and is located just five blocks south of the 134. N. Main Street Building. Two additional railroads later served this Water Power District, and industry spread west and south from this railroad confluence to the South Main Rail Yards area. Further west on this line was the JI Case complex, now the City Yards, and further south the Barber Colman complex on another rail line. Industrial development spread along each rail line as it entered and left this rail confluence, resulting in a very complex pattern of industrial development along the rail lines that started during the 1850's and continued for approximately 100 years until modern industrial parks served by major highways began to dominate industrial development patterns. In areas where two or more rail lines served an area, there was usually a major industrial concentration. These early industrial developments now comprise the City of Rockford's major Brownfield concentrations that we now refer to as Brownfield Clusters. These rail-served industrial areas and their surrounding neighborhoods have largely been left behind as the Interstate Highway system serving the region is located at the eastern and southern perimeter of the Rockford and resulted in the creation of modern industrial parks near these major highways, several miles from the Brownfield Clusters.

The construction of Interstates 90 due east of the City during the 1950's as well as the US 20 Bypass due south of the City during the 1960s resulted in a dramatic shift of industrial development away from the central area and out to the industrial parks along these highways. These shifts in industrial activity and the jobs that went with this shift have all dealt serious blows to the vitality and viability of industry located in confined spaces along the rail corridors. These once-thriving industries are now vacant or underutilized and are often overlooked by the development community because of perceived or known environmental contamination or site constraints or both. Early Rockford industries, such as the production of farm machinery (JI Case), textile machines (Barber Colman), and furniture manufacturing all left the area over time. Most furniture manufacturers ceased operation during the 1930,s while JI Case closed its 30 acre plant in 1970 while Barber Colman closed its 15 acre plant in 1982. Other major manufacturers closed major plants during the 1980's including National Lock, Greenlee Brothers, and Amerock creating major brownfields.

The dramatic shift in industrial location was paralleled by a dramatic shift in the location of retail stores and professional offices initially in Downtown Rockford to shopping malls, strip centers and

office parks where larger tracts of land could be developed on major highways. Downtown Rockford, which had been bordered to the south, east and west by major industrial employment centers began losing those employment centers, starting during the 1950's, as new plants were constructed on larger outlying tracts of land and then in major industrial parks such as Eastrock, Northrock and Southrock each located 4 to 5 miles from Downtown. Because these manufacturing plants were originally located so close to Downtown, as they left so did a large clientele of workers who could easily shop or dine in Downtown Rockford during their lunch hour or after work.

An excellent example is the Amerock manufacturing company, a manufacturer of furniture hardware. This company operated out of a 13-story manufacturing facility at 400 S. Main Street, just 5 blocks from the 134 N. Main Street Building, from 1920 to the mid 1950's when a large single-story replacement factory was built on a large tract of land 3 miles from Downtown at 4000 Auburn Street. Over time the Downtown building was used for storage and eventually closed during the 1980's. (The manufacturing facility on Auburn Street closed in 2008). The former Amerock facility on South Main Street as well as several adjacent factories were all within walking distance of many of the Downtown retail stores including the Walgreens at 134 N. Main Street that operated at that location from 1934 to around 1970. It is no wonder that retail and office activity in Downtown Rockford which peaked in the 1950's and 1960's, has experienced a steady decline until recently when a limited number of investors have started to acquire these buildings for renovation. The supply of vacant Downtown Buildings, however, far exceeds the demand for the renovated space.

The City of Rockford's "Former Walgreens Building at 134 N. Main St." Site is located at 134 N. Main Street and lies within one of the eight Brownfield Clusters identified in the Community Wide Hazardous Substance Assessment Grant that the City received during 2015, the Downtown area, Brownfield Cluster 7. The Former Walgreens Building at 134 N. Main St. Site is located within Census Tract 29, one of the most economically distressed areas in Rockford. This tract is part of an eleven census tract area defined as the Targeted Community for this Cleanup Grant. This Targeted Community includes Census Tracts 10 through 13, 21, 25-26, 28-29 and 31-32.

Demographic Information and Indicators of Need

	<b>Target Community (11 Census Tracts)</b>	<b>Cleanup Site Census Tract 29</b>	<b>Rockford</b>	<b>Illinois</b>	<b>National</b>
Population:	28,343	1209	151,290	12,868,747	314,107,084 <sup>1</sup>
Unemployment:	28.0%	9.6%	9.8%	5.3%	5.0% <sup>2</sup>
Poverty Rate: All People	51.47%	41.2%	25.4%	14.1%	15.6% <sup>1</sup>
Percent Minority:	54.62%	41.2%	32.6 %	27.5%	37.2% <sup>1</sup>
Median Household Income:	\$19,956*	\$13,363	\$38,231	\$57,166	\$ 53,482 <sup>1</sup>
Never Finished HS	28.44%	17.00%	18.00%	12.4%	13.6% <sup>3</sup>
Population 14 and under, %	26.90%	4.38%	21.9%	19.59%	19.46%
Receiving Cash Public Assistance	7.81%	9.6%	4.2%	2.5%	2.8 %
Receiving Food Stamps, SNAP	51.49%	46.4%	23.4%	12.5%	13.0%

Per Capita Income	\$ 10,750	\$14,013	\$21,615	\$30,019	26,555
No Health Ins. Coverage	19.54%	18.8%	13.9 %	12.3%	14.2%
Below Poverty Level: All Families	49.39%	19.3%	21.0%	11.5%	10.5%
Below Pov. Level:Families w Female Householder, no Husband	74.64%	100%	45.1%	30.2%	30.9%
<p><sup>1</sup>Data in this row is from the 2014 American Community Survey data profile and are available on American Fact Finder at:  <a href="http://factfinder.census.gov/faces/tableservices/isf/pages/productview.xhtml?pid=ACS145YRDP05&amp;src=pt">http://factfinder.census.gov/faces/tableservices/isf/pages/productview.xhtml?pid=ACS145YRDP05&amp;src=pt</a>, and State, Rockford and Census Tract Tables</p> <p><sup>2</sup>Data in this row , except for the Target Community, is from the Illinois Monthly Labor Force Report, Illinois Department of Employment Securities, Report; Target Community Data is an estimate based on survey work within portions of the Targeted Community</p>					

Several pertinent indicators of the welfare and economic challenges within the Targeted Community are shown in the above table. First, it is important to note that these indicators are even more dramatic when compared to the State and National figures which are very close. Unemployment, poverty, percent minority and never finished high school are all 55% to 104 % higher than the City of Rockford as a whole **but 2, 3 or more times higher than the Illinois or National figures**. The poverty rate is the most striking at 95%higher than the City rate and 320% higher than the National rate. In addition, there are several other indicators of the concentration of sensitive populations within the Targeted Community. In the Targeted Community 19.71% of the households are single parent female households compared to only 12.26% in the City as a whole and 51.7% of the households have public assistance income during the past year compared to 25.7% in the City as a whole. There is also a concentration of children in the Targeted Community, with a 19.73% figure (15.02% City) for children under 10 and 7.63% (7.11% City) for children 10-14. The Targeted Community is also a predominantly renter-occupied area, with owner-occupied units accounting for only 31.76% of the occupied units compared to 56.07% in the City as a whole. The housing stock has a median year built of 1945 compared to 1960 for the City as a whole. Five of the twelve Census Tracts in the Targeted Community have a housing stock from 1939 or earlier. This is particularly important to consider because lead-based paint was not banned until the late 1970's. These demographics clearly demonstrate the concentration of sensitive populations living in very old rental units. (US Census, American Community Survey, 2009-2013).

Unfortunately, the Targeted Community has a much higher amount of crime than the City as a whole, accounting for 34.6% of the Group A Offenses though the population is only 21.1% of the City total. Certain types of crimes are particularly troubling for the Targeted Community with Weapon Law Violations accounting for 65.2% of the City total, drug/ narcotic violations accounting for 58.5% of the City total and prostitution accounting for 54 % of the City total.

One additional indicator of the need to focus on the Targeted Community is population gain or loss. Not surprisingly, the Targeted Community has experienced a major decline in population since 1970, declining from 47,412 in 1970 to 32,225 in 2010. This was a 32% drop in population during the time that the City of Rockford grew from 147,370 to 152, 871, a 3.7% increase. More importantly, the Targeted Community accounted for almost one third of the City's population in 1970 (32.2%) but only 21.1 % of the City's population in 2010. This is a direct result of the numerous plant closings during this period and the resulting major decline in jobs and business activity in the Targeted Community. It is not surprising that there was no major grocery store located within several miles of the Targeted Community for almost 25 years until the City of Rockford, with assistance from USEPA and HUD funding, developed a grocery store in 2004 on a former Brownfield site within the Targeted Community on South Main Street.

### Brownfields and Their Impacts

The Former Walgreens Building at 134 N. Main St. is located within the Downtown Brownfield Cluster which is one of eight Brownfield Clusters within the Targeted Community. Each of the Brownfield Clusters (BCs) located within the Targeted Community has a severe impact on the health, welfare and environment of adjacent residential neighborhoods within the Targeted Community. Based on the Phase I and Phase II Environmental Site Assessments that have been performed within this Targeted Community, these residents have potentially been exposed to a large number of health risks and environmental impacts due to more than one hundred and twenty years of industrial processes taking place at these Brownfield sites. The Former Walgreens Building at 134 N. Main St., though a commercial structure, is less than two blocks from a historic coal gasification plant that had operated prior to 1900. This site will be cleaned up by Commonwealth Edison in the near future, but this cleanup may require the demolition of the Rockford Public Library Building to accomplish this cleanup. In addition, Downtown Rockford has been ringed by industry within a five to six block radius for well over 100 years. Though much of this former industrial area is now Brownfields, some of this industry remains.

## **b. Welfare, Environmental and Public Health Impacts**

### Welfare Impacts

#### Cumulative Environmental Issues

For over 100 years, virtually all industry in Rockford was located within the Targeted Community within these eight Brownfield Clusters. In addition, there were coal-fired-power plants, coal gasification plants, active landfills all located within the Targeted Community. The Coal fired power Plants were located in Brownfield Cluster 2 and 7. The coal gasification plants were located in Brownfield Cluster 1 and 6. The Peoples Avenue Landfill is located in Brownfield Cluster 2.

It is important to note that the City of Rockford Public Water Supply System is the most extensive public water supply well system in the State of Illinois. Currently, the public water supply is provided by 29 wells nearly all of which are deep wells, 1400 feet or more. Several previously operating wells, a total of 13, have had to be shut down because of contamination, primarily VOC contamination. All of these closed City wells except one are located within the Targeted Community, the area of Rockford most impacted by Brownfield concentrations. One relatively new well, Well 37 (1985), had to be retrofitted with a water treatment system to remain operational because of VOC

contamination. This retrofit was at a cost of \$2.0 million dollars. Well 37 is located within the Targeted Community in proximity to Brownfield Cluster # 6.

The Targeted Community has a high percentage of minority and low income residents and a lack of proximity to jobs, a job “desert”, in an area where the residents once walked to work. Major areas have been determined to be “Food Deserts” by USDA. These factors coupled with the environmental issues ranging from air pollution to contaminated wells clearly identify environmental justice concerns. The City needs to have the resources to attack these Brownfields and produce jobs and services for the community such as the grocery stores and general merchandise.

### **Cumulative Public Health Impacts**

**\*Health disparities:** The cumulative effects 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 (EJVIEW) website, 2005 data, provides health indicators that showed higher health risks within the Targeted Community than in the City as a whole. Neurological Risk was at less than .1 per cent of the population for 41 of the 51 Census Tracts in the City of Rockford, but the Targeted Community had 8 of its 12 Census Tracts in the higher incidence range, .1 to .3 percent of the population within each tract. For Cancer Risk, 31 of the 51 City Census Tracts had a Cancer Risk of 30-50 per million. Of the 12 Census Tracts in the Targeted Community, 8 had a Cancer Risk in the 50-75 per million range and 3 of the remaining 4 Tracts had a Cancer Rate at the highest local level of 75-150 per million. Total Respiratory Risk was 2.5- 4 % for 45 of the 51 City Census Tracts. Six tracts had higher risk levels, and 5 of these 6 tracts are located within the Targeted Community. Three of these five tracts were at the 4-6% risk level and the other 2 tracts were at the 6-10% risk level.

In addition, Winnebago County Health Department Statistics for blood lead testing in children show that the Targeted Community has much higher lead levels than the City as a whole. In addition to the soil, groundwater and air quality issues associated with the industrial and transportation concentrations within the Targeted Community, this area has the oldest housing stock in the City of Rockford and the associated lead based paint hazards that are endemic with this housing stock. The average home is more than 70 years old. This data was gathered by Zip Codes and not available at the Census Tract level. This data shows higher incidences of elevated lead levels in the bloodstream for the US Postal Zip Codes that include the CW Targeted Community. Zip Codes 61101, 61102, 61103 and 61104 include the entire CW Targeted Community and showed 237 children or 4.5% of the 5,270 children initially tested had blood lead levels at 10 or more micrograms per deciliter. The County wide figures show that 290 of the 10,157 initially tested (2.9%) had high lead levels. If the four zip codes that include the CW Targeted Community are not included, the entire county excluding these four zip codes have an incidence in the initial test of only 1.1%, 53 out of 4887 tested. This year, further testing revealed that the Targeted Community accounted for 144 of the 161 children in Winnebago County found to have elevated lead levels, a very high 89.44 %. The Targeted Community accounts for only 12% of the total County population.

The high incidence of elevated lead levels among the children of this four Zip Code area that includes the entire Targeted Community, coupled with the higher rates of cancer, respiratory illness and neurological disorders coupled with the socioeconomic and housing data clearly show that the Targeted Community is an area with environmental issues, as well as an older housing stock where lead-based paint has not been abated, have resulted in serious health disparities for the Targeted Community when compared to the City as a whole. The lead-based paint issue is clearly linked to the deteriorating housing stock due to disinvestment by the property owners. This disinvestment in

the housing stock is symptomatic of an area impacted by Brownfields where property values are declining and there are few jobs and few services available. The data clearly shows that elevated lead-levels in children is far less prevalent in the areas outside the Targeted Community where housing is much newer and/or the lead-based paint has been addressed.

\*Threats to health and welfare of sensitive populations within the targeted community subject to environmental exposures The health risk indicators for Neurological Risk, Cancer Risk, and Respiratory Risk as well as lead levels in children verify the health disparities in the Targeted Community, the area most impacted and bearing a disproportionately high burden of environmental pollution compared to the City as a whole. The Demographic Information on pages 2 and 3 of this report clearly shows that the Targeted Community has a disproportionately higher percentage of sensitive populations than the City as a whole. Children under 10 years, children under 15 years, single parent female households, and minority populations are among the numerous indicators of sensitive populations that are at a disproportionately high level within the Targeted Community. As a result, the City has serious environmental justice concerns for the population of the Targeted Community. Even though some of the Brownfields in the Targeted Community have been cleaned up or have recently been funded (the 5 acre site at 715-815 S. Main St.) there is still a major need for cleanup. Clearly the Targeted Community and its sensitive population of young children demonstrate several health disparities that affect livability and quality of life in this area.

\*Cumulative Environmental issues and their impact on the Targeted Community

Many of these impacts are discussed above. One additional serious impact should be noted, issues with the City of Rockford Public Water Supply Wells. The City of Rockford currently operates 29 public water supply wells, mostly deep wells (1400-1500 feet). It is the largest public well system in the state of Illinois. In addition to the currently operating wells, 13 wells had to be abandoned due to VOC contamination. Of these 13 wells, 12 are located within the Targeted Community. 1 additional well located in the Targeted Community, had to be closed due to chromium contamination. Of the 29 operating wells, 2 wells have had GAC (Granulated Active Carbon) filtration systems installed. Both of these wells are also located within the Targeted Community.

\* Cleanup Actions at the Former Walgreens Building at 134 N. Main St. Site will be cleaned up in 2 stage process. This Cleanup Grant is for asbestos removal and lead based paint removal in this structure built in 1928. Since this structure was built at zero setback on all four sides, there are no site issues.

**c. Financial Need**

i Economic Conditions. Based on the demographics shown in the table on page 2 as well as those presented in the previous section, it is no coincidence that the Targeted Community demonstrates extremely high levels of economic need. Per capita income and poverty rates clearly document this financial need. All of the demographics verify that the Targeted Community is an economically disenfranchised area with a predominantly minority population. The combination of the concentration of Brownfields, lack of basic retail and other services, the aging housing stock and general lack of investment by the private sector have resulted in the precipitous decline of this Targeted Community which is reflected in both the concentration of poverty and minority populations as well as a severe decline in population. This trend will continue unless these Brownfields are assessed, cleaned and redeveloped. Clearly, there are environmental justice issues present in this Targeted Community and it would be a serious injustice if these Brownfields were not addressed by continuing assessment and cleanup programs.

## ii Economic Effects of Brownfields

Income and poverty level indicators on page 2 all show that the Targeted Community has an economically disadvantaged population with several economic indicators showing poverty and economic distress levels at up to two times or higher than the levels for the City as a whole. Income levels are considerably lower than the City as a whole, over 44% lower. (American Communities Survey 2006-2010). It is no coincidence that the Targeted Community demonstrates such high levels of economic need. Each of these socioeconomic indicators strongly shows an economically disadvantaged population that is disproportionately minority in composition. The combination of the concentration of Brownfields, lack of basic retail and other services, the aging housing stock, and general lack of investment by the private sector have resulted in a precipitous decline in the viability of these neighborhoods. During the past 30 years, building permit records show that there have been only a handful of new commercial developments within the entire Targeted Community that were not subsidized by the City in some way, such as TIF financing. In addition, these commercial developments that did take place, such as Aldi Foods and Walgreens are located on the periphery of the Targeted Community. Although this is largely due to the private sector generally avoiding economically distressed areas, the numerous Brownfield sites and their blighting influences are detrimental to private developers looking for suitable sites. (City of Rockford, Department of Community and Economic Development). In addition health risk indicators suggest cumulative environmental issues. These trends will continue unless these Brownfields are assessed, cleaned and redeveloped. The Assessment Grant Program proposed in this application would be a major step in the redevelopment of the Brownfield areas to productive uses including providing employment, retail goods and services, new housing, park and open spaces and offices.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **a. Project Description**

- i. Existing Conditions: The conditions at the Former Walgreens Building at 134 N. Main St. include asbestos and lead-based paint within this historic structure which was constructed in 1928. The recently completed asbestos and lead based paint survey has estimated total abatement removal costs to be close to \$200,000.
- ii. Proposed Cleanup Plan: In response to identified environmental issues within the structure, the recommended Cleanup Plan is Alternative 2 of the "Analysis of Brownfield Cleanup Alternatives" (included in the Attachments). This Cleanup Alternative includes asbestos and lead based paint removal at this time. Asbestos and lead-based paint removal is estimated to cost almost \$200,000.
- iii. Alignment with Revitalization Plans

### **b. Task Description and Budget Table**

#### Task Description

##### Task 1: Community Involvement

The objective of the Community Involvement task is to inform the City as a whole, and the community near the Former Walgreens Building at 134 N. Main St. Site, of the City's intent to conduct environmental cleanup activities and to provide timely details on cleanup plans and redevelopment efforts for the site. The City intends to rely primarily upon the following Community Outreach efforts: 1) Ward Meetings conducted within the Targeted Community by Alderman Tom Mc Namara on an as needed basis; 2) promotion of Planning and Development Committee and Finance and Personnel Committee Meetings of the City of Rockford, which are

open to the public, published in all the media, and reported upon by the media; 3) the City of Rockford website, and press releases , and the Public Hearing to be conducted during the b30-day Public Comment Period legal notices in the local newspapers; 4) regular meetings with the Brownfield Community Partners, and; 5) quarterly meetings with the Brownfield Redevelopment Advisory Committee. A Community Relations Plan will be prepared by Mr. Wayne Dust, the City of Rockford Brownfields Coordinator, who will oversee these efforts. A \$5,000 Cost Share amount from the City is budgeted for this task.

**Task 2: Cleanup Planning/ Action Plan/ Cleanup Bid Specifications/ RFP Process**

The Brownfields Coordinator is Wayne Dust, who has served as a Planning Administrator for 40 years and has over ten (10) years of Brownfields experience. Mr. Dust will use his extensive experience on past Brownfields Assessment and Cleanup programs to manage and oversee the activities that are necessary for the Former Walgreens Building at 134 N. Main St. Site prior to remediation. This includes the preparation of draft bid specifications for contractors in order to ensure that the appropriate tasks are completed and required regulations are followed. This also allows the City to obtain fair pricing and follow the appropriate procurement process. Mr. Dust will also prepare the Action Memo and the final ABCA. The \$10,000 budgeted for this Task is a City Cost Share of \$10,000.

**Task 3: Asbestos and Lead-Based Paint Removal and Disposal:** Based on the draft ABCA, asbestos removal will be required as documented in the ABCA. Total cost for asbestos and lead-based paint removal is almost \$200,000. \$190,000 of the Cleanup Grant funds are proposed for the asbestos removal and lead-based paint removal. Alternative funding will be provided to fund any gap, including the City Cost Share of \$15,000.

**Task 4: Professional Technical Services** This will include Cleanup Oversight of the Asbestos Removal and Soil Cleanup expected to cost \$20,000 total. The proposed funding is \$10,000 from the Cleanup Grant and \$10,000 City Cost Share.

Budget Table

Budget Categories	Project Tasks				Total
	Task 1	Task 2	Task 3	Task 4	
(programmatic costs only)	Community Involvement	Cleanup Planning / Action Plan	Asbestos Abatement* and disposal	Professional/ Technical Services	
Personnel					
Fringe Benefits					
Travel <sup>1</sup>					
Equipment <sup>2</sup>					
Supplies					
Contractual <sup>3</sup>			\$190,000*	\$10,000	\$200,000
Other (specify)					
<b>Total Federal</b>			\$190,000	\$10,000	\$200,000

<b>Cost Share</b>	\$5,000	\$10,000	\$15,000	\$10,000	\$40,000
<b>Total</b>	\$5,000	\$10,000	\$205,000	\$20,000	\$240,000
*The total cost of Task 3 is estimated at \$200, 000, including lead based paint removal and cleanup oversight.					
1 Travel to Brownfield-related training conferences is an acceptable use of these Grant Funds.					
2 USEPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies.					
3 Applicants must comply with the procurement procedures contained in 40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48					

**c. Ability to Leverage**

The Former Walgreens Building at 134 N. Main St. was purchased by the City of Rockford on February 15, 2013 after it had sat vacant and deteriorating for several years. The 134 N. Main Street Building is located in an area that includes several vacant 2-story structures including the largely vacant structure at 126 N. Church St and vacant structures at 214 N Church and 326 W. Jefferson. Each of these structures is located within two blocks of 134 N Main St and each of these buildings has been amended into the River North TIF District effective January 1, 2016, to facilitate financing for renovation and repurposing of these structures. The 134 N. Main Street Structure was also amended into the River North TIF District in an effort to maximize the potential for this structure. The renovation/repurposing of this structure will serve as a catalytic project in this area of Downtown which includes several other vacant buildings, in addition to those mentioned above, including the Times Theater and the original Pioneer Life Insurance building. The Pioneer building sits next to the Coronado Theater, an atmospheric theater that was renovated during the mid 1990’s at a cost of over \$18 million. This is an example of the severity of the challenges that Rockford faces in its Downtown.

Once asbestos and lead-based paint have been removed from 134 N. Main Street, the City will make every effort to ensure that this historic structure is renovated and repurposed in a timely manner in a way that complements the other potential building renovation projects in Downtown and provides a catalyst for those potential projects. The City will strive to provide retail and other services for the Targeted Community in these now vacant buildings.

**3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS**

**a. Engaging the Community**

- Plan for involving the Community in the Target Area and other stakeholders

Rockford understands the importance of involving the community in Brownfield redevelopment. The City of Rockford has been actively involved in the community in its Brownfield initiatives. Wayne Dust, local Brownfield Coordinator and Planning Administrator for the City of Rockford, has presented an overview of the City’s intent to apply for USEPA Brownfield Grants and has provided status reports for all assessment and cleanup projects on a regular basis at Public Hearings and Meetings just prior to City Council meetings.

In addition to the efforts in the Fifth Ward, the Brownfields Coordinator has worked with other Alderman whose wards have Brownfields issues including Tom McNamara(Third Ward) Ann

Thompson-Kelly (Seventh Ward) and Linda McNeely. (Thirteenth Ward). The Brownfields Advisory Committee (BRAC) will meet with these alderman and representatives from their respective wards at their regular Ward Meetings. Mr. Dust will also work with other Alderman which have Brownfields. The Ward Meetings conducted by these Aldermen will be used as one of the venues to inform these communities of these programs and identify potential redevelopment projects. It is important to note that neighborhood organizations, business organizations, lenders, realtors, developers, residents and property owners are regular participants at these Ward meetings. 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. Another form of public engagement that will be used will be workshops conducted throughout the Community in conjunction with the update of the City's Comprehensive Plan, the 2020 Plan. This Community outreach is currently ongoing.

Special efforts will be made Alderman Tom McNamara, Third Ward, in which the Former Walgreens Building at 134 N. Main St. is located. Alderman McNamara's Third Ward meetings have featured discussions on the status of the Former Walgreens Building at 134 N. Main St. as well as the adjacent Indoor Sports Facility at Ingersoll.

- Concerns of local residents with the proposed cleanup, including health, safety and community disruption directly affected by the site. Because this project at the Former Walgreens Building at 134 N. Main St. is specifically for Asbestos Removal, the City will require full compliance with all local, State and Federal Requirements regarding asbestos removal and disposal. Staff will work with Alderman McNamara to make sure that the residents in the surrounding area are aware of the exact timing of this asbestos removal and disposal.

- Cleanup activities and sensitive populations  
Health and environment: Special efforts will be made to inform the residents of the area as an extra precaution, to keep children away from the general area including the park across Madison Street during the project.

- Plan for communicating progress

\*Relevant Roles of Community Organizations: All community organizations will be kept informed of this project. Through Alderman McNamara and the City's Webpage, the progress on this project will be reported weekly.

**b. Partnerships with Government Agencies:**

Local and State Environmental and Health Agencies: Illinois EPA: the Illinois EPA Voluntary Site Remediation Program (VSRP) works in conjunction with USEPA Region 5 to provide Cleanup Oversight for all sites enrolled in the VSRP. Successful completion of a site Cleanup or demonstration, through Phase II ESA reporting, that no contamination exists will result in a No Further Remediation Letter. In Illinois, receiving this NFR letter is a prerequisite to Brownfield Redevelopment. As identified previously, the Illinois EPA has also awarded \$1million in Brownfields Cleanup funding as part of the River Edge Zone Program. This has created a major new opportunity to partner with IEPA on redevelopment projects that are planned for Brownfields sites requiring cleanups. The IEPA funds are severely restricted and do not include cleanup other than soil and groundwater. Combined with USEPA programs, however, the City will continue to tap into this valuable resource to accomplish the redevelopment of Brownfield sites. Mr. Dust frequently meets with Steve Colantino and Mike Charles at IEPA concerning this program and potential Cleanup projects.

The City is actively developing partnerships for Brownfield redevelopment projects at the local, state, and Federal levels. At the Federal Level, the US EDA recently selected the City of Rockford for the *Strong Cities, Strong Communities Initiative*. Under this initiative, two Federal employees have moved into offices in the City Hall to provide assistance to the City in seeking Federal Grants for economic development initiatives. At the local level, the City frequently partners with the Rockford Park District on Brownfield Redevelopment for parks and recreational facilities. The Rockford Park District is a separate regional taxing district with an elected governing board. The District has been a long term Community Partner with the City and has coordinated planning efforts for several decades. An important example is the recent Intergovernmental Agreement between the City of Rockford and the Rockford Park District concerning the funding and operation of the Downtown Sports Complex at Ingersoll, a \$24 million dollar project that includes \$1.1 million in USEPA RLF Funding.

The Rockford Metropolitan Agency for Planning (RMAP) is the Metropolitan Planning Organization for the Rockford Metropolitan Area under the supervision of the Federal Transportation Administration. In recent years, RMAP has partnered with the City of Rockford specifically in the development of a new Amtrak Station, proposed at the site of the previous station where service had been terminated in 1982. This Depot Site and the adjacent Lorden site were acquired by the City of Rockford in September of 2010 from the Canadian National Railroad. The City received USEPA Cleanup Grants for these two adjacent sites and will perform this Cleanup during the spring of 2015. Upon remediation of the Depot Site and Lorden Site, RMAP will channel funding commitments for the pre-construction phases of the Amtrak Station and will continue its efforts to secure funding for Amtrak Station construction.

**c. Partnerships with Community Organizations**

**Community Organization Description and Role**

The following is a summary table describing the Community Organizations that the City is partnering and their role in the planning and implementation of the City's redevelopment and repurposing of Brownfield sites:

Community Organization	Description of Community Partnership	Level of Commitment: Formal Agreements	Contact Person, Title Phone
Rockford Local Development Corporation RLDC	Loan Recipient for 3 major RLF projects, \$2 million total	Several Development Agreements, wide range of programs/projects	John Phelps, Executive Director, 815-987-8675
Neighborhood Network	Community Action Gardens in Targeted Area	City Human Services Department Funding	Cyndie Hall 815-967-4034
United Way, Rock River Valley	Will Partner with City on Job Creation in 2 neighborhoods	Inter-Agency Agreement with City being developed	Paul Logli, Executive Director 815-968-5400
Natural Land Institute	Riverfront Brownfields to restored naturalized areas	Agreement with City to be developed	Kerry Leigh 815-964-6666
Next Rockford	Assist with Redevelopment Strategies	Informal meetings with City; BRAC -formalize	Scott Anderson 815-904-2407
Rockford Housing Authority	Will Partner with City on Job Creation in 2 neighborhoods	Inter-Agency Agreement with City being developed	Ron Clewer Executive Director 815-489-8500
River District	Assist with site selection and prioritization	Currently informal but will consider formal	Gary Anderson 815-963-1900

Rockford Area Economic Council	Assist with finding users of vacant industrial sites	Part Funding from City ; refinements ongoing	815-9878129
-----------------------------------	---	---	-------------

Letters of Commitment

**Subawards to Community Organizations**

**d. Partnerships with Workforce Development Programs**

**4. PROJECT BENEFITS**

**a. Welfare, Environmental and Public Health Benefits**

**i. Health and/ or Welfare Benefits:** The Former Walgreens Building at 134 N. Main St. is located within Brownfield Cluster the Downtown. This site is located within 700 feet of the Rock River in north central Downtown. The Former Walgreens Building at 134 N. Main St. will be repurposed following asbestos and lead-based paint abatement and will be a catalytic project to this part of Downtown Rockford. The 134 N. Main Street project is very complimentary to the “Downtown Rockford Strategic Action Plan”, prepared by Farr and Associates, that includes job creation, retail, office and residential developments that include a focus on walking, non-motorized transportation, and in bad weather, public transportation, as the primary means of transportation to work or for recreation. The Downtown Rockford Strategic Action Plan also strongly recommends additional retail shops on key streets where there is already retail shops, but vacant space available. This focus on encouraging non- motorized transportation as part of this lifestyle promotes personal health and prevents pollution. There will be welfare and public health benefits as more downtown buildings are cleaned, environmentally, renovated and repurposed. Providing additional jobs, services and residential units will promote a healthier lifestyle. This healthy lifestyle will replace the air pollution, contaminated soil and groundwater impacts noted in the “Community Need” section at these locations and other sites as they are brought through the assessment, cleanup and repurposing process.

**ii. Environmental Benefits**

The City of Rockford has an exemplary record of following through with the redevelopment of Brownfields that were originally the site of environmental assessments performed using the USEPA Assessment Grant. There have been extensive environmental benefits as a result of these efforts that started with the assessment program, were continued with USEPA Cleanup Grants , USEPA RLF Program Funds ,State of Illinois Grants and General Obligation Bonds. Three interrelated projects recently have gone through this process and will be completed starting in 2016. These are the Indoor Sports Center at Ingersoll, the Downtown Hotel and Convention Center at Amerock and the Amtrak Station and support facilities at Tapco. These three projects total upwards of \$ 75 million in investment and they would not have been possible without the USEPA Cleanup Grants. These projects will have numerous health, welfare, employment and economic benefits. They are also providing considerable Environmental Benefits including the following: 1)reduction in emissions due to the encouragement of pedestrian movement between the three anchor projects (the “park once and walk” parking management technique is imperative); 2) removal of considerable contamination at two of the sites preventing further contamination from reaching the Rock River and 3) soil and groundwater cleanup and the establishment of engineered barriers to prevent exposure to people using the three facilities and the connecting routes. The 134 N Main Street Building fits into this picture because the renovated structure could provide complimentary uses to these three major developments that are within easy walking distance. In addition, the

successful renovation of this structure should be a catalyst to the renovation of the numerous vacant structures in north Central downtown. Once all of these structures are on line, collectively they would make a dramatic improvement to providing needed retail and other services, jobs and residential units.

## **b. Economic and Community Benefits**

### **i. Policies Planning or Other Tools**

The City of Rockford is committed to promoting sustainable development, especially mixed use development that encourages live, work and play environments which focus on non- motorized transportation. The Former Walgreens Building at 134 N. Main St., is a good example of infrastructure reuse of a vacant commercial structure. Brownfield Redevelopment is also a very effective tool in reversing sprawl, a significant problem that negatively impacted the City as documented in the City's 2020 Comprehensive Plan. The Former Walgreens Building at 134 N. Main St. will also be LEED Certified when it is repurposed.

ii. Integrating Equitable Development or Livability Principles: the creation of live, work and play environments though promoting mixed-use developments within Brownfield Redevelopment Strategies and Downtown Plans has already been noted previously. The City will strive to build on the momentum of the 134 N. Main Street building to promote the renovation and repurposing of the vacant buildings in this vicinity while numerous other major building renovation projects come on line. One is the Rockford Trust Building, one block from the 134 N Main Street Building and the Hanley Furniture Building which is three blocks away. The Trust and Hanley Buildings are planned to be renovated primarily into residential units, and the Trust Building is already in the process of being renovated. When all of these buildings large and small come on line, hopefully within 2 to three years, there will be upwards of 200 loft apartments within three blocks of the 134 N. Main Street Building. This will be a major positive change for Downtown and undoubtedly result in more goods and services being available Downtown.

### **Economic and Community Benefits (long-term benefits):**

i Economic or Other Benefits: This important goal will be accomplished by the City's efforts in the Brownfield Clusters, including Downtown. Without the City's concern for the redevelopment of Brownfields and the USEPA programs to assist with these redevelopment efforts, there is considerable evidence that Brownfield Clusters would simply expand and intensify over time as more and more industrial buildings approach the end of their useful life. Instead, many buildings and sites have been acquired by the City or other public or private entities that have been working with the City of Rockford towards the phased redevelopment of these areas. Each Brownfield Cluster has a different set of issues and different potential. The Downtown still has large industrial structures on its south and west edges, while the non-industrial structures have asbestos and lead based paint issues to address before they can be brought back online and provide mixed use developments providing jobs and services and residences. The City is confident that the renovation of the 134 N. Main Street Building will serve as a catalyst that will result in the renovation of nearby structures just as the development of the "UW Health Sports Factory" at Ingersoll has led to the proposed renovation/repurposing of the 13 story, 220,000 square foot Amerock Building as Hotel and Convention Center. There had been no interest in this Building before the Indoor Sports Center was announced. Now the City has a comprehensive Development Agreement with Gorman and Company for capital improvements and funding. Similar comprehensive plans are in place or being developed for the other parts of Downtown. All these plans replace obsolescent vacant and underutilized commercial structures with residences, retailers, offices, and public open space

amenities/ destination points, all of which contribute to the tax base directly or indirectly as these areas are revitalized. Each builds on the strengths of recent investment. All include retail services for the surrounding community and job creation. The City of Rockford, through its Tax Increment Financing (TIF) Districts has implemented a policy of increased funding by the City if the development agreement includes a requirement for new hires to be from within the community surrounding the TIF District. The Former Walgreens Building at 134 N. Main St. is soon to be located in the River North TIF District so the implementation of this policy will definitely occur.

ii. Job Creation Potential: Partnerships with Workforce Development Programs. The City of Rockford partners with the Workforce Connection, an Illinois workNetCenter whose partners also include several States of Illinois Departments and others. There is both potential for job creation during cleanup and during renovation of the structure. There is also job potential for retail and service uses following renovation of the structure.

## **5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Audit Findings:** There has been only one (1) minor adverse finding from the July 26, 2006 OMB Circular A-133 Audit performed by Mc Gladrey and Pullen for 2005, Finding 2005-7. This finding was concerning late reports. This issue was immediately addressed and there have been no adverse findings since that point in time.

**b. Programmatic Capability.** The Brownfields Program Management System in place at the City of Rockford consists of the Planning Administrator, Wayne Dust, and support staff in both the Community and Economic Development Department (CED) and the Finance Department. Wayne Dust is the designated Brownfields Coordinator by USEPA Region 5 since 2003. Mr. Dust has a Master's Degree in Geography from Kent State University and over 42 years of City Planning experience, 33 years of which have been with the City of Rockford. He is a member of the American Institute of Certified Planners (AICP). As the Brownfields Coordinator, he manages the USEPA Brownfields Grants as well as the environmental consultants under contract with the City for the Brownfields Program. Wayne prepares the Quarterly Reports for each grant, maintains the spreadsheets, reviews the technical reports and invoices prepared by the environmental consultants and cleanup contractors, coordinates with the City Administration and other Departments, and communicates with the Aldermen, BRAC and representatives of the Targeted Community.

The support staff in the CED for the Brownfields Program will be Susan Diehl and Terrance Hall. Ms. Diehl, Administrative Assistant to the CED Director, has a degree in Computer Science and 9 years of experience in payroll, accounts payable and general office administration. Ms. Diehl 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 CED Department Webpage including the Brownfields Section. It should be noted that the City's Website is translated into over 40 languages by Google, so the Hispanic Community has quick access to the Brownfield Information. Terrance Hall

The City has most recently had Fehr-Graham and Associates under contract to perform Cleanup Oversight in conjunction with two recently completed Cleanups: Cleanup of the Lorden/Eclipse and Depot sites (USEPA Cooperative Agreements BF00E01077 and BF00E01078) and for the Ingersoll Site Asbestos Removal and Engineered Barrier under the RLF Program (BF-00E45801). Please note that Fehr-Graham had performed the Phase I and Phase II Environmental Site Assessments for these sites and had prepared the approved Remedial Action Plans. In the event

that the City of Rockford receives this Cleanup Grant, the City of Rockford will secure the needed environmental services through the City's Procurement Process.

**c. Measuring Environmental Results: Anticipated Outputs/Outcomes**

**d. Past Performance and Accomplishments**

**i. Has Received USEPA Grants:** The City of Rockford recently received a Community-wide Hazardous Substance Assessment Grant for FY2016-19, BF-00E01527. The Revolving Loan Fund Grant received additional funding for FY 2017 and several new Cleanup projects have been potentially identified to use these funds. Two Cleanup Grants, BF-00E1077 and 78 were completed and closed out during the second quarter of FY 2016.

**1 Accomplishments** Accomplishments are summarized below for each of the grants:

Grant Description	Amount	Accomplishments : Assessments CA Number	Accomplishments : Cleanup CA Number	Redevelopment Project?/ NFR Letters
Cleanup Grant: Hazardous Subst. and Petroleum	\$200,000	CA BF-00E00320	Draft NFR Letter (5 acre site)	\$24 Million Indoor Sports Complex
Cleanup Grant: Hazardous Subst	\$200,000	CA BF-00E001079	1 No Further Remediation Letter (.6 acre site)	\$8 Million Amtrak Station Development. <sup>2</sup>
RLF Cleanup Grant: Petroleum	1,000,000	CA BF 00E45801-4	\$1,000,000 to Ingersoll "UW Health Sports Factory"	\$24 Million Indoor Sports Complex
RLF Cleanup Grant Hazardous Subst.	\$1,350,000	Same as above	\$700,000 to Tapco; \$450,000 to Ingersoll	\$24 Million Indoor Sports Complex
Assessment Grant: Hazardous Substances	\$200,000	CA BF -00E01527	Considerable assessment work performed at Barber Colman in advance of a major redevelopment .	

<sup>1</sup> Also included the demolition of two structures to complete soil and groundwater sampling

<sup>2</sup> The Indoor Sports Complex at Ingersoll is a \$24 million dollar project with a \$12 million general obligation bond from the City; it has opened and is now known as the UW Health Sports Factory Originally the Amtrak station was planned for another site but was moved to Tapco.

Other leveraged funds included the Illinois EPA River Edge Program, the Illinois DCEO River Edge Program and the USEPA Cleanup Grant (FY2013).

For each of the above Grants, additional details are provided below.

**CA BF -00E00320**—Cleanup Grant for the Ingersoll site: this 5 acre site was originally assessed using USEPA Assessment Grants from FY 2004 and FY 2006 with supplemental assessments performed by the Illinois EPA Office of Site Evaluations. The Cleanup included the removal of

petroleum free product from under the floor of the 80,000 square foot industrial structure as well as soil excavations at two hot spots. Because of this Cleanup Grant, the City was able to receive a Draft No Further Remediation Letter for this site.

CA BF- 00E00320—Cleanup Grant for the Tapco Site: this .6 acre site was occupied by the Tapco Building, a 120,000 square foot industrial building. This Cleanup Grant was used to perform soil excavations once the dilapidated structure had been removed. This site is now the future site of an Amtrak or Chicago Metra Station and it is located adjacent to the 240,000 square foot Amerock Building which is scheduled to be renovated into a hotel by 2018. The Tapco site has recently received a No Further Remediation Letter from the Illinois EPA.

CA BF-00E45801-5—Revolving Loan Fund This RLF Fund was used at the Ingersoll site and the Tapco site, as well as smaller expenditures at the Rockford Watch Factory Site and The Lorden-Eclipse Site. At the Ingersoll site, a total of \$1,450,000 was used to reestablish the Engineered Barrier and for asbestos removal. An 80,000 square –foot industrial building was repurposed and expanded to become the UW Health Sports Factory, an indoor sports facility for local youth sports during the week and for youth sports tournaments on the weekend. The total cost of this project was \$24 million, with \$12 million provided by a General Obligation Bond approved by the City of Rockford. This facility opened during June of 2016. A No Further Remediation Letter is being sought for this site.

For the Tapco site, nearly \$700,000 of Revolving Loan Funds was used to remove this structure prior to Cleanup of this site. As mentioned above, this site now has a No Further Remediation Letter from the Illinois EPA.

CA BF-00E01527 FY2016 Assessment Grant. This Assessment Grant has been used to perform Phase II Environmental Assessment Work at Barber Colman in advance of the development of a new campus for Rock Valley College, the local Community College, for training in manufacturing, aerospace and automotive technology. Other assessment work has been performed at the Comcast Building, a Downtown site that is adjacent to coal gasification site that will undergo a major cleanup by Commonwealth Edison

2. “Compliance with Grant Requirements” Each of the first four grants listed below has complied with Grant Requirements and has been closed out. Cooperative Agreement numbers are provided.

**Draft**  
**ANALYSIS OF BROWNFIELD CLEANUP**  
**ALTERNATIVES**

**Asbestos Removal**

**134 N. Main Street Building: Former Walgreens Building**  
**134 N. Main Street Building**

Brownfields Cleanup Grant Application

## TABLE OF CONTENTS

	<u>Page</u>
1.0 INTRODUCTION .....	3
2.0 SITE BACKGROUND .....	3
3.0 ASBESTOS REMOVAL <b>Error! Bookmark not defined.</b>	
4.0 CLEANUP ALTERNATIVES .....	4
4.1 Alternative 1 – No Action.....	4
4.2 Alternative 2 – Asbestos Removal Prior to Rehabilitation of the Structure .....	4
5.0 RECOMMENDATION .....	4
6.0 DECISION DOCUMENT .....	4

## **1.0 INTRODUCTION**

The 134 N. Main Street Building is located at 134 N. Main Street , with the west boundary of the property being a public alley, the north boundary being Mulberry Street, the east boundary being Main Street and the south boundary being an adjacent building. The City of Rockford is located in Winnebago County, Illinois with major routes of transportation including Interstates 39 and 90, along with Route 20. Rockford has a population of approximately 152,000 residents according to the most recent Census and is the largest community in Winnebago County.

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 134 N. Main Street property. A Phase I Environmental Site Assessment were performed prior to City acquisition of this property during the summer of 2013. An asbestos survey was performed during the summer of 2015. The initial phase of this project will be asbestos removal from the a the 134 N. Main Street Building structure prior to renovations and a three story verticle addition to the building. This Cleanup Grant request is for asbestos removal from the structure which is planned for rehabilitation/repurposing after the asbestos removal is completed.

## **2.0 SITE BACKGROUND**

The 134 N. Main Street Building was constructed in 1927 and has been designated an historic structure by the Illinois Historic Preservation Agency. The 134 N. Main Street Building had been purchased by the City of Rockford during the summer of 2013 with the intent of

repurposing the original structure for mixed uses. The future use of the property is proposed to be a 5-story hotel after the verticle addition is done to the current 2-story structure.

The Phase I Environmental Site Assessment for the 134 N. Main Street Building was performed during 2012 and the updated document was completed during 2013.

### **3.0 Asbestos Removal**

Asbestos Removal must be performed in the original structure before the original structure can be added on to with the 3-story verticle addition. This asbestos removal should put this property in the position for reuse of the building for a use beneficial to the surrounding Downtown community.

### **4.0 CLEANUP ALTERNATIVES**

There are two cleanup alternatives applicable to the 134 North Main Street Building:

#### **4.1 Alternative 1 – Remove all asbestos from the 134 N. Main Street Building 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 \$175,000- \$200,000 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

## **5.0 RECOMMENDATION**

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.

## **6.0 DECISION DOCUMENT**

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

7.0