Project Description: Cleanup Grant Application: Rockford Watch Factory Historic Structure

1. Community Need

a. Targeted Community and Brownfields

Targeted Community Description

The City of Rockford, Illinois, a city of 152,871, was once a thriving manufacturing community, but has since faced decades of economic decline. 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; 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. Two additional railroads later served this Water Power District, and industry spread west and south from the Water Power District railroad confluence to the South Main Rail Yards area, JI Case complex, the Barber Colman complex and beyond. Industrial development also 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. Generally speaking, in areas where two or more parallel rail lines served an area, there was usually an industrial concentration or industrial cluster. When a single rail line traversed the City, there was generally a narrow belt of industry along this line with spur lines that supplemented this pattern. These early industrial developments now comprise the City of Rockford's major Brownfield concentration that we now refer to as Brownfield Clusters. These rail-served industrial areas have been left behind as the Interstate Highway system serving the Rockford region is located at the eastern and southern perimeter of the City, 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 go 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. Early Rockford industries, such as the production of farm machinery (JI Case), textile machines (Barber Colman), and furniture manufacturing, Rockford National Furniture Company and others, all left the area over time. JI Case closed its 30 acre plant in 1970 while Barber Colman closed its 15 acre plant in 1982. Most Furniture Manufacturing Companies shut down during the Great Depression of the 1930's.

For several decades up through the 1950's, the industries in the Brownfield Clusters were part of a thriving "walk to work" community with thousands of workers and an extensive variety of retail establishments serving this workforce. With the major decline in these industries, at least partially due to antiquated industrial facilities, these Brownfields now contribute to crime and deterioration in the surrounding residential neighborhoods and form physical barriers to normal interaction between the neighborhoods. In many ways, Brownfields such as the Ingersoll/Watch Factory Area, within which the Rockford Watch Factory Site is located, form physical and psychological barriers between the adjacent neighborhoods to the south and east, and the Downtown Area which lies just west across the Rock River from this Brownfield. This division seriously impacts the welfare of our residents. It is the City's goal to assess and cleanup these Brownfield areas so they can be redeveloped with uses that complement the adjacent neighborhoods and draw them together by drawing workers and residents back to the redeveloped or repurposed Brownfield sites.

The City of Rockford "Rockford Watch Factory" Site is located at 325 South Main Street and lies within one of the eight Brownfield Clusters identified in the Community Wide Hazardous Substance Assessment Grant application submitted during December 2014, the Ingersoll /Watch Factory area, Brownfield Cluster 7. The City was successful with this Grant Application and will soon, after an environmental consultant is selected through the City's procurement process, be selecting sites to be assessed starting in early 2016.
The Rockford Watch Factory was constructed during 1875-1876 at 325 South Madison Street with the Chicago and Northwestern (now Union Pacific) spur line adjacent and at grade to the rear of the structure on an embankment to the west. The Rockford Watch Factory site slopes approximately 15 feet from Madison St. west to the UP rail line exposing the basement level of the Rockford Watch Factory building on the west side of the property. Three stories rise above the basement level and each level is approximately 5,000 square feet.

From the Union Pacific line to the west is another drop in elevation to the site of the former Ward Pump and W.F. and John Barnes factories (later Ingersoll Milling and Machine) along the Rock River. These factories had extended 1500 feet along the Rock River from Chestnut Street south to the Union Pacific Bridge over the Rock River and had been served by another rail line located in what is now Water Street. This had been a Milwaukee Road line that had extended from the main Milwaukee Road line approximately 2,000 feet to the south of Ingersoll and through the 20 acre Commonwealth Edison Power Plant site before arriving at the Ingersoll site through a tunnel under the main line of the Union Pacific. Today, the Ingersoll site will soon become the "UW Health Sports Factory, a 100,000 square foot Indoor Youth Sports Complex. This development includes renovating the 77,000 square feet north building of the Ingersoll complex and removing the smaller south building, replacing the south building with a Championship Court. Structure. The Rock River waterfront of approximately 1500 feet will be open to the public in the form of a riverfront pathway with observation decks over the Rock River.

It is important to note that the 20 acre Commonwealth Edison Site located just south of the Rockford Watch Factory and "Sports Factory" underwent environmental cleanup during 2015. This site had housed a large coal fired power plant, demolished in 1975, after being the site of a hydroelectric power plant from adjacent Fordham Dam. Following additional improvements to the site, this site will be opened to the public and provide access to the Milwaukee Road Bridge over the Rock River which is now owned by the City of Rockford and will soon provide a pedestrian bridge over the Rock River with views of the Fordham Dam, the Union Pacific Rail Road Bridge, the Sports Factory and other significant sites on both sides of the Rock River.

The Rockford Watch Factory site itself was, until recently, flanked by several large additions and a 4-story School District Administration building. These structures have all been removed, and the Rockford Watch Factory is now surrounded on the north and south by support parking for the Sports Factory.

The Rockford Watch Factory Site is located within Census Tract 10, one of the most economically distressed areas in Rockford, and this tract is part of a twelve census tract area defined as the "Targeted Community" for the approved Community Wide Hazardous Substance Assessment Grant as well as the Community-wide Petroleum Assessment Grant Application to be submitted. This Targeted Community is the area most impacted by the Brownfield concentrations or Clusters and it includes Census Tracts 10 through 13, 21, 25 through 29 and 31-32. Over 30 smaller

neighborhoods are included in the Targeted Community, many of which are flanked on two or more sides by Brownfield Clusters.

Demographic Information

	Target Community (12 Census Tracts)	Rockford	Illinois	National
Population:	32,062	152,138	12,848,554	311,536,594[1]
Unemployment:	20.0%	8.3%	5.3%	4.8%[2]
Poverty Rate:	49.8%	25.5%	14.1%	15.4%[1]
Percent Minority:	73.1%	43.2%	33.6%	36.7%[1]
Per Capita Income:	$10,943	$21,570	$29,666	$ 28,155[1]
Never Finished HS	29.67%	17.47%	12.7%	14.0%[3]

[1]Data in this row is from the 2009-2013 American Community Survey available at: http://www.census.gov/newsroom/releases
[2]Data in this row , except for the Target Community, is from the Illinois Monthly Labor Force Report, Illinois Department of Employment Securities, November 20, 2014 Report; Target Community Data is an estimate based on survey work within portions of the Targeted Community

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 441% 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 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.

Description of Brownfields

The Rockford Watch Factory is located within the Ingersoll/Watch Factory 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 Rockford Watch Factory is adjacent (across the Union Pacific Spur line to Loves Park) to the 5 acre former Ingersoll Milling Machine Property which had been W.F. and John Barnes Manufacturing and Ward Pump Manufacturing for several decades. The Ingersoll site is located on the Rock River as is the 20 acre Commonwealth Edison site which had been the site of a hydro-electric power plant and a large coal-fired power plant as well as a transformer storage yard. This area has had a concentration of industrial uses since the 1850s, initially using water power for industrial processing. The Rockford Watch Factory Site is located very close to the Union Pacific Rail Road main line to Chicago which has been there since 1858 and adjacent to the branch line to the northeast. These rail lines as well as two additional rail lines that cross the Rock River, a short distance to the south, have resulted in an industrial concentration initially along the Rock River and subsequently spreading outward along these rail lines during the late 1800's and early 1900's. As a result there was a considerable industrial density within a quarter mile of the Rockford Watch Factory which was, until recently, a dense Brownfield area.

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 5. 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 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 many 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.

b. Impacts on Targeted Community

*Impacts of Brownfields on Public Health or Welfare; 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, .1to .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 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. 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. 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 to sensitive groups within the targeted community potentially 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.

*How Cumulative Environmental and/or Brownfields Issues have Disproportionately Impacted 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. I additional well located in the Targeted Community, had to be closed due to chromium contamination. Of the 29 operating wells of the City system, 2 wells have had GAC (Granulated Active Carbon) filtration systems installed. Both of these wells are located within the Targeted Community.

*How the Watch Factory Adversely impacts the Targeted Community at the present time. This Cleanup Grant is for asbestos removal in the original structure. This is stage 2 of the overall project, with stage 1 being asbestos removal from the additions to the original structure that took place last winter. The third stage of the project is proposed to be funded by USEPA Revolving Loan and/or Illinois EPA Grant funds and includes soil and potentially groundwater cleanup. Several hazardous substance contaminants are suspected in the soil of this 2.5 acre site, so there is potential for exposure to people using this site. It should also be noted that this site is across the street from a public park, to the east, and the UW Health Sports Factory under development to the west.

c. Financial Need

i. Economic Conditions: Based on the demographics shown in the table above 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. The Rockford Watch Factory Site is the next priority for environmental cleanup.

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 2009-2013).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 Cleanup Grant 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 Rockford Watch Factory Site include asbestos and lead-based paint within the historic Watch Factory structure. The asbestos survey has estimated asbestos removal costs to be over $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 removal at this time. Asbestos removal is estimated to cost over $200,000. In addition to this Cleanup Grant, the City will be seeking to program USEPA RLF funding, if needed, for lead-based paint and other environmental issues that may remain, such as soil and groundwater cleanup.

b. Task Descriptions 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 Rockford Watch Factory 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 McNamara on an as needed basis; 2) Staff Reports to the 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 including the City Web Site, and reported upon by the news media; 3) the City of Rockford website "Brownfield Status" ,part of the Department of Community and Economic Development page, and press releases and 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 (11) 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 Rockford Watch Factory 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 Removal and Disposal: Based on the draft ABCA, asbestos removal will be required as documented in the Asbestos Survey. Total cost for asbestos removal is estimated at over $200,000. $190,000 of the Cleanup Grant funds are proposed for the asbestos 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**				
	Task 1	Task 2	Task 3	Task 4	**Total**
(programmatic costs only)	Community Involvement	Cleanup Planning / Action Plan	Asbestos Abatement* and disposal	Professional/ Technical Services	
Personnel					
Fringe Benefits					
Travel[1]					
Equipment[2]					
Supplies					
Contractual[3]			$190,000*	$10,000	$200,000
Other (specify)					
Total Federal			$190,000	$10,000	$200,000
Cost Share	$5,000	$10,000	$15,000	$10,000	$40,000
Total	$5,000	$10,000	$205,000	$20,000	$240,000
*The total cost of Task 3 is estimated at over $200,000. Alternative funding from the USEPA Supplemental RLF Program may be sought for the completion of Task 3.					
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 include the cost share in the budget even if applying for a waiver.	

c. **Ability to Leverage**

The Rockford Watch Factory is adjacent to and considered ancillary for the $24 million UW Health Sports Factory currently 70% complete. The Sports Factory is closely tied to the redevelopment of Amerock into the Downtown Motel and Convention Center. The future Amtrak Station is closely tied to the other projects and will be adjacent to the Hotel and Convention Center. The City recognizes that it may need additional funding to complete the asbestos removal at the Watch Factory Building. The City will use Supplemental Revolving Loan Funds, if needed. Once asbestos has been removed, the City will make sure that this historic structure is repurposed in a timely manner in a way that complements the other projects, especially the Sports Factory. Responses to a nationwide RFP for the Renovation of the Rockford Watch Factory are due January 12, 2016, and the City is determined to have the selected developer start work on the exterior of the building by March 1 with asbestos removal to take place following approval of this grant.

Because the Watch Factory is a component of one of three interrelated major Brownfield Redevelopments, the City of Rockford will apply for Supplemental Revolving Loan Funding. This funding will enable the City to perform soil and groundwater cleanups at sites identified and prioritized through this Assessment Grant Program. In addition, the City has received funding and funding commitments from Illinois Department of Commerce and Economic Opportunity for improvements to Davis Park, the $24 million UW Health Sports Factory and the $60 million Downtown Hotel and Convention Center. The City has approved a General Obligation Bond of over $12 million for the Sports Factory. Capital Improvements and TIF funding of over $10 million has been approved to assist in the Downtown Hotel and Convention Center Projects. Funding Commitment documents are attached.

3. <u>Community Engagement and Partnerships</u>

a. **Plan for Involving the Targeted Community and other Stakeholders; and Communicating Project Progress:**

- Plan for involving the Targeted Community& 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 and Council Committee meetings. He has also presented on a regular basis at the Fifth Ward meetings at the Montague Branch Library throughout the last five years and at Public Meetings just prior to City Council or City Council Committee meetings. It is important to note that the City of Rockford increased the Transparency of its decision- making process starting in January of 2015 with the following major enhancements: 1) all staff reports to be presented to the Council or Committee are posted on the City's website on the Thursday prior to City Council or Committee meeting and 2) all Council Committee meetings as well as City Council Meetings are conducted in City Council Chambers and Broadcast Live on the local cable channel.

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 with Alderman Tom McNamara, Third Ward Alderman, in which the Rockford Watch Factory is located. Alderman McNamara's Third Ward meetings have featured discussions on the status of the Rockford Watch Factory as well as the adjacent UW Health Sports Factory at Ingersoll. These meetings will continue.

- Concerns of Local residents regarding proposed cleanup activities. Because this project at the Rockford Watch Factory 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.

- Protective of Sensitive Populations and Nearby Residents: 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.

- Communicating Progress: 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.

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 had 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 UW Health Sports Factory at Ingersoll, a $24 million dollar project that includes $1.5 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 has now completed this Cleanup. At the current time the Amtrak service project is on hold. RMAP will continue its efforts to secure funding for future Amtrak Station construction.

c. Partnerships **with Community Organizations**

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	Subsidiary is 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 Community	City Human Services Department Funding through Annual Budget	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
Transform Rockford	Partner with Redevelopment Strategies	Informal meetings with City admin. and staff	Patrick O'Keefe 815-977-5840
Rockford Housing Authority	Will Partner with City on Job Creation in 2 neighborhoods	Inter-Agency Agreement with City for Police	Ron Clewer Executive Director 815-489-8500
River District	Assist with site selection and prioritization	Annual Funding for Staff Assistance by City	Gary Anderson 815-963-1900
Economic Development District of Northern Illinois	Partner with City on ED strategies, Brownfield site selection	Funding pass through from RAEDC	Dana Northcott, Executive Director 815-969-4252
Rockford Area Economic Development Council (RAEDC)	Assist with finding users for redevelopment of vacant industrial sites	Major Funding from City's Annual Budget; refinements ongoing	Mike Nichols, President 815-987-8129

i) Letters of Commitment are attached from each of the Community Organizations listed above.

4. Project Benefits

a. Health and/or Welfare and Environmental Benefits

i. Health and/ or Welfare Benefits: The Rockford Watch Factory is located within Brownfield Cluster 7, The Ingersoll /Watch Factory area. This site is located within 300 feet of the Rock River and at the south edge of Downtown. The Rockford Watch Factory will be repurposed following asbestos abatement and will be a complimentary use to the adjacent UW Health Sports Factory, 70% complete, at Ingersoll. In addition, the City and Rockford Park District plan for a continuous system of Greenways/Pathways along the Rock River includes linking with the major regional pathway system, the Grand Illinois Trail System. The Ingersoll/ Watch Factory area has redevelopment plan that include job creation or major commercial 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. This focus on encouraging non- motorized transportation as part of this lifestyle promotes personal health and prevents pollution. In addition, the Greenways Plan includes converting one of the three (3) railroad trestles across the Rock River to a pedestrian bridge linking the recreation paths on either side of the river. The City of Rockford now has ownership of this bridge and, during 2016, this bridge will be open to pedestrians. There will be welfare and public health benefits as the environmental assessments are taken to the site cleanup stages and beyond, both from the safe removal of the hazardous substances as these Brownfields are cleaned up and from the standpoint that the open space components and pathway extensions incorporated into the redevelopment plans will promote a healthier lifestyle. Children will soon be able to play in new parks that are currently Brownfields. 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 .It is important to note that the UW Health Sports Factory at Ingersoll and the Downtown Motel and Convention Center at Amerock are being interconnected with pedestrian improvements including widening the pedestrian walkway across the Chestnut Street Bridge, a walking distance of two blocks. In addition, the former Milwaukee Road Railroad Bridge across the Rock River will be converted to pedestrian use during 2016. This will provide an alternative 4-block scenic route from the Downtown Hotel to the UW Health Sports Factory with views of the other two rail bridges, the Fordham Dam and the original Ford of the Rock River from which Rockford was named. The Rockford Watch Factory, once repurposed, will be a part of or ancillary to the Sports Factory.

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. Two interrelated projects recently have gone through this process and will be completed during the 2016-2018 time framework. These are the UW Health Sports Factory at Ingersoll and the Downtown Hotel and Convention Center at Amerock. These two projects total upwards of $ 85 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. Item 2 is particularly noteworthy because the City of Rockford has a particular incentive to improve the water quality in the Rock River because it has become a

year–round habitat for a local Bald Eagle population which has been increasing over time. The Rock River just below the Fordham Dam is a major feeding grounds for the local Bald Eagle population, many of which roost along the Rock River to the south of the dam. Some of these roosting sites are Brownfields, such as Barber Colman.

b. Environmental Benefits from Infrastructure Reuse/ Sustainable Reuse

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 UW Health Sports Factory at Ingersoll, adjacent to the Rockford Watch Factory, is a good example of infrastructure reuse of a large vacant industrial structure that will not only soon be an indoor sports complex for local youth, but also be a LEED Certified Building combining energy efficiency and reduction in emissions. The Cleanup of the site has already prevented petroleum product from entering the adjacent Rock River and eliminated exposure routes from contaminated soil. Another major component of the infrastructure reuse at Ingersoll will be a walkway along the Rock River, which is an important part of the local infrastructure (State right-of-way). Although Ingersoll is a good example, all proposed redevelopments within the Targeted Brownfield Clusters will incorporate the following infrastructure reuse/sustainable reuse measures: 1) LEED Certified Buildings (either new construction or adaptive reuse), 2) restoration of native landscaping and 3) storm water management and reuse innovations, especially the ability to incorporate surface water quality improvements. Brownfield Redevelopment is also a very effective tool in reversing sprawl, a significant problem that has negatively impacted the City as documented in the City's 2020 Comprehensive Plan. The Rockford Watch Factory 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 has already been noted previously. One particularly good example here is the proposed redevelopment of the Amerock Building, Ingersoll Building and Tapco site. When these 3 developments are completed in 2016-18, the City will have a major Indoor Sports Complex and a major Downtown Hotel all within walking distance. The Tapco site will be developed as an ancillary use to the Downtown Hotel and future Amtrak station. These developments will be interconnected by two pedestrian links across the Rock River. There will be numerous loft apartments, currently being renovated, coming on-line within two or three blocks of these sites. It should also be noted that the City frequently enacts site specific groundwater use ordinances, recycles demolition materials for reuse, and explores green remediation ordinances and policies.

c. 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. 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 partners all working towards the phased redevelopment of these areas. Each Brownfield Cluster has a different potential. The Ingersoll /Watch Factory Cluster , where the Rockford Watch Factory is located, has major potential for development complimentary to the Sports Factory on nearby Brownfields. Enhanced property values and job creation due to increased tourism activity, restaurants, and other retailers would occur as these complimentary uses are developed. A nearby Brownfield site, the 13 story, 220,000 square foot City-owned Amerock Building will become a Hotel and Convention Center. There was no interest in this

Building before the Sports Factory facility 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 at several of the Brownfield Clusters. All these plans replace Brownfield properties 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. 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 Rockford Watch Factory is located within the East River 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. 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 41 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 David Sydney and Susan Diehl. Susan Diehl, Administrative Assistant to the CED Director, has a degree in Computer Science and 8 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. David Sydney has a Master's Degree in Planning from the University of Illinois and had 6 years of experience in Planning and Design in the private sector before coming to the City in August of 2013. David will assist with planning and design of Brownfield sites including adaptive reuse of structures on these sites. He is currently facilitating redevelopment planning efforts at the former Tapco Site and at the adjacent Davis Park, also a former Brownfield site. The City currently has Fehr-Graham and Associates under contract to perform Cleanup Oversight in conjunction with the current USEPA Cleanup Grant Programs at 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-00E45801-5. 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 will secure the needed environmental services through the City's Procurement Process.

b. 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.

c. Past Performance and Accomplishments

i. Has a Current USEPA Grant and 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 2016 and several new Cleanup projects have been identified to use these funds. Two Cleanup Grants, BF-00E1077 and 78 are nearing completion and will be closed out during the second quarter of FY 2016.

1. Compliance with Grant Requirements: Each of the first three grants listed below has complied with Grant Requirements and has been closed out. Cooperative Agreement numbers are provided.
2. Accomplishments are summarized below for each of these grants:

Grant Description	**Amount**	***Accomplishments: Assessments or* CA Number**	**Accomplishments: Cleanup or *CA Number***	**Redevelopment Project?/ NFR Letters**
Community Wide Assessment	***$400,000***	***14 phase I ESA's 6 Phase II ESA's***	***CA BF-00E00435***	***5 No Further Remediation Letters***
Cleanup Grant: Haz. 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-00E00079**	**1 No Further Remediation Letter (.6 acre)**	**Future Amtrak Station Development.** [2]
RLF Cleanup Grant: Petroleum	**1,000,000**	**CA BF 00E45801-5**	**$1,000,000 programmed to Ingersoll**	**$24,000,000 Indoor Sports Complex; 70% complete**
RLF Cleanup Grant Hazardous Subst.	**$1,050,000**	**CA BF 00E45801-5**	**$700,000 to Tapco; $450,000 to Ingersoll**	**$24 Million Indoor Sports Complex; Future Amtrak Station**

[2] The Indoor Sports Complex at Ingersoll is a $24 million dollar project with a $12 million general obligation bond from the City; project is 70% complete as of 12/15/2015; will open May of 2016 Originally the Amtrak station was planned for another site but was moved to the Tapco Site. Other leveraged funds included the Illinois EPA River Edge Program, the Illinois DCEO River Edge Program, IKE Disaster Recovery Funds and the USEPA Cleanup Grant (FY2013).

Draft
ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

Asbestos Removal

Former Rockford Watch Factory: Original Structure
325 South Madison Street

Brownfields Cleanup Grant Application

TABLE OF CONTENTS

Page

1.0 INTRODUCTION 3

2.0 SITE BACKGROUND 3

3.0 ASBESTOS REMOVAL
Error! Bookmark not defined.

4.0 CLEANUP ALTERNATIVES 4

4.1 Alternative 1 – No Action 4

4.2 Alternative 2 – Asbestos Removal Prior to Rehabilitation of the Original Structure 5

5.0 RECOMMENDATION 4

6.0 DECISION DOCUMENT 4

1.0 INTRODUCTION

The former Rockford Watch Factory is located at 325 South Madison Street, with the west boundary of the property being the Union Pacific Rail lines, the north boundary being the School District Property (former administration building), the east boundary being Madison Street and the south boundary being the Union Pacific Rail Line. 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 former Rockford Watch Factory property, specifically the original watch factory structure. A preliminary asbestos survey and a Phase I Environmental Site Assessment were performed prior to City acquisition of this property during the summer of 2014. This initial phase of this project will be asbestos removal from the additions to the original Rockford Watch Factory structure prior to the demolition of those additions. This Cleanup Grant request is for asbestos removal from the original structure which is planned for rehabilitation after the asbestos removal is completed. There is a third stage to the Watch Factory Site which will consist of completion of Phase II ESA work and cleanup of the 2.5 acre site. This environmental work is proposed to be funded by Illinois EPA River Edge Funding and/ or USEPA RLF funds.

2.0 SITE BACKGROUND

The Rockford Watch Factory Original Structure was constructed in 1880 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. The future use of the property is proposed to include parking and landscaping that will support the Indoor Sports Complex as well as the original Rockford Watch Factory that will be retained and repurposed.

The Phase I Environmental Site Assessment for the Rockford Watch Factory site was performed during 2013 and the updated document was completed on June 7th of 2014.

3.0 Asbestos Removal

Asbestos Removal must be performed in the original structure before the original structure can be repurposed. This asbestos removal as well as the future completion of the site cleanup should put this property in the position for reuse of the building for a use beneficial to the surrounding community.

4.0 CLEANUP ALTERNATIVES

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 $250,000 to $300,000 or more because of the extent of the asbestos in the structure.

4.2 Alternative 2: No Asbestos Removal

1. Effectiveness – This alternative addresses 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 30-day public comment period with additional details on the selected alternative.

7.0