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2 **Appendix B**
3 **Section 106 Consultation**

1 **B1. Meeting Minutes**

NHPA Section 106 Consulting Parties Meeting #1

Date: January 19, 2023
Project name: 202-220 S. State Street, Chicago, Illinois

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Attendees
(sorted
alphabetically):

- Anthony Rubano – IL SHPO

- Angel Dizon - GSA

- Bartosz Rolski - GSA

- Beth Savage - GSA

- Betsy Merritt - NTHP

- Carla Mykytiuk - Jacobs

- Carol Wallace – IL SHPO

- Charlie Webb - Jacobs

- Christopher Allison - Dominican University, Chicago Collaborative Archive Center

- Christopher Cody - NTHP

- Christopher Jakubowski - Property Management at Marc Realty

- Cynthia Roubik – City of Chicago

- Frank Butterfield – Landmarks Illinois

- Greg Rainka – Commonwealth/Jacobs

- Holly Fiedler – Franciscan Central Archive; Chicago Collaborative Archive Center

- Jeffrey Jensen - GSA

- Jeff Kruchten – IL SHPO

- Jessica Wobig - Jacobs

- Joe Mulligan - GSA

- Kandalyn Hahn – City of Chicago

- Kendra Parzen – Landmarks Illinois

- Kevin Harrington – Mies Van der Rohe Society, Illinois Institute of Technology

- LaDon Reynolds - US Marshalls

- Laura Lavernia - ACHP

- Laura Rusiniak - GSA

Minutes

Lori Durio Price - Jacobs

Lucrezia Patruno - GSA

Malachy McCarthy – Retired archivist, Claretian Missionaries; Dominican University

Marc Zitzer - GSA

Mark T. Buechel - NPS

Mary Lu Seidel – Preservation Chicago

Matt Crawford – City of Chicago

Michael M. Edwards – Chicago Loop Alliance

Michael Woods-Hawkins - US Marshalls

Nicky Emery - GSA

Noel Cotts - U.S. Department of Homeland Security, Federal Protective Service

Rebecca Pallmeyer - US District Court for the Northern District of Illinois

Regina Nally - GSA

Robert Green (GSA)

Rob Johnson – BOMA Chicago

Ryan Festerling - U.S. Department of Homeland Security, Federal Protective Service

Sarah Schrup - United States Court of Appeals for the Seventh Circuit

Thomas Bruton - US District Court for the Northern District of Illinois

Victoria Kahle - United States Court of Appeals for the Seventh Circuit

Ward Miller - Preservation Chicago

Zachary R. Tarr - U.S. Department of Homeland Security, Federal Protective Service

Carla Mykytiuk (Jacobs, Facilitator) started the meeting.

General Services Administration (GSA) lead introductions followed by other agencies involved in the undertaking; other agencies involved in Section 106 consultation; and other participating consulting parties.

Angel Dizon (GSA, Regional Officer) provided an opening statement for GSA. Dizon explained that a public scoping meeting (under the National Environmental Policy Act [NEPA]) was held in November. November's meeting introduced the reason for the project. First off, to provide security to the courts, respond to the congressional intent and also manage our public assets. As a Regional Commissioner, my responsibility is to provide public platforms that are performative and functional and part of that performance requirement is security. My goal is to make sure that all of these platforms are able to provide and maximize economic, environmental and social outcomes. I understand that there is a whole diverse set of opinions and backgrounds and expertise on this call. But I think collectively, all those voices can probably identify opportunities for us to consider as we develop alternatives.

Regina Nally (GSA, Region 5 Historic Preservation Officer) echoed Dizon's opening statements. Nally reiterated that today's meeting intention was to identify and explore alternatives that meet security needs. Nally followed up with meeting goals and offered the following statements:

- GSA recognizes the large undertaking, overall complexity, and general discontent about demolishing buildings in the National Register district
- GSA will follow Section 106 very closely to come to an agreement among the consulting parties
- Consulting parties represent a broad spectrum of local, state, regional, and national parties, including advocacy groups, local partners, tenants, and the public
- GSA is seeking dialogue to understand potential development opportunities for GSA's S. State Street properties with the main purpose of selecting a preferred alternative
- GSA is seeking alternatives (demolition, reuse, or no action) that consider federal opportunities and community assets for the use of GSA's S. State Street properties
- GSA is invested in dialogue as part of the Section 106 process with the goal of agreeing on a path forward for the future of the site

Laura Lavernia (ACHP, Program Analyst/GSA Liaison) stated that informational materials provided in advance of today's meeting were appreciated, but asked if GSA could elaborate further on the undertaking, in particular security requirements that may hinder alternatives?

Carla Mykytiuk clarified that further discussion on this topic (alternatives and security needs) is planned for later discussion and part of the meeting will offer opportunity for dialogue. Mykytiuk then continued on with the meeting ground rules, which included limiting comment to Section 106 concerns and keeping representation to a primary and secondary contact for each consulting party. The meeting is not intended as public information. In addition, the collaborative nature of the meeting requires respectful dialogue and commitment from all parties. Future meetings may include smaller working groups, and meeting minutes will be provided after each meeting.

Kandalyn Hahn (City of Chicago, DPD, Historic Preservation) asked if today's PowerPoint would be provided? Mykytiuk confirmed it would be made available to consulting parties.

Lori Durio Price (Jacobs, Senior Cultural Resources Lead) continued with the presentation and stated that the meeting materials sent out to all consulting parties before the meeting included a link to the ACHP's Citizen's Guide to Section 106. Price acknowledged that some consulting parties have depth of knowledge in historic preservation but not all parties may be as familiar with the Section 106 process. Accordingly, Price then provided an overview of the federal law and guiding regulations for Section 106, as well as its process. The National Historic Preservation Act is, in fact, an actual federal law that requires federal agencies to consider the effects of their undertakings on historic properties. A historic property is defined as any district, site, building, structure, or object that is either listed in the National Register of Historic Places or has been determined eligible for listing in the National Register of Historic Places. So it does not have to actually be listed to be subject to Section 106. It only has to be determined eligible. This is the first Section 106 consulting parties meeting for the undertaking and is aimed at developing next steps. GSA has initiated Section 106 and established an initial Area of Potential Effects (APE). Though the identification and evaluation of historic properties in the APE remains in process, the Chicago Loop District and numerous National Historic Landmarks (NHLs) have been identified within the APE. Next steps will include considering comments on the APE, continuing to identify and evaluate historic properties within the APE, completing an assessment of adverse effects, and resolving any identified adverse effects. GSA recognizes that we do potentially have an adverse effect because one of the possible alternatives involves demolition.

Price paused for questions.

Laura Lavernia clarified that the Section 106 process has four steps (initiation, identification, assessment, and resolution). Price clarified that the presentation broke down the second step (identification) into an

identification and evaluation step to help demonstrate the required steps in more detail to consulting parties who may be unfamiliar with the technical aspects of Section 106.

Lori Durio Price continued by providing a status on the Section 106 process. In addition to having initiated Section 106 with consulting parties, GSA has:

- Developed an initial APE
- Identified initial historic properties within the APE including Loop Retail Historic District; Chicago Federal Center; Printing House Row NHL and other NHLs
- GSA's properties at 202 and 220 S. State Street are contributing resources to the Loop Retail Historic District
- GSA's properties at 208-212 and 214 are noncontributing resources to the Loop Retail Historic District
- The initial APE considered the physical footprint of GSA's properties, and also took into account a larger viewshed area. The larger area considered potential areas that may be affected during construction or other aspects of the proposed action
- GSA is requesting comment on the proposed APE

Price paused for questions.

Ward Miller (Preservation Chicago, Executive Director) commented that the APE appeared arbitrary and made several suggestions that included:

- Consideration of other historic properties and districts beyond the initial APE
- Suggested a boundary that extended to Wacker Drive to the north; Wells to the west; Michigan Boulevard to the east; and Ida B. Wells to the south

Regina Nally (GSA) responded to Ward Miller's comments about the APE. Nally explained that GSA did look beyond the proposed APE during its development. GSA considered:

- the Michigan Avenue District
- sightlines from corridors
- density and elevation
- surrounding high-rises
- visual effects to a larger downtown area

Nally said GSA would consider his comments and noted that we'll have more dialogue about it as we continue on in consultation.

Ward Miller followed up with an additional suggestion to extend the APE to the main branch of the river, Grant Park to the east, and the Chicago River to the west.

Laura Lavernia asked if the SHPO has provided comment on the APE?

Carol Wallace (SHPO, Regulatory Review Manager) stated that SHPO commented on the APE in a letter on December 13, 2022. SHPO suggested that the APE for the undertaking include the boundaries of the Loop Retail Historic District which was listed on the NRHP in 1998. SHPO would have to look into these suggestions and do some research to determine if they agree with those or not.

Lori Durio Price continued to provide the Section 106 status. GSA has identified an NRHP district and NHLs. NHLs have an extra layer of review. As such, the Secretary of the Interior was notified that NHLs have been identified within the APE.

Mark Buechel (NPS, Midwest Region, Historic Architect) confirmed that NHLs require additional review. We try a lot harder to avoid as opposed to minimize or mitigate when it's an NHL. NPS also agreed with the proposed APE and appreciated the inclusion of the Loop Retail District in its entirety.

Regina Nally reiterated that GSA is in the initial stages of the Section 106 process and is collecting information so that recommendations can be made.

Joe Mulligan (GSA, Program Manager) provided additional background on the undertaking.

- 2022 - \$52 million Congressional appropriation for demolition of GSA's S. State Street properties
- 2007 – GSA acquired the S. State Street properties to improve Federal Center security. Our objective in the security needs is we're still looking to maintain and enhance the security operations. So that's why demolition is one of the alternatives in response to the congressional intent, but also we have additional alternatives. And that's really where the value of all the consulting parties in our consultation will come into play.

Regina Nally added that the long timeline (more than 15 years from initial acquisition to the present funding) has been further challenged by political, social, and cultural changes. GSA has made considerable effort to find a federal use for the S. State Street properties, but changes in federal office demand, space and staffing, as well as reorganization within federal agencies, has hampered potential uses. GSA has previously sought funding to find ways to use the properties but were unable to identify enough uses to justify federal funds. Subsequently, GSA looked at ways to transfer the properties out of federal ownership, but federal control is needed to meet security needs. Therefore, GSA is requesting potential development opportunities that interface with security needs.

Ward Miller stated that concerns about the S. State Street properties arose within the first 10 years of federal ownership. This resulted in the buildings being listed on Preservation Chicago's 7 most endangered list. Miller referenced a previous new construction project carried out for the Federal Bureau of Investigation (FBI) that moved the FBI out of the Federal Center (and that could have been a viable use for the existing buildings). Miller expressed disappointment over promises from the federal government in the media and also at various meetings that the S. State Street properties would be saved, and this promise to the general public and to all of us and the architectural preservation community has been languishing for 17 years. And that's frustrating.

Joe Mulligan stated that Miller's comments fall into the category of federal need and would be addressed in forthcoming documentation such as the Environmental Impact Assessment and related documents.

Lori Durio Price reiterated the undertaking is assessing the future for these four buildings, and the things that have to be addressed are the federal security vulnerabilities for the courthouse, responding to the Congressional Appropriations Act, and managing the federal assets. The preliminary alternatives include demolition, viable adaptive reuse options, and no action. Other alternatives may also be identified as we go through the process. Price then provided an overview of comments received, including concerns over the loss of important architectural heritage, potential negative impacts to the Loop Retail District and pending UNESCO World Heritage Site, as well as negative effects on heritage tourism in Chicago. There were concerns that demolition could alter the character of the loop and affect public safety in the area due to having a vacant plaza, and that demolition could set a national precedent that would endanger important historic resources that are adjacent to other federal courthouses. Price noted a comment that the two buildings on the site were brought forward by Chicago Landmarks on September 8 with the recommendation for preliminary landmark status. A presentation was given and it was recommended that a report or statement be created on the local landmark eligibility status of those buildings. Other comments are that the feasibility of the adaptive reuse alternative is limited by the security requirements, and there's concern that GSA has allowed the buildings to remain vacant and that as a result, there is some disrepair. Price opened it up to new comments and stated that GSA will provide a comment matrix; she then described how today's session planned on capturing comments, including in chat, verbally, on a virtual whiteboard.

Laura Lavernia asked that GSA provide further rationale of how security concerns can be addressed as part of the undertaking. Lavernia referred to previously provided information from the November scoping meeting and commented that the November meeting lacked substantial information about this consideration.

Regina Nally reiterated that GSA is in the beginning stages of the Section 106 process and no conclusions are available at this time. Nally mentioned that the November scoping meeting included a list of concerns but these concerns are not fully concluded. GSA understands that security needs will need to be addressed and more developed as the Section 106 process proceeds, to which Laura Lavernia agreed. Nally finished by stating that GSA anticipates multiple conversations with consulting parties and feedback about potential opportunities from the group.

Laura Lavernia asked what the goal of today's meeting is. Do you want comments on the particular stage that you're at in the Section 106 process? Are you trying to wrap up your identification efforts? In other words, do you want to know if there are additional buildings? My goal as a program analyst for the Advisory Council is to sort of help the federal agency and keep you on track with regards to the Section 106 process. So first of all, I'm letting you know that I think the undertaking should be a little bit more fleshed out with the background as to the security concerns as part of identifying the undertaking. So that's a recommendation. I'm saying also at this point what do you want? What does the federal agency want at this point from the consulting parties that you've called here.

Regina Nally responded that GSA is still in the early stages of identification and evaluation. From our perspective, we are also still identifying the security needs. We've shared that and we certainly are open to having discussions about them and recognize that that is a key objective in finding our path forward through this. But I think we're anticipating that we're going to have multiple conversations over time that are not always linear. We can certainly talk about some of those security points, but I think what we also want is to have feedback from this group, an understanding of their thoughts for redevelopment opportunities. What should we be looking at? And once we kind of start understanding what some of those are, we can evaluate them in conjunction with the security needs. So I guess all I'm trying to say is that it's not fully linear. There is some crossover conversation that needs to happen around all of these issues, and we know that the consultation process is going to be involved and we will have multiple discussions over the next several months.

Kandalyn Hahn (City of Chicago Division of Planning and Design) commented that comparable sites should be gathered for study (Can anything be learned from those comparables where buildings are in similarly close proximity to courthouses?); viable adaptive reuse should be explored for some or all of GSA's S. State Street properties (not only the group of buildings, but possibly individual buildings); and have any alternatives been identified that meet the necessary security objectives; and will the GSA be actively soliciting those viable alternatives to demolition? Thank you for your efforts to find the solution that respects the needs of all the stakeholders and recognizes the economic, historic, and security considerations involved with these properties.

Mark Buechel (NPS) questioned the congressional appropriation for demolition and cautioned that the NHPA has some pretty strong language in it with regards to agencies or the government trying to usurp this process. And the reality of it is that you shouldn't even be mentioning that here; it should not be allowed to influence this process just because you have money for demolition and you may not have money for rehab. That's irrelevant. You need to go through the process to avoid, minimize or mitigate, and we may ultimately get to the end to where demolition is the result, but it kind of appears like you're applying some undue pressure by mentioning this and it really shouldn't be part of the presentation at all. You just need to follow the process and the result is what the result is.

Ward Miller asked, on the security concerns, has the GSA or any of the other agencies considered that these buildings right now are a shield to the Federal Center and especially a vulnerable side of the Federal Center, as we understand it, with the judges' chambers of the courtrooms? Seems like the east side of the building is perhaps more vulnerable and the west side that opens to an open plaza, the Federal Center. But has anyone considered the fact that these two buildings, actually four, but especially the two taller buildings do create a shield? Miller also highlighted the potential to adversely affect the 1970s Mies van der Rohe-designed Federal Center. He pointed out that these buildings were very much a part of Mies van

der Rohe's vision for the Federal Center. He very much was interested in these early Chicago School steel frame buildings. The Consumers building and the Benson Rickson building really was the main entrance to the Dirksen Courthouse of the Federal Center. And that has basically been turned into an alley, which is unfortunate. In your security list, I really do think that in the age of drones and other things that the security concerns are much greater than our concerns of 10 or 20 years ago and these buildings, if you will, shield the components of the Federal Center. Their potential demolition as proposed here impacts Mies's design and I think that we're actually compromising Mies's overall vision and design of the Federal Center. And we're not talking about the 1870s Berghoff restaurant buildings, which will definitely be impacted if there's a move to demolish the Century building. We're not only impacting an 1870s group of buildings which are very rare, but we're also perhaps impacting a Chicago institution that's been around for 100 years plus or more. So I just wanted to mention that on every level, this seems like an inappropriate action, an adverse action that will really impact the loop in a horrible way.

Joe Mulligan responded that it seems, based on more and more feedback, our next follow-on meeting can be focused on security aspects for the benefit of all the consulting parties. We do have our federal law enforcement agencies also as consulting parties. That was in one of our opening slides. In addition, Berghoff has been invited to be a consulting party, too. As we establish the framework of continuing these consultations with all of you, that can be a focal point of one of our upcoming meetings - to go through that to better understand what we do have under the adaptive reuse alternative criteria that, if achieved, the federal government believes would meet the security need. So that's what we've been referencing in the notice of intent for the adaptive reuse. But of course, with these discussions, we're interested in getting into the specifics and also brainstorming some of those points with all of you.

Laura Lavernia stated that she appreciates and understands that the thinking process is not linear. However, the 106 process is pretty linear. It's a four step process and there are entry and exit points at the four steps, so pardon me if I go back to my linear thinking. I guess I want to know if we have identified all of the buildings that are listed or eligible for listing on the National Register.

Regina Nally confirmed that historic property identification in the APE has started, and the Loop Retail District and NHLs have been identified, but historic property identification remains in process. GSA asks consulting parties to provide comment on additional historic properties that may be within the APE and asks for more specific feedback so that a Section 106 consultation plan may be developed. One thing that GSA can also do is work with our SHPO and our ACHP representatives and come up with some thoughts on how to best bring together the varied ideas and decisions that we need to make amongst this group, and we're open to listening to that and figuring out how we can best achieve that. We do recognize that this is very complex and we want to do our due diligence through this process and make sure that we are all understanding and respecting opinions and thoughts, and find a way to create a path that allows us to move towards a solution to this very complicated issue.

Laura Lavernia said what would be helpful is a consultation plan to know ahead of time how many meetings, what's to be discussed at each meeting so people can come prepared. These are all steps in a very complicated process for a very complicated undertaking. It would be helpful to know how many meetings will there be? What does GSA have envisioned and how can the consulting parties best help you? I realize that this was the first meeting and that this is a very good start. And I thought what we all received was wonderful.

Regina Nally responded that GSA's perspective was to be able to have this first meeting, recognizing that there would be questions that we weren't necessarily able to answer today. We knew that there was going to be some considerable longevity involved in this process. And we wanted to collect a variety of feedback on ways to keep the process moving, to share information, to help us recognize how we can pursue gathering more information about opportunities and solutions and our paths through this consultation, and to then provide a plan for moving forward with the intent of everyone's buy in on that. We anticipated that today might even have a little awkwardness. But we just wanted to have an opportunity for more personal time to hear some more specific feedback beyond what was given at the notice of intent meeting back in November so that we can start using those elements as building blocks to define how we can

structure our conversations going forward, with an idea of moving towards agreement and what that might look like down the road.

Carla Mykytiuk - In the interest of making sure that everyone who has attended the meeting has an opportunity to provide their input, I am going to in, in the absence of seeing other hands raised, do a little poll for consulting parties, and if you would like to make a statement or ask a question, this will be a good opportunity to do that.

Kendra Parzen (Landmarks Illinois, Advocacy Manager) added that more information about security concerns is necessary before suggested alternatives can be developed. I understand that this is a sort of nonlinear and very complicated situation, but I echo requests for a little bit more clarity about the process. I'm struggling a little bit to formulate specific comments without greater understanding, particularly on the security concerns. I would very much like to assist GSA with finding solutions and suggesting alternatives to these buildings, but I find that I need a little bit more information as a starting point to do that.

Kevin Harrington (Mies Van der Rohe Society, Illinois Institute of Technology) provided a detailed comment about the vulnerability of significant architectural resources within the APE and offered concern, particularly about the issuance of Congressional funds for demolition, and the viability of the process for a preservation outcome in general. It seems that the requirements for the viable alternative for these buildings are so complicated and so difficult that it's hard to imagine anyone actually being able to meet them, which makes one think that this is a process that's designed to fail in terms of the preservation of these two important buildings, or actually four. Instead of worrying about the borders for the APE, it's important to just recognize that Chicago's loop is one of the greatest and densest assemblages of great architecture in the world, which has already experienced substantial losses of the Shilling Garrett Theatre and Chicago Stock Exchange. Harrington asked that GSA consider if this undertaking may serve as an example of how to preserve historic property with developing security concerns so that this property can benefit citizens.

Harrington also offered comment on key characteristics of the Mies van der Rohe-designed Federal Center Complex:

- Quincy Court served as a principal access point of the site
- Quincy Court elevation is an example of the Chicago Frame
- Mies van der Rohe applied the Chicago Frame in the Federal Center Complex design
- Quincy Court connected east-to-west through the Chicago Loop, making it an important federal/public space

Harrington concluded that this unique and powerful architectural package was designed to convey the role of the federal government during its period of significance.

Cynthia (Cindy) Roubik (City of Chicago, Assistant Commissioner of the Division of Planning and Design) stated that the walkability of the downtown loop is unique to this location and is associated with a larger area than included in the APE. Roubik asked that GSA consider a larger APE and provide examples from other federally owned properties where security needs and preservation were achieved. Additional comment was offered about concerns over the vacancy and deterioration of GSA's S. State Street properties, as well as how the removal of the buildings and replacement with a vacant space may have a negative potential on the viability of downtown in general.

Michael Edwards (Chicago Loop Alliance, President and CEO) said it seems like the decision has already been made and you're just dragging us through a process. So I'd like to learn more about the security concerns that happened a decade ago to see if there may be some other alternatives that would cost less than \$52 million to make some changes, maybe within the current footprint of the federal government. And ask GSA and the judges to think more broadly about the impact that they're having on the surrounding community.

Malachy McCarthy (Dominican University and Collaborative Chicago Archives Center) offered an alternative use for GSA's S. State Street properties—a collaborative archive center. McCarthy described a vision for a collaborative archive center and the national need for such facilities. Religious centers, educational organizations, and other charitable groups are looking to consolidate archive space to achieve improved shared services and increased quality in the archival environment. These groups have rich collections of materials for scholarship, and the proximity to religious and educational institutions makes S. State Street a viable location. McCarthy continued on to describe how a center would have limited staff (less than 50 employees), and control over of the secured space. McCarthy described a vision for the site as a regional archival space within a preserved architectural resource. McCarthy expanded on S. State Street's proximity to the Center for Dominican Historical Studies at Dominican University, which offers a library and archival science program. McCarthy stated that Dominican University is an interested partner and further described the needs of an archival space, such as climate control and a preference for minimal to no exterior lighting in areas used for storage. Storage areas would not require open windows, and windows along the west elevation would be able to be infilled with bricks.

Mark Buechel (NPS) stated he didn't realize these buildings were acquired so long ago. Asked if GSA has ever done a reuse study that identifies potential uses that may work with the security concerns? Has there been a study done to see how you can modify these buildings – could the back have a significant modification since that's a secondary façade?

Joe Mulligan replied that GSA has a structural condition report in process on all four properties to note their structural and interior conditions and once completed, it will be made available to consulting parties. That was awarded this week and it's expected to be completed in a 10-week period. So we should have something that we would be able to provide to the consulting parties in the next couple of months.

Chris Allison (Dominican University) echoed the vision and need for a collaborative archive center, as described by McCarthy. Allison highlighted Dominican University's expertise and reputation as a responsible partner with an alternative that may alleviate many security concerns. Allison asked if the Congressional funding may be used for construction?

Joe Mulligan confirmed that it is earmarked for demolition. The funding available is specifically assigned under the appropriation for demolition, along with those subsequent related factors like protecting adjacent sites, securing the site and landscaping. GSA is in the process of planning partial removal of fire-escape and parapet from the S. State Street properties. This action is subject to Section 106 and will go through the standard review process separately from the subject of today's meeting.

Lori Durio Price introduced potential next steps for future consulting party meetings. Price described GSA's vision for monthly consulting party meetings and smaller working groups to continue through the end of 2023. The smaller working groups could report back to the entire group during the monthly meetings. This would allow more specialized topics to be addressed and best utilizes the group's time for larger topics. We also wanted to poll the group about dates and times. Is an afternoon meeting a good time for people? What about virtual versus in person meetings? How do people feel about that? Should we have a mix? Do we want to try to do them all virtually? Price suggested that the next meeting could potentially be focused on security concerns.

Ward Miller agreed with monthly meetings and said in person meetings are nice and suggested the potential for hybrid meetings. Miller did not agree that smaller working groups would be beneficial but agreed that specific topics at each meeting would be a good approach.

Regina Nally stated that the goal is to be inclusive and responded to Miller's comment about smaller working groups by stating that smaller groups may be more efficient at tackling complex issues. Nally restated that monthly meetings would be preferred so that a clear timeline can be developed.

Minutes

Lori Durio Price stated that potential calendar dates will be sent out to the group so that a meeting can be scheduled within the next 30 days.

Carla Mykytiuk noted she did a quick poll on virtual meetings versus in person. Right now, 80%, which is 12 people, said virtual and three people chose in person. That's not to say that that's how it will go, but that's what the responses were from this group.

Ward Miller asked Joe Mulligan for clarification that the fire-escape removal project was part of the Congressional award. Joe Mulligan confirmed that was correct; it is an active project that is at 50 percent design. Mulligan continued that a second project was in process but is related to life safety so is being treated differently. Mulligan concluded that all agencies who typically review standard Section 106 projects will receive submittals and GSA will share with appropriate consulting parties. Miller asked if the terracotta parapet on the properties will be salvaged? Joe Mulligan confirmed that architectural salvage and storage is anticipated but GSA is still in process of consideration.

Carla Mykytiuk adjourned the meeting as the two-hour meeting period had concluded.

Next steps:

- GSA to define APE and continue identification of historic properties in APE.
- Proposed meeting times will be sent out to group and next meeting will occur in approximately 30 days.

NHPA Section 106 Consulting Parties Meeting #2

Date: March 1, 2023

Project name: 202-220 S. State Street, Chicago, Illinois

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Attendees

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alphabetically):

Anthony Rubano – IL SHPO staff

Beth Savage - GSA

Bob Appleman – IL DNR

Brianne – unidentified participant

Carla Mykytiuk - Jacobs

Carol Wallace – IL SHPO staff

Carey Mayer – IL Deputy SHPO

Charlie Webb - Jacobs

Chris Koeppel - ACHP

Christopher Allison - Dominican University, Chicago Collaborative
Archive Center

Christopher Cody - NTHP

Cynthia Roubik – City of Chicago

David Grignon – THPO, Menominee Indian Tribe of Wisconsin

Eiliesh Tuffy – City of Chicago Department of Planning and Development

Frank Butterfield – Landmarks Illinois

Greg Rainka – Commonwealth/Jacobs

Holly Fiedler – Franciscan Central Archive; Chicago Collaborative Archive
Center

Jeffrey Jensen - GSA

Jennifer E Styzek - GSA

Joe Mulligan - GSA

Kandalyn Hahn – City of Chicago

Kathleen Kowal - EPA

Kendra Parzen – Landmarks Illinois

Kevin Harrington – Mies Van der Rohe Society, Illinois Institute of
Technology

Minutes

Keira Unterzuber – Administrative Office of the U.S. Courts

LaDon Reynolds - US Marshalls

Laura Lavernia - ACHP

Laura Rusiniak - GSA

Logan York - Deputy THPO Miami Tribe of Oklahoma

Lori Durio Price - Jacobs

Lucrezia Patruno - GSA

Malachy McCarthy – Retired archivist, Claretian Missionaries; Dominican University

Mark T. Buechel - NPS

Alek Jaunzemis – Chicago Loop Alliance

Michael Gonczar - GSA

Michael Woods-Hawkins - US Marshalls

Michelle Rau - Jacobs

Nicky Emery - GSA

Olivia Nunway – Assistant THPO, Forest County Potawatomi Community, on behalf of Mr. Benjamin Rhodd, THPO

Rebecca Pallmeyer - US District Court for the Northern District of Illinois

Regina Nally - GSA

Robert Green - GSA

Rob Johnson – BOMA Chicago

Ryan Festerling - US Department of Homeland Security, Federal Protective Service

Thomas Bruton - US District Court for the Northern District of Illinois

Traci Murray - US District Court for the Northern District of Illinois

Victoria Kahle - US Court of Appeals for the Seventh Circuit

Ward Miller - Preservation Chicago

Teddy Meredith (for Zachary R. Tarr) - US Department of Homeland Security, Federal Protective Service

312-497-0276 unidentified caller

309-241-0599 unidentified caller

Ipad Air 2 - unidentified participant

Joe Mulligan (GSA) opened the meeting and welcomed new participants, including three tribal representatives. He reviewed the agenda and explained that Security, Condition Assessments, and Viable Adaptive Reuse alternatives would be discussed at later meetings devoted to those topics. This meeting will continue the discussion on the linear steps of the Section 106 process that we need to address – APE and identification of historic properties.

Greg Rainka (Commonwealth Heritage Group) – Greg presented the APE and stated that GSA will be moving forward with the APE that was previously presented and that the SHPO has agreed is appropriate. GSA did revisit the APE after receiving comments last month, but feels the boundaries are sufficiently large and inclusive enough to ensure potential effects to historic properties are being considered. In the future we could revisit the APE again if we need to, for instance, if we have more details about the undertaking, the specific alternatives come to light and we recognize that the effects could be more far reaching. Greg provided regulatory definition of an APE and explained that an APE covers where an undertaking could change the character or use of a historic property. In other words, alter a property's identity, what makes it significant, and then allows it to convey that significance. Effects can be direct or indirect; direct effects include physical, visual, auditory, or atmospheric impacts, whereas indirect is thinking more in the future about secondary, cumulative or future impacts that we can reasonably foresee. Every undertaking has a different APE, which should be a reflection of that specific action that's being undertaken. The APE takes into account all the details, all the alternatives as well as things like the location, the surrounding environment and the context. For this State Street undertaking, the considerations for defining the APE were primarily the physical impacts and also the potential visual or contextual impacts. The physical impacts include the close in and tangible things - removal of buildings, damage to buildings, alteration of buildings, property neglect or the transfer, lease or sale of a federal property. The undertaking also has the potential for visual impacts. In defining the visual APE, we asked ourselves three questions. Where could the undertaking change the historic or architectural character of a historic property? Where could the undertaking cause alterations to a historic viewshed? And where could the undertaking perhaps introduce some new visual elements within a historic setting? To get a better feeling and sense for the extents of these visual impacts, we walked the entire area and completed an on the ground viewshed analysis. Greg then showed street-level images of the viewsheds around the State Street buildings. Greg explained the verticality of the downtown area was considered when deciding the APE boundaries. In Chicago, the architecture is not only experienced at street level, so the area of potential visual effects also extends to include the high rise buildings in this area that do have a good view of the State Street buildings from their upper floors.

Greg then presented a timeline of the APE development. A first draft was done last summer and was quite a bit narrower in focus and limited primarily to properties with a direct line of sight to the State Street buildings. After the viewshed analysis, the APE was enlarged to include those State Street and Adams Street view corridors. This is the initial APE we submitted to the SHPO for review in October. We received a response from the SHPO in December that recommended we enlarge the APE to include the entirety of the Loop Retail National Register historic district. GSA made that change and, in keeping with that logic, we also enlarged the APE to encompass the Printing House Row Historic District since that is a National Historic Landmark and more than half of that district was within the previous APE boundary. This is the APE that was presented at the last meeting and the one that GSA will be moving forward with. To summarize the APE boundary, it's the National Register boundary of the Loop Retail Historic District to both the north and south, Michigan Avenue to the east, and Wells Street and the elevated tracks to the west. We feel this encompasses the immediate area of the direct physical impacts and also covers the significant view corridors down State Street as well as Adams Street, and then also other areas where we think there could be visual or contextual impacts. We don't see a need to have a larger APE at this time. Once we get through the consultation process here and we agree on any avoidance, minimization or mitigation measures to resolve adverse effects to historic properties within this APE that we've defined, that would also address any effects that might extend beyond that. We've captured the heart of the undertaking's effects with this APE.

We should clarify the difference between an APE and a study area. So, a study area is generally much broader than an APE and it's really a tool that we use to provide a context for understanding our APE. It's also used to provide the background that we need to assess the significance of properties within our APE. For this undertaking, our study area really is much larger; it's at a minimum the Loop. Without that larger context, we really can't know why a property may or may not be significant.

Minutes

Regina Nally (GSA) introduced herself to the new attendees and underscored GSA is looking at means by which we would avoid, minimize or mitigate adverse effects as a result of this undertaking. We think that the means by which we would do that within this APE, as Greg said, would also avoid, minimize, or mitigate effects beyond our APE, if we discover that there would be effects, but we don't believe that the boundary needs to be extended beyond what is shown currently. But we still want to have this opportunity to hear from you and hear what your thoughts are about how we got here, why we're defining it this way. Maybe we could start with any comments from the State Historic Preservation Office or the Advisory Council for Historic Preservation.

Chris Koeppel (ACHP) expressed thanks for being invited and participating in this consulting party meeting and was just eager to hear more about the presentation and this discussion.

Regina then asked for any comments from the other consulting parties.

Joe Mulligan (GSA) noted that Ward Miller with Preservation Chicago and Cynthia Roubik with the City of Chicago had previous questions on the APE. Since they were both on the call, Joe wanted to circle back with each of them.

Ward Miller (Preservation Chicago) stated it seemed unusual when talking about viewsheds that first of all, we're not considering the impact from adjacent and nearby tall high rises, realizing that the Loop is a very vertical neighborhood or community environment, and that even the views from the Federal courthouse and buildings as far west as the river and as far east as Michigan Avenue will see the potential loss of these buildings, if that's where things go. I think a lot of us, the people that I talked to within our circles, were disappointed with the responses that almost seemed, if you will, a little canned, so to speak. I'm wondering why we wouldn't take in that larger area suggested, which would also include landmark buildings and landmark districts, especially the Michigan Boulevard Landmark district that's one block out of this range, as that really comprises a number of early Chicago School skyscrapers that are very important. These two buildings, of course, are the last of the Chicago School skyscrapers. It seems like there is a relationship that people would think of, and that people would see, as you showed in your analysis and your photos. It would be a relationship that's really important to these early buildings and these landmarks, so I wanted to just again suggest that the Michigan Boulevard District, which is a landmark district, is a designated Chicago Landmark District, be included in this APE as well as consideration of what one sees from above as we all go into these skyscrapers and we're amazed by the built environment. In Chicago, we're very proud of it and I think that should be something to consider - the idea of moving, as we discussed in our last meeting, and there were a number of people that were on board with this suggestion, the idea to take the river at the north as a boundary, the Chicago River at the west as a boundary, and maybe Roosevelt Road at the south as a boundary. And east, of course, Lake Michigan.

Regina responded with appreciation for Ward's comments. We have given some consideration to the viewsheds from the high rise buildings. And I think that we were uncertain that the Michigan Avenue district as a whole would be impacted by what series of activities may eventually be defined as our final decision for this site. Maybe in order to get a better understanding of that, we can find an aerial image and see if we can get a better understanding of the buildings that are of the era of these buildings on State Street and understand more clearly what those individual viewsheds would be. Also looking at it from some historical aerials could be interesting. I don't think that's something that's unreasonable for us to do.

Ward Miller said we're talking about visual viewsheds, but when one thinks of the great buildings of the Chicago School, all these early skyscrapers, you almost get these connections inside of you that relate to all these really fabulous buildings along State Street, along Michigan Avenue, throughout the Loop and even into the South Loop and a few buildings a little further west. I think of these structures as being central to that larger story of the Chicago School of Architecture, the steel frame building, the use of terracotta, and I think it's just so incredibly important to realize the impacts would be so severe if these buildings are lost, and it would impact so many viewsheds and also perhaps impact a lot of other things like the State Street street-wall, our UNESCO World Heritage Site which is in danger with this demolition.

I think there's so much to lose on this front and we really want to encourage and we want to be here to help. We want to encourage a preservation solution to these buildings that is fitting of them; they are amazing structures of the Chicago School of Architecture and they are the last buildings of that period. So I wanted to share that.

Regina responded that looking at a series of aerial images will help provide a greater kind of understanding of that context and we'll commit to looking at that and reporting back to you. Thank you.

Joe pointed out that the boundary of the APE encompasses some of that Michigan Avenue District and that would be seen when we get to the historic properties discussion in greater detail, where we have those districts identified.

Ward stated that when he thinks of the great buildings of State Street, one of our most magnificent, important streets, along with Michigan Avenue, he thinks of these streets all intertwined and interconnected both geographically and physically and really towards the built environment. We've been thinking for a long time of going down the path of, well, we have a Michigan Boulevard Landmark District. Why don't we have a State Street landmark district? Why don't we have a LaSalle Street Landmark District? They're each very important and they tell this important story. And if we lose these kinds of buildings, we're really squandering our history. And we're throwing ourselves back to the days of the Stock Exchange and the Garrick demolition, which were national embarrassments. And to this day, pieces of those buildings end up in museums around the world, from the Art Institute to the Met in New York to the Museum D'Orsay in Paris. We really want to see a terrific outcome here. But I think we first have to realize how important these buildings are to the City of Chicago in the built environment and this area of potential effect.

Cynthia Roubik (City of Chicago) said my comment initially from our first meeting and that was about how people move through the Loop, taking transit and moving from one area of the Loop to the other. That's a component that I think is also important to understand in terms of the area of potential effect because a lot of the Loop experience is intertwined with the experience of our transit system in the Loop. My hope was that you would address looking at it from that angle as well and I don't feel like you have either in your presentation just now or in the responses that you sent out.

(Joe and Regina lost internet and rejoined. Cynthia restated her question.)

Cynthia restated that her concern about the APE was in relationship to how the Loop really is primarily experienced by pedestrians and people taking transit to and from different parts of the Loop. I don't feel like your response really addressed that, like the experience of taking the L around the Loop, the experience of arriving at a train station and walking through the Loop and passing the areas within the APE. That's what I really wanted you guys to consider because it's very specific to the history of the Loop and how the Loop has developed over time.

Joe thanked Cynthia for clarifying that question as GSA didn't realize the context was transit around the Loop.

Regina responded to Cindy's point, noting that it aligns with the comments that both Kevin and Ward have shared about looking at it from the context of the Loop. The transit around the Loop is part of what we did look at initially but maybe we need to share some more of the images that we took to inform our conversation about that and our walk through. So we'll take a second look at some of those things and we'll address them in a follow-on conversation.

Kevin Harrington (Mies Van der Rohe Society, Illinois Institute of Technology) pointed out three things about the images we just saw, which he assumed were taken in the last couple of months when it was gray every single day. But when we think about the Loop and the area of potential effects, we also need to consider time, light and color. In three weeks, we're going to have Chicago Henge again. It happens twice a year. It's an extraordinary thing. And the quality of light in the Loop and in the buildings in the Loop changes by the hour throughout the day, every day throughout the year. So time needs to be considered. The quality of light in the Loop is also important. The quality of Loop buildings at night, when the city is a

city of space and light and is different than it is in the day, when it seems to be a very solid city. That's part of the potential impact. And color is the third. These buildings that we're considering were built in the 20s when terracotta was becoming a leading material and its lightness was exploited for the fact that it bounced light. In two of the photographs shown for the area of potential impact, in the foreground in one was the Rookery building, a dark brown building, which is very different from the very light gray and white terracotta of the 202 and 220 buildings and from upper State Street looking south, you saw the darkness of the Chicago building, that dark brown, so that quality of time, light and color it seems to me also needs to be part of the assessment of the area of potential effects in the Loop. These are the kinds of things that not everybody's going to pick up on. But I think for people who are astute about the quality of Chicago's architecture, it is going to matter. Chicago is one of the great places in the world for the quality of its architecture, and we need to preserve as much of it as we possibly can.

Regina responded that she appreciated Kevin's comment and that it relates to the seven aspects of integrity defined under the Secretary of Interior's Standards. They're interesting points that we'll take into consideration, along with looking at some aerial images, and continue discussion on it.

Joe noted that Holly Fiedler (Franciscan Central Archive; Chicago Collaborative Archive Center) posted a question: "With reference to Kevin Harrington's mention of time, light, and color... other building's use of materials... Isn't that at the heart of the choice of why the courthouse is glass faced? Reflective of its environment?" Joe asked her for clarity or elaboration on the question.

Holly responded that the architects chose glass for a reason – being able to see the environment that it's in. And not just the built environment but how that changes with the architects' around him choice of building color – terra cotta vs the red – but also the time of day. There was a specific reason for why that was glass-faced versus the buildings around it not. That was all part of the vision and part of the choice of its environment. Joe noted that for that component, the Courthouse is in the APE, and direct effects on the Courthouse are within this APE. Also, for the L platforms, most in the immediate area are part of the APE as well because the viewshed considered those locations. But again, we will take this comment, too, and get a formal response.

Regina noted this is why we wanted to have this conversation and it's why Section 106 guides us to have this conversation. We value and appreciate your input, and we want to take another look at the things that you've suggested, which are reasonable, and in looking at some of that more in depth, I think we can have a better follow-on dialogue.

Greg moved on to the presentation on Identification of Historic Properties. We plan to have a draft report with our findings ready for GSA review in the coming weeks and then that will then get distributed to the SHPO and all the consulting parties. Consulting parties, as we've indicated, have a role in this part of the process. So today we wanted to share a preview of some preliminary findings - this information was provided in the read-aheads on Friday. Greg summarized the information previously provided and shown in the presentation, including definition of a historic property, NRHP eligibility criteria, seven aspects of integrity, and steps we've taken so far to identify historic properties. He then specified the historic properties in the APE that have been identified so far, including those that have not yet been evaluated for the NRHP that we're taking a longer look at. We're looking for any quick reactions you might have. Again, this is preliminary, but we wanted to give you that preview of what we're seeing right now.

Ward asked if all of our designated Chicago Landmarks are also highlighted within that district? I'm thinking of the Fisher building, the Monadnock, the Marquette building - those seem like they should be included. Also, little buildings like, for instance, the Engineers Building right behind the Union League Club building, which is six or eight stories. I think all of those structures should be included. I'm also wondering if the district goes to La Salle Street, do we get something like the Field building, most recently the Bank of America building, and those wonderful structures up and down La Salle Street from the Board of Trade that are landmarked. And I know this goes a little beyond the area of potential effect, but since we're talking about a potentially bigger APE, maybe it would be great to catch all of our designated Chicago landmarks in this report. Even if the APE isn't expanded, I think listing them, that you've evaluated them or

just noting that they're Chicago landmarks and they're important buildings. And by the way they've been published hundreds of times perhaps, in publications known around the world. I think that's really what's important to mention in this larger picture. All these historic buildings are all interrelated. As Cindy was saying, they're interconnected whether you're walking or if you're traveling on the L going around the Loop or if you're just thinking about the great buildings of Chicago and the great streets of Chicago, you think of all these components together. And I think that's really critical to remember as we're addressing this really sensitive issue that has gotten more interest than any other landmark building or any other building we've ever had on our most endangered list or have outreached on this. This really does touch so many people, not only in Chicago but across the nation, across the world, with the B1M video which has over 1.2 million views now, so on these two buildings, it's really important to make sure that we're really dotting all our i's and crossing all of our t's. And I also want to mention that next week you will hear that the Century and Consumers buildings are also our top Chicago 7 most endangered structures. And here's a black and white image of the poster that we're going to be circulating. This will be a poster and it will also be on the cover of our booklet that we do each year. I just wanted to share that with you, so that nobody's blindsided by the event next week.

Greg answered that we will certainly be including individual properties that have individual significance within historic districts, but I didn't want to overwhelm people with too much information. On that last slide of individual properties, I tried to focus on just the ones that aren't within an existing historic district. Greg asked if the Engineers Building was another one on Plymouth Court?

Ward answered, yes, it's right behind the Union League club. There's a number of these small buildings across from the Dirksen Federal Building that are really amazing little structures in front, if you will, to the north of the Standard Club. And then there are a number of buildings also on Plymouth Court and in and around the site that I think should be picked up as well, as I think everybody's forgotten one of the most important buildings that's red rated, that has never been landmarked and it was identified in 1956 as a really significant structure. That's the McClurg building on Wabash. It's 218 South Wabash by Holabird and Roche. So take a look at that as well.

Joe clarified that some of those areas Ward was specifically referring to are in our APE so we are capturing them.

Kandalyn Hahn (City of Chicago) sent in a question via the chat feature: "Did you make note of evaluations made in prior surveys in your field survey, e.g. "red-" and "orange-rated" buildings in the Chicago Historic Resource Survey?"

Greg responded yes, absolutely. Anytime you do a project in Chicago, the CHRS is something that's a major source of information so that is definitely something we've reviewed as part of our documentation.

Joe stated the next item on the agenda is responses to the previous meeting questions. I'm not going to read each question. What we'll do is we're focusing on the topics specific to today's agenda. We'll go through the sections we have identified as the ones we thought we would focus on - the area of potential effect, the consultation process, NEPA, funds and the Federal portfolio. We did touch on a lot of the APE questions and there were opportunities from those individuals to clarify. The security questions we won't go through because that's the next meeting. If you have additional questions or if you need those questions clarified, please use the StateStreet@gsa.gov e-mail address and we'll do our best to incorporate information for our next meeting that will focus on security. Each section has a slide. I'll take a moment to pause so if you had questions on the response provided or if you needed to clarify your original question to help us better understand the intent, we'll give you the opportunity to do so.

The first section being the area potential effects; if there was anything further on this discussion? I think we captured some of this in the earlier discussions, but just to extend the opportunity again.

There were no further APE questions.

Joe then continued to the next topic, skipping the security questions, and that takes us to the alternatives that we're also going to have at a later date. We'll touch on that in the consultation plan, but once we get through the APE, security and conditions assessment, then we'll get to adaptive reuse, other alternatives,

discussion opportunities and some innovative strategies from the parties regarding that topic. So again, if we're not going through it today, it's because we plan to have specific discussions in the future on those subjects. On structural evaluation, we talked about the conditions assessment at the overview. We will discuss the Consultation Plan later in this meeting.

No questions were raised on the Consultation Plan questions/answers.

Joe continued to Section E - the NEPA effort, which is being run concurrently. Where there any follow-on questions or clarifications regarding NEPA?

Holly posted a question in the chat: "The National Environmental Policy Act (NEPA), Procedures - 39 CFR 775.11 – Environmental impact statements – "(h) Proposals for legislation: Legislative environmental impact statements must be prepared and transmitted as follows: (1) Legislative environmental impact statement is considered part of the formal transmittal of a legislative proposal to Congress." – Doesn't this indicate that proposals for legislation are possible? What individuals (city/state/federal) were involved to get the funds appropriated by Congress to demo the buildings? What process was followed?"

Regina asked Holly to state her question.

Holly responded that to build on E .1 of the previous question, in the NEPA, under procedures for 39 CFR 775.11 Environmental impact statements, there's H, which has proposals for legislation, and that indicates that legislative environmental impacts must be prepared and transmitted as follows. Number one, there's the legislative environmental impact statement that is considered part of the formal transmittal of the legislative proposal to Congress. So question being is, doesn't this indicate that proposals for legislation are possible? And also what individuals - city, state, federal - specifically who - were involved to get the funds appropriated by Congress to demo the buildings and what process was followed. Meaning, given what this states here, aren't there possibilities to do so again? Whether that's either changing language or having something even new proposed.

Joe provided a recommendation that we'll record this question and get it reviewed by our Regional Council because some of it is the appropriations sequencing and the use of appropriations. We have a tentative answer here that we can get you something prior to our next meeting. I just want to make sure that I have a holistic answer for you on that. So we'll note this and include it in an updated log.

There were no other questions on NEPA.

Joe moved on to Congressional funding use as well as the federal portfolio being the last section. He paused for parties who had any questions or further clarifications regarding those sections.

Rob Johnson (BOMA Chicago) had a question regarding federal funding. In the longer spreadsheet regarding the funding, there seemed to be related uses, like removal of fire escapes, considered in that 52 million. Just so that I'm understanding, that 52 million only covers post-demolition landscaping but would not cover future operating expenses, or would that have to come from another source of funding for future operating expenses for whatever is put there or whatever security measures are deemed appropriate that need to take place there or general upkeep. Would that all come out of a separate budget line item?

Joe responded that the appropriation that we're referring to is the 2022 Consolidated Appropriations Act where the appropriation of 52 million was allotted to GSA specifically for funding demolition of the four properties from 202 to 220, securing adjacent properties, securing the site and landscaping. So to answer your question, the \$52 million would allow for securing the site specifically referenced in the appropriation. In terms of operating expenses for this site, that would not be allowed. For example, every two to three years, GSA does a terracotta facade inspection that comes out of our operating budget. We are not able to comingle and mix the operating funds with that specific appropriation for demolition funds. To address your point on the fire escape removal, we are allowed to use the appropriation under the umbrella term of demolition. We do have immediate needs for specifically the 202 property and the other properties that are life safety and security related, and that is the condition of the exterior fire escape and the parapet at 202. We have a separate undertaking that we're in design but utilizing the appropriation

because it qualifies under the definition of demolition. It would be the partial removal of those building elements.

Regina added that we need to keep in mind, too, that in doing that, these are life safety actions that we're looking at taking but we would still take them under and follow the Secretary of the Interior's Standards in deconstructing those elements, cataloging those elements, with the approach to be able to reinstall them for a redevelopment initiative. We're still in consultation with the State Historic Preservation Office on that. We are planning to have a meeting with the consulting parties as a whole to talk about the overall condition assessments of all the properties on the site and the specific needs for life safety measures that need to be taken, particularly at 202.

Rob followed up with, just so that I'm clear with what is proposed right now, it sounds to me, if I understand correctly, whatever is to come, and it sounds like a landscaped space right now with some security, that appropriation is TBD, right? Or it's going to be part of someone's operating expense? And I'm talking like five years, ten years down the road.

Joe clarified that these discussions are on the future of the properties and there's no record of decision on how we're proceeding with the future of this property. In the alternatives we have identified, we have adaptive reuse, no action, and demolition. If the alternative of demolition proceeded, the understanding is that the properties would be demolished, the site would be landscaped, and it would meet any security needs of the site that had the consideration of the US Marshals and FBI. An example would be potentially bollards or something that would prevent vehicles from accessing the site or things like that. The appropriation would call for that and from there, GSA would build into its operating budget the means to maintain it. That would be consistent with most of our actions, that we would plan and budget for operating of that landscaping and potentially the security system equipment that the 52 million appropriated would initially provide.

Ward wanted to remind everybody that GSA purchased these buildings over 17 years ago, and there's been numerous terracotta and inspection reports that were shared with us. Looking through those reports, we're seeing that a lot of those recommendations were never followed. Some of them were life safety issues perhaps, and some of it was as simple as caulking that wasn't followed up on even four years ago. I put together a meeting that was at the courthouse almost 10 years ago with Bob Feel and Regina Nally, and there was talk of replacing these buildings back then, and it just seems as though, from the outside, promises have been broken. In the media the acquisition of these buildings was to expand the Federal Center and to provide protection to these buildings. These two towers engage the Art Deco storefront, and it just seems that the renderings presented, the timetables, the proposals that have been presented have all been denied. It just seems as though, from our perspective, respectfully, that GSA has not really wanted to deal with these buildings in a very, very long time, more than a decade. I almost can't believe that we're talking about demolishing two world famous Chicago school buildings in the 21st century by two incredible firms that are known the world over. These buildings that were promised to be restored and reused. None of those promises have come forward, and even when there was a proposal to trade services or to build apartments, those were all denied. So we understand some of the concerns here, but you also have to understand the concerns from the general public's eye and that is that it doesn't appear that there was ever any real interest in restoring or engaging these buildings. Demolition by neglect is illegal in Chicago. These are two buildings that stand among Chicago skyscrapers that have not been repurposed or restored. These buildings really could be another Reliance Building and really have an impactful change on the South Loop. I really want to encourage a lot of sensitivity and also not forget about the last 17 years and how really, the GSA has not been a good steward of these buildings. It's really unfortunate so I want to keep that conversation and that thought alive because I think it's very important. I think we can find a resolution that's very positive, that's preservation and restoration related with a new use. But I just wanted to share that that's the feeling we're getting from a lot of people that we hear from on the street - 23,000 people on a Change.org petition - a lot of them saying that it's just really unfortunate all around.

Joe thanked Ward for his thoughts and for pointing out that perception. Over the course of the 17 years, a lot of those items you provide illustrate the timeline of our attempts to find ways to reuse these properties

for federal use as well as private use. I know on the federal side we were unsuccessful with the capital needs that presented as well as overall, regardless of capital expense, just the overall federal footprint has changed dramatically since our buildings were acquired. What we tried to capture in our response to you is that our space programs are shifting due to OMB policies on not only freezing the footprint and reducing the footprint, but even what we're seeing, not only in the federal government, but much broader in commercial real estate. You do point out correctly we did attempt a Section 412 exchange. We had challenges with developers at that time in that type of bartering for services and the inefficiencies presented on that end. And then I think many of us are aware of the disposal action and still not being able to overcome security concerns in that effort, and that situation coming to a conclusion and losing that opportunity. That's why these discussions are so important. If there is anything that we want you to leave with from this meeting, I do see these parties as the as the forum for having discussions on adaptive reuse. We have such broad and great expertise on these calls where I think we'll be able to have very engaging discussions going forward on that very subject. Our commitment is we're going to do that. And as we said at the beginning of the call, we have a few general items that are large like the APE, conditions assessment, and security to put at the forefront, and then our intention is to devote our future discussions to adaptive reuse and to really pinpoint opportunities there. So we do have serious discourse planned on that alternative. We recognize that is the alternative the consulting parties want pursued and that's how we plan to structure our upcoming calls.

Ward thanked GSA for that response and also wanted to mention that in this process, and I think this is a good process and I'm not knocking it, but I do want you to know that with everything that's been going on in our country for the last few years, people see this action on State Street, particularly the demolition of the Century and Consumers buildings, and I think they're losing faith in the GSA and aspects of our government and that's really wrenching, but I want to share that with you. We're hearing a lot of comments back and forth that this is a responsibility of the GSA for the last 17 years and these buildings have basically been ignored and mothballed and vacant. So I just want to share that. It's because of the lack of care and concern, and people feeling like these buildings are being railroaded through a process with the demolition being the outcome, which will destroy so much of the fabric of State Street, even the Federal Center and Mies's vision of how the Federal Center is entered. In the context of that, we're losing more than perhaps two or four buildings. There are people that are very interested in knowing what's behind the various remodelings of 208 and 212 and 214. 208-212 was designed by Marshall and Fox, who gave us the Drake Hotel in the Blackstone Hotel and the Edgewater Beach Hotel. I'm not sure these buildings are really intact or what their condition is behind that facade work, but if you're removing fire escapes and doing some general buttoning up of these buildings as we go through this process, it may be interesting to do some investigation as to what's underneath those facades. So I just wanted to encourage that. If it is a park that ends up on the site, I think that's a tragedy. We have a park a block and a half to the south. It's named after our governor's family and it's a failure. The city is looking at different plans to redevelop that site. Then we have block 37 that was standing empty for 20 years, not too far down State Street. I think there are some impacts that are really, really adverse or super, duper negative, for lack of a better term, with the removal of these buildings. We do believe that these buildings provide a shield to that eastern portion of the Federal Center that is where so many of the courtrooms and chambers and whatnot are, and we feel that removal may cause other impacts as well. We just wanted to share all this with you and thank you for your time today.

Joe responded that in terms of railroading the process, this process is well over a year and we're going to conduct it in good faith. We're going to try and maintain proper discussions to make sufficient progress so hopefully that's being witnessed on your end. We do get the same scoping document comments and we plan to incorporate a lot of that into our EIS, from concerns on embodied carbon on the environmental side, which isn't the Section 106 process, but also then on the cultural side with the feedback received on 202 and 220. Ward raised the other two properties and I think one of the greatest pieces of information in this log that we reviewed is the question that was asked from the City of Chicago on reviewing the properties individually, and Ward alluded to that with the four properties and that is a good reminder. We actually have four properties in discussion even though the feedback and focus is usually just on 202 and 220. We are in agreement, in the spirit of Section 106, to avoid, minimize and mitigate adverse effects. To

do that, we are going to have discussions that look at the properties individually, in part, and holistically. That might be a good way of sequencing those future meetings is maybe take some of those "low hanging fruits" like 208-212 and start discussions there. Then we can see what progress we're making, what issues are arising on those, and then get to those larger, more consequential points of concern being 202 and 220. In that endeavor, what we're still hoping is that if there are different outcomes identified by the consulting parties and agreed to, they can still be put under the umbrella of one solution, whether that's maybe one developer enacting that. That's just to share what we're thinking of on our end as we engage in those discussions.

Ward continued and wanted to mention that he was at a Chicago Park District Board meeting a week and half ago regarding a consent to landmark Promontory Point and Hyde Park. At that meeting, Pat Lavar, the CEO of the Chicago Park District, mentioned that the City of Chicago is looking for office space or being displaced from several buildings or leases are coming up. I wanted to ask GSA if the city of Chicago could be considered as a good tenant and a good fit for one or both of these buildings with the CCAC, the Chicago Collaborative Archive Center idea, or independently. I wanted to know if City of Chicago offices could perhaps occupy these buildings even if they're continually owned by the GSA, per your requirements of the 15 points that were released several months ago.

Joe stated that commercial use and office use is available. For these discussions, I don't think we have to pinpoint a specific tenant. Ideally, we would like to keep our net broad to maximize reuse opportunities. So we're not going to get into specifically if CCAC or city of Chicago are specific. I would just encourage the consulting parties to think broadly on adaptive reuse, so that if a solution is identified that allows GSA to solicit an adaptive reuse solution, we can maximize our responses and hopefully get to a solution that can be enacted. One of our main concerns is, we agree to something in these discussions and then not be able to execute on it.

Ward explained the only reason he mentioned the City of Chicago is they are another governmental agency, so he thought that could be controlled through security checkpoints and ID cards, and visitors would be thoroughly vetted or not allowed, perhaps, into these structures. But I want to know if the city of Chicago was a comparable kind of tenant to the federal government and if that would be acceptable.

Joe then wanted to address the idea of a park, because even in our discussions with the City of Chicago when we initiated our NEPA and NHPA undertaking, they raised concern with that, too, and cited the concerns you've raised on Pritzker Park. The other value of these consulting parties is, even under that alternative, you can provide feedback. It's not just under adaptive reuse; under any of the alternatives you're allowed to provide feedback. For the idea of a park, I don't think we were envisioning that either, but it's not fully defined yet. So the consulting parties can advise us through the process on what makes the most sense for the community under that alternative.

Ward pointed out that if you do indeed love the Chicago Federal Center designed by Mies van der Rohe, by removing these buildings from that site and the context, you're actually destroying part of the masterpiece. It's essentially like ripping off part of a Picasso painting or Renoir because that's how important these structures are to Mies's vision and that of Walter Hilberseimer on the planning and development of the Chicago Federal Center that honors many of these historic buildings that Mies so appreciated and looked to when he was developing his career. So just keep that in mind - that we are harming the Mies van der Rohe Federal Center as well, with the talk of demolition of these two buildings, one of which was to provide a primary entrance into the Dirksen Federal Center, THE entrance from State Street with a courtyard behind, which is oftentimes forgotten because it's now sort of an alley and parking lot.

Joe explained that's the connection we're trying to make on the APE boundary. The example just raised of the Dirksen Courthouse and studying effects to Dirksen - those immediate effects are probably going to be the most significant, more than those in the larger boundary. That was what we were trying to articulate in our presentation on the APE earlier in the meeting; we have the Dirksen Courthouse and the immediate properties, and those are going to be studied by us in the proposed APE. So we will be addressing that point in our future submissions.

Ward thanked Joe and said he just wanted to make sure we're not back in 1960 or 1970 with wholesale demolition of really important buildings and structures in Chicago because that was our archaic period.

Holly posted a question in the chat: "Is there outreach for understanding various departments needing office space?" She further elaborated by explaining the idea is shared city, state, federal with something like the CCAC or something else to go in with that mix. Having that kind of shared space among the buildings is an interesting answer and I hope to hear discussion on it. And is there outreach to, whether it's departments, agencies, or other ideas, not just the CCAC, that might have a need for those buildings, so we could kind of get together and talk.

Joe responded that GSA has not done outreach on tenants that could use those buildings at a local or state level. GSA's primary service is to provide for federal space and we do not have federal use needs for those properties. We're focusing on our current assets in proximity and utilizing our vacant space there as we're seeing a downturn in our commercial footprint. Overall our portfolio is declining in terms of our owned assets. I just want to make sure I'm encompassing local, state and federal. So that's the federal side. Local and state we've not endeavored in that side. The expectation we have is that if we find that adaptive reuse is viable in this process, and there is an opportunity to do a solicitation of an outlease in that hypothetical and to invite those parties, we would do that type of market outreach as we got closer. The one advantage that we have with the consulting parties is we have groups like BOMA with Rob Johnson on, and his chapter represents numerous components of the Chicago market. That might be an avenue that, as we collaborate together, where we can do some of that type of outreach perhaps. Not to put Rob on the spot, but if there are opportunities like that where BOMA could inform GSA of maybe interest, that would be beneficial. But we wouldn't be doing anything like that this early in our discussions.

Holly asked another question concerning structures and viability. Once we have that structural report and start thinking about viability, will we be able to bring in engineers or architects? Because we need to have an understanding of cost. For something to be viable, at what cost, right? So we'd need help bringing that into the discussion, too.

Joe explained that one of the things that GSA plans to do to assist in that discussion is to try and do most of that for you. So we are having a variety of engineers conduct the conditions assessment, covering pretty much every field of engineers from electrical to structural, assessing the conditions, as well as the architectural documenting any historical conditions on the interior, of any interior elevations of benefit, so we will have that. We will also put together a cost estimate as well. Our strategy is to release a draft of that document to, as I said at the start of the call, the ACHP and SHPO. Part of doing that is we just wanted to make sure that it didn't have unconscious bias from GSA, if that was a concern from parties. That way we can get some external input on it, finalize it and then have that issued to all the consulting parties for discussion either in April or May. To answer your question directly, it would include a cost estimate.

Regina shared that the only other thing that I would add and underscore for the understanding of this group is that GSA, as an executive agency, has a limitation in how we can utilize the monies that we have either appropriated directly for a specific use or for operating funds that support our mission to house federal agencies. And so, since we are at a juncture of our diminishing federal footprint in the Chicago market and markets across the country, we're trying our best to figure out how to best allocate those funds, and if we have properties for which we don't have the need for a federal use, we can't use those annual operating costs or even our capital costs. So that's why we're looking at the adaptive reuse as a lease opportunity so that we can provide access to external capital to help in the redevelopment of these because we don't have an authorized funding source to do that for these properties ourselves.

Discussion then moved to the Consultation Plan that had been shared in preparation for the meeting.

Regina summarized the sections of the Consultation Plan. The intent of this document is really to serve as a conceptual road map for us to follow through the consultation process to identify the goal and purpose of the undertaking and what we're trying to achieve, understanding the role of the consulting parties and how you can help inform a decision that we can make about the future of these properties that has viability and that would allow us to pursue a reuse initiative that could meet our security needs and meet the opportunities for redevelopment to make that viable financially and from a tenant perspective. We are

certainly going to have some disputes as we go forward through these discussions, and we want to try and find ways to equitably talk through those. We also need to underscore that we want to respect each other within this environment of consultation. All the groups here on this call today were invited for their specific interest in these properties or in this downtown area. We want to make sure that we keep our consultation discussions amongst ourselves and respect that. We recognize that at some point we may need to establish some subcommittees, perhaps to discuss some specific issues, maybe alternative reuse plans, maybe in regard to some segments of security, or if we get to an issue where there's some really technical investigation about something that we need to explore. We might have a few members of the larger consulting party group work with us in a smaller group to kind of talk through some of those solutions that we could then bring back to the group. Then you'll notice the schedule and milestone section lays out our schedule that's identified at this juncture for how long we think the consultation process should take to get us to a record of decision in early 2024 – January to March 2024. And then the last section is links to numerous resources that we thought folks might want to have access to if they're not necessarily in the historic preservation or construction field per se. I would like to know if you've had an opportunity to look through it. Are there any kind of initial first blush questions or clarifications that you would like to discuss about the consultation plan? I want to give folks an opportunity to talk about the concept of the plan that we're proposing and see if there are any specific topics that you would like to discuss. I think it's important to note that we see this Consultation Plan as a living document and as we're moving through our consultation process and we're peeling back more layers, there will probably be additions that we might want to add to this to further flesh some things out. If we discovered that there's something that we don't have specific guidance for. It might be talking more about what it means to solicit for a lease redevelopment, for example.

Cindy Chan Roubik (City of Chicago) posted in the chat: "Is this slide deck going to be distributed to us?"

Joe responded that we did that with the last meeting and we can send out the slides with the meeting minutes.

Cindy had one more question. We're going to focus our next meeting on the Security question topic. Are you going to have security experts on the call as well, who helped inform how you developed the criteria for the alternative adaptive reuse?

Joe answered that was correct. We have our federal stakeholders also as consulting parties on each of these calls; the US Marshalls Service and FPS are invited. They are on the call today, but we're specifically going to focus and give them an opportunity to present their statutory responsibilities, their operational security standards, and then we would then transition into the adaptive reuse criteria. It would be limited. We're not going to be able to get into too much detail on security in order to maintain those standards. But we will have the Marshalls and FPS joining us and the opportunity for them to present and engage. As I said at the start of the call, if you have questions about security during the meeting, we'll record them and follow up in writing like we've been doing. But if you have questions regarding security in advance of the meeting, if you could send that to GSA within the next week, we can do our best to incorporate that into the planning of that meeting. That might be more efficient for everyone's time if we can get a greater sense of what you're interested in on that component, then we can see how we can align that with what information we can share with you. With security, it's a bit limited. We're still in the planning stage so if you can continue to keep us in the loop on your items of concern and questions, we'll see how we can best address them.

Cindy asked if it will be a virtual meeting format like this one?

Joe confirmed that we'll continue with the virtual. When we did poll in the last meeting, most respondents said virtual worked best. I think if we get further along and we're in the adaptive reuse discussions, if we incorporate opportunities for charades or things like that to brainstorm, that may be something we try and do a hybrid or do that in person. For these discussions where it is presentation materials and engaging feedback, I think it's OK if we keep them virtual.

Cindy verified that GSA wants questions provided in the next week.

Minutes

Joe said yes. For the next topic, if you want to send any related questions for that, the subject being security, we'll review that on our end and do our best to try and incorporate that material.

Ward had another point to bring up. Five or six years ago, there were a group of us that were called to the Dirksen Federal Center to talk about security and existing fencing, and replacement of that existing fencing with ballistic security glass. I think it was Robert Peel that led that meeting. For the next meeting, could you give us a status update on that? They were supposed to be super temporary, but it's been about 5-6 years since we were all at that meeting. Also at that meeting, we were also promised once again that Century and Consumers were not threatened with demolition. I'd love to know if there's a snag and why the ballistic glass didn't go up, and why we still have all these ugly steel fences around the Federal Center. And then I just wanted to remind you again of that promise that these buildings were not going to be demolished. And that was about five or six years ago. I think Regina was in that meeting as well, as I recall.

Joe then explained that what GSA would like to do for each of you is send out a poll after this meeting with the meeting materials. It will ask you for your consulting party organization. What's your mission? What's your specific interest with this undertaking? And what's your desired outcome? Then we'll incorporate that information into the Consultation Plan. That would be great for collaboration and educational value that if the other consulting parties had a greater awareness of each other. That's the intention there and we'll be sending that out after the meeting.

Anthony Rubano (SHPO) posted a question in the chat: "Can some of the funding be used to remove the slipcovers from 208-212 and 214 S State?"

Joe explained that the conditions assessment that we are engaging in right now is not doing destructive investigation. We are not doing that level of inspection at this time. This will be primarily visual.

Regina explained they're going to be taking a lot of photographs. We can try and see if there are some of these areas that they can reach into and see if they can document some things to give us some more information. That's something we would be hopeful for. We'll explore that as they as they move forward in the condition assessments of the four buildings.

Joe said we'll follow up with our team on that and see what information we can get from the conditions assessment. If we're not able to attain that and there's interest, we can consider that.

There were no further questions.

Joe then offered an opportunity for any parties that hadn't had a chance to ask anything earlier in the presentation. He noted Chicago Loop Alliance was on as well as tribes.

No one responded with further comments.

Joe then discussed next steps, including a quick poll on scheduling our next meeting in late March, either the 29th or 30th, with a morning and afternoon option. GSA will send out the poll. Date and time will depend on the response. If we can't find a quorum, we'll send out some revised dates like we did with this meeting. Again, any questions, either on the material today or for the upcoming topic of security, e-mail our statestreet@gsa.gov address. Just as a reminder, we are underway with the conditions assessment. If it's not the April discussion, we should have the information available for dissemination so that you can be prepared for the discussion in May.

Joe concluded with noting that's all we had on our end for today. I again want to thank everyone for your participation and feedback and the dialogue. It's much appreciated and valued.

Regina concluded with thanking the tribal representatives that joined us today and noted she would follow up with them and reach out via e-mail to make sure GSA has an understanding of all your interests in the undertaking, so we can make sure to address your issues.

Thank you all. (Meeting concluded)



Minutes

Attendees (sorted alphabetically):

Bartosz Rolski – GSA
Benjamin Rhodd – THPO, Forest County Potawatomi Community
Beth Savage – GSA
Brie Martin – Franciscan Friars Archive
Bruce W. Hall – GSA
Carla Mykytiuk – Jacobs
Carol Wallace – IL SHPO
Charlie Webb – Jacobs
Charlie Young – Interactive Design
Christopher Allison – Dominican University, Chicago Collaborative Archive Center
Christopher Cody – NTHP
Cynthia Roubik – City of Chicago
Dan Snavelly – GSA, Portfolio Division
Dirk Lohan – AIA
Eiliesh Tuffy – City of Chicago, Department of Planning and Development
Elizabeth “Betsy” Merritt – NTHP
Greg Rainka – Commonwealth/Jacobs
Holly Fiedler – Franciscan Central Archive; Chicago Collaborative Archive Center
James Kim – US Marshals Service
Jeffrey Jensen – GSA
Joan Pomaranc – AIA Chicago
Joe Mulligan – GSA
John Caswell – GSA, Design and Construction
Kandalyn Hahn – City of Chicago
Kendra Parzen – Landmarks Illinois
Kevin Harrington – Mies Van der Rohe Society, Illinois Institute of Technology
LaDon Reynolds – US Marshal for Northern District of Illinois
Laura Lavernia – ACHP
Laura Rusiniak – GSA
Logan York – Deputy THPO, Miami Tribe of Oklahoma
Lori Durio Price – Jacobs
Lucrezia Patruno – GSA
Malachy McCarthy – Retired Archivist, Claretian Missionaries; Dominican University
Marc Zitzer – GSA
Mark T. Buechel – NPS
Mary Lu Seidel – Preservation Chicago
Massiel Lucca-Amador – GSA
McGarry Luginski – GSA

Michael Edwards – Chicago Loop Alliance
Michael Gonczar – GSA
Michelle Rau – Jacobs
Nicky Emery – GSA
Raphael Wahwassuck – Prairie Band of Potawatomi Nation
Regina Nally – GSA
Robert Green – GSA
Rolf Achilles – Mies van der Rohe Society, Illinois Institute of Technology
Tara Mitchell – Deputy THPO, Prairie Band of Potawatomi Nation
Thomas Bruton – US District Court for the Northern District of Illinois
Victoria Kahle – US Court of Appeals for the Seventh Circuit
Ward Miller – Preservation Chicago
Zachary Tarr – US Department of Homeland Security, Federal Protective Service

OPENING COMMENTS

Joe Mulligan (GSA) opened the meeting and welcomed attendees, including the introduction of new participants. He explained this meeting was originally planned to discuss security issues but due to new findings concerning the condition of 208-212 S. State Street, the meeting will focus on the conditions assessment, with security discussed at the next meeting. An outline of the agenda followed, including finalizing the Area of Potential Effects (APE), addressing old business, presentation of the conditions assessment for all four properties, next steps, and the current status of 208-212 S. State Street under emergency notification of NHPA.

Joe reiterated the objective of the consulting parties to adhere to the Section 106 objective of looking to avoid, minimize, or mitigate adverse effects to the subject properties, and also the working nature of the meetings with the goal being to progress the discussion and reach an agreement regarding the future of the properties. He added that as the meetings progress, the information and subject material will become increasingly more detailed in order to facilitate detailed discussion and examination of viable adaptive reuse of the buildings.

Joe closed the introduction by ensuring participants that their questions from the previous meeting regarding security issues will be addressed at the next meeting.

FINAL AREA OF POTENTIAL EFFECT (APE)

Regina Nally (GSA) led a discussion of the final APE. Regina presented the boundary of the APE and shared that GSA reviewed it, as requested at the last meeting, and concluded that no historic properties outside of the defined APE have the potential to be adversely affected. The APE was shared with the Illinois State Historic Preservation Office (SHPO) for final review and the SHPO gave their concurrence. As such, the review period for the APE is now closed and the boundary presented is the final APE. The conclusion of this step allows the consulting parties to move to the next step of identifying historic properties within the APE that could be affected by the future use of the subject properties.

Ward Miller (Preservation Chicago) asked why Van Buren Street was chosen for the boundary versus extending the APE south to Ida B. Wells Drive to encompass the Auditorium Building. Ward also asked why only part of the Historic Michigan Boulevard landmark district was included rather than the entire

district. Ward concluded by stating his disappointment that the APE was not increased in response to past discussions, then thanked the participants for allowing him to speak.

Regina thanked Ward for his comment and reiterated that the parties are following Section 106 procedure, which requires the APE to include historic properties whose character-defining features—those that qualify a property for historic status, whether it be National Register, state, or local listing—are affected by the action proposed by the government. She explained that the viewsheds from the excluded properties are not character-defining features of those properties and that the rationale for the final boundary is to encompass characteristics and environmental influences that could be affected by the undertaking, particularly those of listed properties. The entire Loop Retail Historic District was included because two of the subject properties are recognized as contributing to the district. This is also why immediate viewsheds around the properties were included. In contrast, the whole of the Michigan Boulevard Historic District would not lose its character-defining features by the loss or alteration of the State Street properties. That perspective resulted in the final APE boundary.

Ward thanked Regina for her explanation and shared additional thoughts concerning how the Loop is experienced via different forms of transportation, including the elevated train and walking, and that those experiences are also important aspects of downtown Chicago. He added that many of the excluded buildings are Chicago School of Architecture buildings. Ward stated the disappointment of Preservation Chicago that the APE was not expanded despite concern about it cutting a Chicago Landmark District in half and excluding many buildings that are part of the story of Chicago, heritage tourism in the area, and Chicago as America's architectural city. He ended by stating that Preservation Chicago understands, but very strongly disagrees.

Regina responded by providing information on National Environmental Policy Act (NEPA) consultation, which is being carried out concurrently with Section 106. It requires consideration of human condition elements in a larger area and how those aspects will be affected/what those effects are. Those will be identified in the NEPA Environmental Impact Statement (EIS).

Joe joined the discussion to provide further clarification on foot traffic and other traffic impacts, particularly in regard to a comment made by Cynthia Roubik (City of Chicago) in a previous meeting. He shared that those concerns are addressed under NEPA review because they relate to broader considerations of the environment and will be considered independent of this APE for impacts to historic properties. The discussion concluded with Joe expressing understanding of Ward's concerns and reiterating that finding a consensus will be a challenge, but that it is the goal of the meetings to reach consensus and agreement. Joe stated that he thinks due diligence has been met on this effort through the receipt and consideration of feedback, including consideration of aerial views, and that documentation will be provided with the concurrence letter to all the parties.

GSA REPORT ON EMERGENCY NEED FOR 208-212 S. STATE ST. BUILDING

Before presenting the conditions assessment, Joe provided an update on 208-212 S. State Street. In early March, GSA emailed the consulting parties regarding the sidewalk closure in front of 208-212 S. State Street. GSA is executing a conditions assessment to inform everyone involved in these discussions and attain a common understanding of the latest conditions as we examine alternatives. GSA awarded the scope of the conditions assessment in January. In early March, the AE (architect and engineer) team went into the property, 208-212, and immediately notified the GSA team of significant structural concerns that would likely result in separate collapse of that structure. This dictated the emergency closure of the sidewalk.

Regina described the emergency notifications and procedures under NHPA for this specific property. Provisions for Federal agencies to pursue emergency actions to protect life and property when conditions exist is provided under Section 800.12(b) in the regulations for the NHPA. When GSA received the information about the condition of the 208-212 S. State Street building it knew immediate action was needed to protect life and property adjacent to the structure. GSA quickly reached out to the SHPO and the Advisory Council for Historic Preservation (ACHP), as directed by the regulations, and notified them of the need to pursue emergency procedures. GSA explained the conditions of the building and shared the evaluation and assessment from the AE team. GSA asked for the information to be reviewed within seven days, as guided by the regulations, and for comments to be provided, if they had any. SHPO and ACHP responded in writing and acknowledged the need to take emergency action for this property. The ACHP recognized that this is a noncontributing building within the historic district and that the action would pose no adverse effects to historic properties. GSA is taking measures to ensure the protection of the surrounding properties and investigating how best to do that in the process of developing the plan to execute this work.

Joe said GSA has secured construction services for the demolition of 208-212 S. State Street and site preparations began today for work to remove and salvage the planters in front of the property and restore them upon completion of the scope. GSA anticipates demolition of the structure to begin in mid-April and to have a four-to-five-week duration. GSA is developing protection plans and monitors in place for adjacent properties, both in terms of water, as well as any type of motion sensors for those properties.

SLIDE PRESENTATION OF CONDITION ASSESSMENT OF ALL BUILDINGS

Joe transitioned the meeting to the conditions assessment presentation, stating that the presentation would begin with 208-212 S. State Street so that all consulting parties were aware of the current conditions and had the pertinent information to continue the Section 106 discussion. He then turned the presentation over to Charlie Young (Interactive Design).

Charlie introduced himself and shared that his firm, Interactive Design, has worked for GSA for approximately 20 years. Charlie also shared that a record of the slide deck/PowerPoint presentation would be shared with all participants.

Prior to beginning the presentation, Cynthia asked how the GSA planned to share information about the demolition with the general public.

Joe said GSA has a two-step approach for communicating information about the demolition. The first step is to issue a press release, which is currently being drafted and will be shared a week prior to the start of demolition work. Second, our construction vendor suggested adopting some local best practices, such as mailing information about the pending demolition to building and business owners in the surrounding area.

Cynthia pointed out that including an image in the press release or other communication may be helpful as it is sometimes difficult to visualize a specific property, particularly with an address range, in a text-only document.

Joe shared appreciation for the feedback and added that Alderman Riley's office has agreed to include it in their weekly newsletter as well.

Charlie then shared the scope of work for the conditions assessment. One, provide GSA with an understanding of the conditions of all four buildings at this moment in time. Two, identify what systems

and what conditions need to be repaired or remediated in order for the buildings to be reused and operational. This includes meeting code and being at a level categorized by GSA as a “warm lit shell,” which is a building that is ready to have a tenant take over and lease the space. Within that, the assessment team looked at the envelope, interiors, vertical transportation, MEP (mechanical, electrical, plumbing), hazardous materials, and environmental factors. Charlie acknowledged that while his team is not assessing historical aspects, it is part of the sensitivity of looking at everything. Historical backgrounds for the properties, particularly the two high rises (202 and 220 S. State Street), are provided by a report authored by Johnson Lasky that focuses on the buildings and sets the tone and the scope of their historical qualities.

One important aspect of the buildings’ histories shared by Charlie is that in the mid-2000s, the four buildings were shut down for safety concerns. Charlie noted the reasons for the safety concerns during his presentation. He also reiterated that the buildings have not been occupied or their systems operated for 15-plus years.

(The presentation with photographs will be provided and can be referenced for more detailed information on the condition of each building. Below are summaries of the condition of each building as shared in the presentation.)

208-212 S. State Street

This building has experienced significant deterioration due to a large roof leak. Conditions outlined in the presentation include:

- Water actively leaking into the first-story entry bay/display area
- Black mold
- Deterioration of the majority of finish materials
- Staircase from 1st to 2nd floor is in significant disrepair and leaning roughly 15-20 degrees
- 3rd floor has collapsed into 2nd floor due to water infiltration
- Due to the collapsed 3rd floor, the façade is unbraced for two stories
- All wooden framing elements are deteriorated
- Staircase to basement is not fire-rated
- Section of 1st floor has collapsed into basement
- Extensive corrosion
- Due to roof leak and subsequent deterioration of interior framing, the roof is inadequately supported and liable to collapse at any time
- Roof collapse would almost certainly cause the collapse of the façade, which may collapse toward the inside of the building or outside toward the sidewalk

Charlie/Interactive Design recommended GSA remove the building.

Kevin Harrington (Mies Van der Rohe Society, Illinois Institute of Technology) expressed dissatisfaction in the actions of the GSA to defer maintenance and general care of the building.

Joe shared that the building was not in good condition when it was purchased by the GSA and that due to unsafe conditions, it has not been accessed by the GSA in 10-plus years. He also emphasized that this is the only property that GSA is pursuing demolition of and that it is not a historically significant building.

Kandalyn Hahn (City of Chicago) asked to confirm that the building is not connected by doorways or other openings with the other buildings. Charlie confirmed that it is not.

Charlie also shared that the building is corbelled into the adjacent buildings and will require being dismantled by hand, which accounts for the four-to-five-week demolition period. He shared that other considerations are being incorporated into the demolition plan as well.

Mary Lu Seidel (Preservation Chicago) said GSA has been negligent and asked if there is a possibility of appointing a receiver as a responsible steward for the buildings until the final determination is made about their future use. She also questioned whether GSA was implementing its best practices on building maintenance and protection over the last 15 years and asked if more information could be shared about the condition of the exterior walls.

In response to Mary Lu's question about receivership, Joe responded that the current team involved in the undertaking has expressed promptness and dedication to the attention of these properties and that while the team can't speak to the history of the GSA's ownership, the team has been fully responsive. In terms of best practices on the properties, Joe commented that GSA has worked over the years to execute strategies of reuse but was unsuccessful. Meanwhile, GSA is continuing to complete maintenance activities, such as the facade inspections and repairs, with limited funds available.

Ward noted disappointment that the government let this happen on Chicago's most important street, particularly in terms of life safety risks, and questioned what would have happened without the Congressional allocation for demolition.

202 S. State Street

Charlie noted the exterior of the building appears to be in good condition from street level. Closer views, however, show deterioration and previous repairs. On the interior, a majority of materials are deteriorated but the steel structure of the building is solid. Many of the noted conditions have persisted or worsened over the past 40 to 50 years or relate to outdated mechanical equipment. Conditions outlined in the presentation include:

Exterior

- Moisture penetrating the façade has led to cracked or broken terracotta details (freeze/thaw cycle) and corroded iron anchors
- Wooden sash windows are in need of paint, sills are in average to below-average condition, various repairs and types of sealants used over time
- Inappropriate repairs such as covering elements with aluminum sheets
- Fire escape is corroded, pulling away from building, and has loose handrails (GSA plans to remove the fire escape and prohibit access)
- The roof is composed of multiple roof sections and most have punctures or ponding due to a lack of proper drainage and varied slopes
- An active leak at northwest corner of the building extends from the 16th floor (mechanical room) to the 7th floor
- Roof work is the highest priority for preserving the building

Interior

- Most interior finishes have been removed or are deteriorated
- Intact features include a staircase with a glass panel railing on the first floor and a central staircase that rises to the 16th floor (mechanical room) and is lined with stone tiles
- Sub-basement 1, part of former restaurant, has lost majority of finishes except stair, portion of column enclosure, and flooring
- Bronze elevators are all decommissioned and strapped closed

- Stair to sub-basement 2 is inaccessible due to debris
- All MEP is outdated or non-functional, must be removed and replaced
- Steel frame of building remains in great condition
- Clay tile arch floor system is in generally good condition, but iron rod support system inhibits the installation of new utilities
- Sub-basement 3 experiences ground water leaks from underground streams, a pump to remove water malfunctioned in past years and water rose 3-4 feet, repairing leak is significant
- No electricity above mezzanine level
- Plaster fallen from ceiling
- Most light and bathroom fixtures removed
- Staircase is not fire rated
- 15th floor has extensive water damage
- Wooden windows display a range of conditions
- 16th floor (mechanical room) has extensive water damage and outdated equipment
- No fire-suppression systems
- Lead paint and minimal other environmental concerns

Mark Buechel (NPS) commented on the scope of work being current conditions and future work and added a third component—the condition of the properties when purchased. Mark described this as part of the Section 106 process and stated that the effects of demolition by neglect should also be considered, including a comparison of the conditions when the buildings were purchased with current conditions. Mark emphasized the importance of this step and formally documenting it as part of this process.

Mark also brought up how the properties reached this point and how the NHPA says that a federal agency in possession of historic property is required to maintain it whether it is used or not. He suggested the involvement of ACHP lawyers.

Joe reiterated 208-212 S State Street was in poor condition when GSA purchased it. Another question was asked about facade inspections and repairs and Joe shared that they occur biannually. He also shared that there are ongoing plans while under GSA jurisdiction to address maintenance.

Regina addressed Mark's question about conditions at the time of acquisition and shared that some condition assessment was done at the time of acquisition including having Johnson Lasky Architects prepare the building preservation plans for both 202 and 220 S. State Street. Regina shared that there is photo documentation of the conditions for those properties. Joe added that Charlie mentioned some of that history at the beginning of his presentation and that the report is available to those who would like to use it to learn more about the past condition of the buildings.

Regina continued, sharing that a lot of research was done at the time of acquisition because GSA was pursuing federal use of the properties and had numerous feasibility studies completed to look at different ways to utilize them for federal tenants. Other options included infill and full rehabilitation. A study was conducted to determine the cost of new construction at the site in order to provide a baseline and better understand the cost compared to other approaches to the site. Due to this, there are documented conditions, particularly for 202 and 220 S. State Street. Since 208-212 S. State Street was never contributing to the historic district and due to its deteriorated conditions when acquired, the GSA knew it would be needed to support a viable rehabilitation of 202 S. State Street. Regina reassured the participants that the buildings were not completely neglected and that multiple protections have been put in place regarding the façades of the high-rise buildings. These occur on a regular basis to the greatest degree possible.

Regina suggested addressing questions in the chat.

Joe added that façade inspection reports are available on the GSA's public website and that the most recent reports began in 2020 and concluded in 2022.

Regina and Joe reviewed unanswered questions in the chat and responded to one submitted by Michael Edwards.

Michael asked, "Can we see the GSA maintenance records since the GSA has owned the buildings? Can these records be secured through FOIA (Freedom of Information Act)?"

Joe answered that in terms of maintenance records, GSA has the façade repair and special reports previously mentioned that are available publicly. They can also look for additional records such as original plans and provide those. Additional documents specific to maintenance can be shared as well. Joe emphasized that they have tried to proactively share documents and resources and that if the group has specific documents they'd like to see that, due to this being a Privileged Status Forum, they can be provided so that everyone has the general knowledge and awareness necessary to seek agreement on the future of the properties.

Kandilyn commented in the chat, "Please see the City of Chicago preliminary report which will lead you to the original architect's drawings for 202 S. State. Email me at Kandilyn.hahn@cityofchicago.org."

Joe stated that they are happy to receive those drawings if she would like to share them.

Holly Fiedler (Franciscan Central Archive) asked in the chat, "Can you expand upon #202 NW corner? Structural stability and what would be needed?"

Charlie answered that at the moment there is no structural problem and the frame of the building is in good shape. He shared that they are not worried about the frame or the envelope behind the façade. He admitted the floor in the NW corner does need to be looked at and will need repairs but that it has not been a long-term problem.

Ward pointed out that even though the pictures are not great, they are not much different than other buildings that have been restored, such as the Reliance Building. Ward noted the relationship between a main entry to the Dirksen Courthouse building through Quincy Court with the Consumers Building on one side and the Benson Rickson store on the other. He also expounded on the evidence of vandals in the buildings and the security concerns associated with the adjacent Federal Center.

Dirk seconded Ward's comments and expressed his shock that the buildings were allowed to deteriorate to this point. He also shared his own experience with reuse projects, including the American Furniture Mart, originally on Lakeshore Drive, from a showroom building to an apartment complex. He then referenced the Federal Center and how restoration of the buildings would recreate the vision of Mies van der Rohe when he planned the layout of the center.

220 S. State Street

The exterior of the building is clad with terracotta tiles, a majority of which are in disrepair, and will likely require a full-façade renovation. The building's steel structure, however, is intact and solid. The interior of the lower stories retains a variety of original finishes, while upper stories have been renovated to reflect

numerous tenants. All stories display loss and deterioration of finish materials. Conditions outlined in the presentation include:

Exterior

- All elevations are clad with terracotta tiles and display deterioration
- The façade and more detailed areas of the exterior have been repaired with caulk and/or mesh screens that prevent cracked and broken pieces from falling
- Damaged terracotta on side elevations has been replaced with glazed brick
- The façade of this building is deteriorating more quickly than the façade of 202 S. State Street and would likely need a complete renovation
- The roof has no active leaks but has had leaks in the past

Interior

- First floor lobby is in remarkable shape with only minimal loss of bronze elements and other alterations
- Clay tile arch floor system is in generally good condition, but iron rod support system inhibits the installation of new utilities
- c. 1990s fire alarm system, no longer functional
- Ornate interiors remain in the building though somewhat deteriorated
- Remodeled restaurant space with drop ceiling and modern materials
- Utilitarian/mechanical spaces in disrepair
- Outdated MEP
- Elevators decommissioned
- 2nd floor remodeled c. 1970/80
- Many doors have been removed
- Restrooms are small and have elevated floors that prevent ADA accessibility
- Two stairwells fit for fire egress in good condition with nice details
- Deterioration of finish materials
- Corridors in generally good shape, original layout
- Floors divided to accommodate small-scale tenants
- Various localized water leaks
- 9th floor is gutted and open, has new HVAC ducts
- Small office spaces vary from one to the next
- Violin maker's office with intact woodwork

214 S. State Street

The façade of the building is composed of a c. 1940 storefront on the first story and a large panel finished with EIFS over the second through fourth stories, both sections of which are in good condition. The building's wooden frame is also in good condition as is its interior. Additional conditions outlined in the presentation include:

Exterior

- EIFS façade, reasonably good condition
- Roof is in good condition
- Rear elevation, common brick with a fire escape
- Façade contains Art Deco-style retail windows
- c. 1940 façade window is encapsulated by current façade and rises to the 3rd story of the building
- On the 3rd story, the façade window is composed of operable steel-frame windows that are corroded

Interior

- Original millwork, curved glass, and display shelving
- Intact ceiling with recessed lighting
- Small passenger elevator, decommissioned, not ADA accessible
- Open staircase from 1st to 4th floor with winders at different levels
- Staff and utilitarian spaces are sparse and finishes are deteriorated
- Basement once connected with 220 but doors have been welded shut
- Two sets of stairs to basement
- Outdated MEP
- 2nd story has woodwork and shelving
- 3rd story had water damage in the past
- 4th story is open except for two small, paneled offices at the front

Ward commented on the condition of 220 S. State Street and shared that it was occupied until the GSA purchased it. He also reiterated vandalism of the property and the lack of stewardship while the GSA has owned the property. Ward highlighted the impact on State Street if the properties were lost and the impact on the UNESCO World Heritage site that could be established for downtown Chicago, which could bring tens of millions of tourists to Chicago. Ward concluded by stating his hopes for the consulting parties, GSA, and community to come together to correct this.

Joe reiterated the purpose of the meetings is to establish common understanding of the site, of what the criteria are, and then have discussions in the forthcoming months about solutions and opportunities.

Eilish Tuffy (City of Chicago) wrote in the chat, “From an engineering & structural standpoint – if applicable building code allowances in place for historic buildings could be achieved – what types of non-governmental uses might #202 #220 structurally support (Office? Residential? Hotel? Academic Classrooms? Etc?) or conversely – appear they would not be structurally capable of supporting?”

Charlie responded that the structure of each of the three buildings is fine. He thinks there’s going to be some issues due to it being a wood structure, the hanger system for the stair, and determining an appropriate commercial use. Charlie emphasized, however, that that would be the case whether or not the building was owned by the GSA and had to comply with GSA’s P-100, which is based on International Building Code (IBC), or with the Chicago Building code, which is also based on IBC. As for the other properties, Charlie emphasized that there are no real issues structurally and the issues can be repaired. He stated the biggest cost will be the façades and systems like the mechanical system are no longer applicable to today’s standards and energy codes and need to be replaced due to the age of the buildings. He also mentioned that many of the properties lack sprinklers and fire alarm systems and existing elevators are outdated, all of which would have to be replaced or added in any scenario.

NEXT STEPS & OPEN DISCUSSION

Joe outlined next steps including the preparation of a full conditions report that will have much more detail as well as accompanying cost estimates. The report is expected to be available to consulting parties the first week of May and is intended to assist with discussions on reuse and opportunities.

Holly commented in the chat, “For 208-212 building, I ask for every measure of care be taken for mindful demolition.”

Joe responded that GSA will be very mindful regarding demolition of 208-212 S. State Street and the surrounding properties. He also mentioned the privately-owned Berghoff property and assured participants that they will be very considerate in preparing a protection plan for adjacent properties.

Mary Lu shared that she concurred with the concerns raised by Ward and emphasized her disappointment in the federal government for purchasing the buildings, deciding they had no use for them, and then choosing not to maintain them. She further emphasized the importance of maintaining roofs and securing windows and the envelope of the building and added that there was no community engagement prior to making the decision to demolish the buildings by neglect. Mary Lu again expressed her shock at the actions of the federal government and thanked the participants for allowing her to speak.

Rolf Achilles shared that he also concurred with Ward and Mary Lu's comments. He was in the building around the time the GSA acquired it and thought it was in good condition. He said that he was amazed that the last building, 220 S. State Street, is still in that good of condition, but that overall, the neglect is just phenomenal. He then discussed the terracotta and explained that it doesn't crack on its own but rather from the inside out and is a result of neglecting the interior of the building. Rolf shared the restoration of the Wrigley Building as a prime example of restoration work. Rolf expressed that the GSA needs to own up to its neglect and the pictures of the buildings should be shared publicly. Lastly, he explained that the hanging staircase was a 19th century practice used in places where you didn't have load bearing walls and that the staircase in 214 S. State Street is a superb example of the type still being used in the late 19th/early 20th century. He then thanked the participants for allowing him to speak.

Joe reiterated the privileged status of the consulting parties and the sensitivity of the information being shared. He stated that the next discussion is about operational security standards and that the information shared in the consulting meetings is not necessarily public information but is being shared to facilitate agreement under Section 106.

Joe also shared that the next discussion will take place in late April and that GSA will send out a survey requesting preferred dates and times. He reminded everyone that his team still had the questions about security that were provided at the last meeting and thanked those who submitted questions.

Joe reiterated that he wanted to be forward-looking because a lot of what is being talked about is to establish a framework of understanding so that the parties can have productive discussions on adaptive reuse and come to an agreement. He emphasized the different insights, perspectives, and values provided by each of the participating parties and shared that starting in May the group will go through the list of historic properties identified within the APE. At that time, they will also present what authorities GSA has for reuse. Since the government seeks to retain control of the properties, information about what GSA can and cannot use them for will benefit the discussion. Joe provided long-term leasing (outleasing as the government refers to it) to a private entity(ies) as an example. He said GSA is planning to present an overview of that process and get feedback from the parties on whether it can lead to viable reuses. In June, the work will focus on adaptive reuse, and the consulting parties will take all the information gathered to determine what is viable. The GSA team is considering a charrette-style workshop where everyone convenes in person and talks about each of the properties and what makes sense in terms of avoiding, minimizing, and mitigating effects.

Regina added that participants do not need to wait until June to send comments and ideas on reuse. Sending comments prior to the meeting will allow the GSA team to have a better understanding of the breadth of opportunities potentially available and be prepared with better answers and information. Those comments can be sent to the State Street email address, which is monitored regularly.

Mary Lu commented regarding the dissemination of conditions assessment reports. She stated that as a person who used to work in the media and is familiar with FOIA, that the building condition assessment reports are public documents and representatives of the consulting parties should be allowed to distribute those.

Joe agreed and reminded the participants that some information, such as the façade reports, is publicly available, but that other information shared at these meetings is potentially sensitive and should not be shared.

Lori Price (Jacobs) suggested the consultation plan questionnaire be shared with new participants and anyone who had not filled it out yet. The link to the questionnaire was shared on the screen.

Betsy Merritt (NTHP) wrote in the chat, "We wouldn't publicize information about the location of archeological sites. Perhaps we should apply an analogous policy here to protect this information from getting into the wrong hands."

Regina agreed, stating that is why the GSA is trying to keep information within the consulting parties. Betsy agreed and thanked Regina for the information that has been shared.

Dirk asked if first time attendees will receive an invitation to future meetings and the questionnaire. Joe responded that he would be added to the distribution list as an alternate for the Mies van der Rohe Society.

ADJOURNED

Joe adjourned the meeting.



Minutes

Attendees (sorted alphabetically):

Alexander Zeier – US District Court for the Northern District of Illinois
Anthony Rubano – IL SHPO
Beth Savage – GSA
Brie Martin – Franciscan Friars Archive
Carla Mykytiuk – Jacobs
Carol Wallace – IL SHPO
Charlie Webb – Jacobs
Christopher Cody – NTHP
Christopher Koepfel - ACHP
Corina Zamora - Assistant Chief Deputy United States Marshal
Dirk Lohan – AIA
Eiliesh Tuffy – City of Chicago, Department of Planning and Development
Greg Rainka – Commonwealth/Jacobs
Holly Fiedler – Franciscan Central Archive; Chicago Collaborative Archive Center
James Kim – US Marshals Service
Jeffrey Jensen – GSA
Joan Pomaranc – AIA Chicago
Kandalyn Hahn – City of Chicago
Keira Unterzuber – Administrative Office of the U.S. Courts
Kendra Parzen – Landmarks Illinois
LaDon Reynolds – US Marshals Service
Laura Lavernia – ACHP
Laura Rusiniak – GSA
Lori Durio Price – Jacobs
Malachy McCarthy – Retired Archivist, Claretian Missionaries; Dominican University
Marc Zitzer – GSA
Mark T. Buechel – NPS
Mary Lu Seidel – Preservation Chicago
Michael Woods-Hawkins – US Marshals Service
Michael Gonczar – GSA
Michelle Rau – Jacobs
Naima Prince - GSA
Nicky Emery – GSA
Kevin Harrington – Mies Van der Rohe Society, Illinois Institute of Technology
Raphael Wahwassuck – Prairie Band of Potawatomi Nation
Chief Judge Rebecca Pallmeyer - US District Court for the Northern District of Illinois
Regina Nally – GSA
Robert Green – GSA
Rob Johnson – Building Owners and Managers Association of Chicago



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Rolf Achilles – Mies van der Rohe Society, Illinois Institute of Technology

Sarah Schrup – Circuit Executive, U.S. Courts of Appeals

Susan Tiger – Kickapoo Tribe of Oklahoma

Tara Mitchell – Deputy THPO, Prairie Band of Potawatomi Nation

Thomas Bruton – US District Court for the Northern District of Illinois

Traci Murray – US District Court for the Northern District of Illinois

Victoria Kahle – US Court of Appeals for the Seventh Circuit

Ward Miller – Preservation Chicago

Zachary Tarr – US Department of Homeland Security, Federal Protective Service

Carla Mykytiuk (Jacobs) opened the meeting and gave an overview of “housekeeping” items. She reminded the participants that Section 106 Consulting Parties have privileged status and information presented should not be shared outside of the invited parties.

She then turned the presentation over to Regina Nally (GSA) who welcomed attendees to the meeting. Regina opened by sharing that the meeting would cover security concerns at the four properties and how they relate to the security needs of the Dirksen Courthouse. She also referred to information sent out before the meeting that addressed previously submitted questions and explained that an attempt was made to fully address each question, but that because of security concerns not all questions could be answered completely. Additionally, Regina asked that participants submit any follow up questions through the chat or to the State Street email address so they could be better understood and reviewed by security officials before being answered.

Regina turned the presentation over to Lori Price (Jacobs) who shared that the next meeting will focus on the identification of historic properties within the APE. Commonwealth Heritage Group has been preparing survey reports for both archaeology and architecture and once those are finalized, they will be shared with the consulting parties, as will the final conditions report including cost estimates. The next meeting will also cover the contracting options available to GSA for the adaptive re-use of the properties.

Regina then introduced the federal law enforcement partners involved in the project beginning with Zachary Tarr, who is the deputy regional director for the Great Lakes Region of the Federal Protective Service (FPS), part of the US Department of Homeland Security. Zachary explained that the mission of the FPS is to protect federal facilities and the people in them. This includes all properties owned, leased, and secured by the federal government. The FPS consists of over 15,000 employees and contractors including uniformed law enforcement officers, explosive detection canine teams, criminal investigators, training and support staff, and contracted security officers and dispatchers. In addition to responding to incidents in real time, the FPS also evaluates incidents afterward to develop new ways to protect federal facilities as well as to predict threats. The agency’s overall goal is to increase the level of protection of federal facilities to a point where there are zero occurrences of crime because the facilities are so well protected.

FPS uses a four-layer approach:

Interior – inside the building, includes video surveillance, alarm systems, armed guards.

Envelope – exterior wall, windows, doors, roofs, includes security screening at entrances (X-ray), FPS/PSO patrol, surveillance.



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Perimeter – on the periphery of federal facility inclusive of sidewalks, parking areas, and any attached spaces. Protective measures include barriers/bollards, VSS-surveillance, FPS/PSO patrol, security and threat assessment reports.

Buffer Zone – outside of the federal facility and tailored in size to each specific facility. Protective measures include surveillance/counter-surveillance, threat investigations, state and local law enforcement.

Zachary explained that for some facilities, such as those in a city like Chicago, a mile buffer may be more than enough to monitor activity around the facility. In areas like Montana, however, where the land is open and facilities are exposed from multiple directions, a much larger buffer may be necessary.

Next, Regina introduced LaDon Reynolds who is the U.S. Marshal for the Northern District of Illinois. LaDon shared that the U.S. Marshal Service (USMS) was established in 1789 and is the oldest federal law enforcement agency in the country. He shared that the mission of the USMS is to enforce federal laws and provide support to virtually all elements of the federal justice system by providing for the security of federal court facilities and the safety of judges, other court personnel, and visitors. LaDon also shared the congressional mandate (28 USC § 566) that outlines the role and power of USMS. After this, LaDon talked about some of the unprecedented changes that affect security today such as technology and its ever-increasing advancement. He also shared how security needs have risen in past years, citing an 89 percent increase in security incidents involving USMS-protected officials from FY 2016 to FY 2019 and a roughly 233 percent increase from FY 2008. Additionally, in 2020, more than 50 courthouses were damaged, and two security employees were shot, one fatally. In the past year, there have been planned attacks on supreme court justices as well.

LaDon outlined the number of federal personnel protected by the USMS, roughly 2,700 federal judges and over 30,000 federal prosecutors, the Deputy Attorney General, the Secretary of Education, and U.S. Attorneys as well as the immediate family members of federal judiciary officials, and he specified that their protective measures extend outside federal facilities and courthouses. In the case of the Dirksen Courthouse, the USMS is responsible for all security inside the courthouse and the immediate area outside of the courthouse.

LaDon clarified that the USMS has no opinion on the outcome of the Section 106 process as long as the 15 adaptive reuse requirements are met and the USMS is able to carry out its duty of protecting the lives of the judiciary, court personnel, and anyone else who visits the courthouse.

Lori thanked the presenters and then took a moment to remind the consulting parties that the initial purchase of the subject buildings was to satisfy three objectives, one of which was to increase the perimeter security of the courthouse. The others were to provide for future expansion needs at the Chicago Federal Center and to reduce the federal government's dependence on leasing as a way to meet space requirements. Funding for purchasing the buildings was approved in 2005 and the buildings were purchased in 2007. An original justification for the approval and subsequent purchase was that it would "allow GSA to create a buffer zone integral to the security of the courthouse," much like the buffer zone discussed by Zachary. Zachary chimed in and pointed out how the graphic from the slide presentation was a great example of the layers of security around the courthouse. He identified Adams, Jackson, and the plaza adjacent to Quincy Court as the perimeter of the courthouse property but went on to discuss the federal buildings as a unit including the Chicago Federal Center, the Metcalfe Building, and the federal offices housed in the Benson and Rixon Building and the Bond Store Building. All of these buildings are



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within the buffer of the courthouse. So, from an overhead view, there is a lot of federal interest in the buffer zone around the State Street buildings.

Lori also pointed out that when the acquisition of the buildings was being considered, another justification was that it would increase security by eliminating the possibility of private sector development proximate to the courthouse. In other words, if someone were to privately develop this area, the GSA would lose any control it may have had over the use of the properties and the effects of that use on the security of the federal buildings. She went on to point out that the other two reasons for acquiring the buildings—future growth and reducing dependence on leasing—are no longer relevant, but the perimeter security needs of the courthouse have increased due to the increase in incidents involving the U.S. judiciary as noted by LaDon.

Next, Lori spoke about the historic significance of the Dirksen Courthouse for its architecture and its association with Mies van der Rohe and how actions taken to secure the building must also take into consideration potential effects to the building's character-defining features. Furthermore, the GSA must strive to avoid or minimize any adverse effects to the courthouse that result from any changes, even those that are security related. She pointed out that some security measures have been incorporated in the past—perimeter bollards, various technologies, and operational protocols—and that security assessments are ongoing.

Following this, Regina introduced Tom Bruton, the Clerk of Court for the U.S. District Court for the Northern District of Illinois. Tom began his presentation by talking about his role as the primary point of contact at the Dirksen Courthouse, its day-to-day operations, and in particular, how it differs from other federal courthouses.

Tom pointed out a variety of ways that the Dirksen Courthouse differs from other federal courthouses around the country.

- The Northern Illinois District Court is the third largest district court in the country with 22 district judges appointed by the President, 10 senior judges, and 14 magistrate judges.
- The Dirksen Courthouse has over 1.4 million gross square feet and is the largest federal courthouse in the country.
- It is the only federal courthouse in the country where all the courts—circuit court, bankruptcy court, district court, and the U.S. Attorney's Office—are housed together. In many other cases, these courts are housed in separate, smaller buildings.

Tom also pointed out that security concerns at the courthouse are not just concerns but real issues and that indictments and crimes against individuals who work at the courthouse have occurred. He informed the participants that he and the Chief Judge have safety as their utmost concern daily. He then shared reasons why securing the Dirksen Courthouse is more challenging than other federal buildings and courthouses.

- The courthouse runs a 24/7 operation with the potential for Assistant U.S. Attorneys, emergency judges, and duty magistrate judges on the premises and hearing urgent cases at all hours.
- A high number of individuals enter the building daily:
 - Approximately 1,200 federal employees
 - Approximately 2,000 visitors – case participants, attorneys, people being naturalized for citizenship and their families



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- Cases tried at the courthouse include:
 - Civil and criminal cases from slip and fall to EEOC cases, and criminal indictment
 - Grand juries meet daily
 - Petit jury trials happen each day

Tom then shared a list of significant court cases with safety/security concerns that were tried at the Dirksen Courthouse. He highlighted one case from each category. Those highlighted include:

Terror Related Cases (Domestic & International)

US v. Kashmiri, et al., 09-CR-830 - Providing Material Support to Terrorists

- Multi-defendant trial involved with the Mumbai India bombing in 2008.

Drug Cartel & Organized Crime Cases

US v. Joaquin Guzman-Loera ("El Chapo"), et al., 09-CR-383 Cases - Drug Trafficking with Intent to Distribute, Conspiracy Association, Organized Crime Against Health, Money Laundering, Homicide, Illegal Possession of Firearms, Kidnapping, and Murder

- El Chapo was tried in the southern district of New York, but all of his codefendants were tried at the Dirksen Courthouse.

Street Gang Cases & Crimes of Violence

US v. Murphy, Darius & Morgan 19-CR-641 - Attempted Murder, Racketeering, and Kidnapping

- Lengthy jury trial that recently concluded at the courthouse. The defendant and his coconspirators were charged with murder for hire, including two fatal shootings, and 12 murders.

Notable Cases

US v. Nettles 04-cr-00699 - Possess Explosives on Federal Property

- Nettles was convicted of a non-violent crime and incarcerated. While incarcerated, he decided to use a truck bomb to blow up the Dirksen Courthouse and attempted to do so once released.

Regina thanked Tom for his input and turned the presentation over to Lori to talk about the "15 Viable Reuse Criteria" and how they relate to the reuse of 202-220 S State Street. Lori explained that the criteria were developed through a joint effort of the federal law enforcement partners after reviewing all of the security reports and assessments conducted for the courthouse and taking into consideration the challenges discussed today and other current or known security risks. These criteria were first used when GSA was planning to dispose of the buildings. Lori pointed out that previous proposals for the buildings failed because they could not satisfy the 15 criteria. She clarified that all 15 criteria apply to private development of the buildings, but some do not apply to government use of the buildings. Regina further clarified that federal government use for the buildings has been explored, but no use was identified. For this reason, when talking about government use of the buildings, the use will likely come from a state, municipal, or county government entity. While one of these would be the best fit for security purposes, the GSA is open to exploring as many opportunities as possible.

Lori asked Carla to share the link to the Notice of Intent (NOI) in the chat. The NOI lists the 15 criteria - <https://www.federalregister.gov/documents/2022/11/01/2022-23721/notice-of-intent-to-prepare-an-environmental-impact-statement-and-initiate-section-106-consultation>.

Lori reminded participants that previously submitted questions were answered in the read-ahead document provided before the meeting. She noted that no questions had been submitted during the



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meeting in the chat and welcomed participants to either submit questions via the chat now or via email at StateStreet@gsa.gov. These questions will be shared with the federal law enforcement partners and answered in a similar fashion as the last round of questions.

Lori then addressed upcoming meetings.

May Meeting:

- Presentation of Archaeological Report and Historic and Architectural Resources Survey Report
- GSA Contracting Options/Out-leasing as well as ideas that may be more familiar to developers or real estate professionals and not yet considered by the GSA

June Meeting:

- Evaluating viable re-use options and other alternatives

July Meeting:

- Continue evaluating viable re-use options, potentially via an in-person charrette-style workshop

Lori reminded participants that a charrette is a meeting where all the stakeholders get together and try to work out solutions. It is a design based participatory process where in a short period of time, i.e., three hours, a group meets and works on the issue. A charrette is meant to be a collaborative design session where everybody gets together to work on solutions proposed, some different options, and just throw out ideas.

Lori noted that it will be challenging to do in this online forum since no one can really interact—draw things out, throw out ideas, etc.—so GSA is considering making the July meeting an in-person, charrette-type meeting where the consulting parties can work through some of the adaptive reuse options that GSA is hoping people come up with by the June meeting.

Regina addressed comments shared in the chat. Mary Lu Seidel (Preservation Chicago) asked: I would like to hear an assessment of the threat for the other commercial, private tall buildings to the north and northwest of the federal courthouse. How does that differ from the subject properties?

Regina pointed out that the question was addressed in the read-ahead document and added that if she would like more specific/nuanced information, she is welcome to send it to the email address and the law enforcement partners will take a look at it.

After reviewing other questions in the chat, Regina emphasized that GSA must be very mindful of sending questions through the vetting process (consulting with law enforcement partners) and putting adequate thought into questions as well as the ramifications of the security information being shared before providing an overview or quick answer. This process will allow for questions to be answered fully and more accurately. Regina also referred to the upcoming meetings and how more information will continue to be shared, particularly as new ideas are proposed and the security of those ideas evaluated.

Another question was posed in the chat by Laura Lavernia (ACHP): Can any of the esteemed guests explain the line-of-sight argument?

LaDon asked for further clarification on the question and Laura clarified that she was curious about the line-of-sight issues brought up in other meetings, particularly the line-of-sight from other buildings and in general what the concerns are. LaDon responded that they would review the question further in order to



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give a more comprehensive answer as he was not sure about what he could and could not share in this setting.

Ward Miller (Preservation Chicago) asked in the chat: So, would the GSA be a partner in future reuses of the 202 and 220 buildings, as they would potentially be leased? It sounds like that would be the case. Security would always be a great concern to us all, but it appears that the general public is potentially at risk for all of the threats noted in today's presentation and wondering if the courts should potentially be relocated to a more remote area of our City?

Regina responded that they would follow up on Ward's question in writing.

Regina noted a question in the chat from Kendra Parzen (Landmarks Illinois): If what is allowable for adjacent properties varies based on who owns the building – federal government vs. private – then the meaningful variable is ownership and not simply security. Uses that are allowable under private ownership become prohibited with federal government ownership and control. Shouldn't the "security" impacts of an adjacent property be analyzed independent of who owns it?

Regina responded that they would follow up on the question in writing and also added that government ownership of the properties is key to the future use of the buildings and what the GSA is focusing on.

Ward stated in the chat: We are also concerned about the published costs of the demolition of the 208-212 building at over \$3 million dollars, which appears to be excessive. Will the costs for reuse of the 202 and 220 buildings also be so inflated? This is of concern also to many of us and perhaps they can be based or compared on the former reuse proposals for these buildings or similar buildings that have been recently restored?

Regina responded that they will provide cost estimates in the final conditions assessment report in May along with cost estimates for remediation and failed systems in the building. These will serve as a baseline cost estimate for rehabilitating the buildings. Regina also shared that they would take a second look at Ward's question and provide a written answer as well.

The next question in the chat was provided by Kandalyn Hahn (City of Chicago): If the adjacent structures are federally (edited) owned, are they all out-lease arrangements for the private uses? They appear to include retail, hotel, etc. What is the full scope of those uses?

Regina responded that the group will try to define that together at the following meetings. Those meetings should also provide a better understanding of the opportunities and limitations of what they are allowed to do when out-leasing or leasing to non-federal entities. This information will be provided by other GSA personnel who can share more about how that activity is executed.

Regina then asked if there was anything additional that the presenters wanted to add before concluding the meeting.

Tom thanked everyone for their participation today.

Regina reminded the participants about submitting questions. Lori reminded them that before the next meeting everyone would receive the survey reports, conditions assessment report, and potential dates for the May meeting.



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Regina thanked everyone for allowing the presenters to talk about security issues and concerns and adjourned the meeting.



Minutes

Attendees (sorted alphabetically):

Angela Miklich – GSA
Anna Krupka – GSA
Anthony Rubano – IL SHPO
Beth Savage – GSA
Betsy Merritt – NTHP
Brad White – Consulting as an Individual
Brian J. Tye – GSA
Brie Martin – Franciscan Friars Archive
Burgundy Fletcher – Peoria Tribe
Carla Mykytiuk – Jacobs
Carol Wallace – IL SHPO
Charlie Webb – Jacobs
Cindy Roubik – City of Chicago
Dirk Lohan – AIA
Elena Papadakos - NTHP
Eiliesh Tuffy – City of Chicago, Department of Planning and Development
Frank Butterfield – Landmarks Illinois
Greg Rainka – Commonwealth/Jacobs
Holly Fiedler – Franciscan Central Archive; Chicago Collaborative Archive Center
Jeffrey Jensen – GSA
Jennifer Styzek - GSA
Joan Pomaranc – AIA Chicago
Joe Mulligan - GSA
Kandalyn Hahn – City of Chicago
Keira Unterzuber – Administrative Office of the U.S. Courts
Kelly Yasaitis Fanizzo – ACHP
Kendra Parzen – Landmarks Illinois
Kevin Harrington – Mies Van der Rohe Society, Illinois Institute of Technology
Kristen Smith – GSA
LaDon Reynolds – Chief Marshal, USMS, Northern District of Illinois
Laura Lavernia – ACHP
Logan York – Miami Nation
Lori Durio Price – Jacobs
Lucrezia Patruno – GSA
McGarry Luginski – GSA
Malachy McCarthy – Retired Archivist, Claretian Missionaries; Dominican University
Mark T. Buechel – NPS
Mary Lu Seidel – Preservation Chicago
Megan Funk – Commonwealth/Jacobs
Michael Finn - GSA



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Michael Gombosi – US Courts

Michelle Rau – Jacobs

Naima Prince - GSA

Nicky Emery – GSA

Randall Harrington – 42nd Ward

Rebecca R. Pallmeyer – Chief Judge, Northern District of Illinois

Robert Green – GSA

Rob Johnson – Building Owners and Managers Association of Chicago

Rolf Achilles – Mies van der Rohe Society, Illinois Institute of Technology

Steve Kuchera – GSA

Susan Tiger – Kickapoo Tribe of Oklahoma

Tara Mitchell – Deputy THPO, Prairie Band of Potawatomi Nation

Tom Bruton – Northern District of Illinois, Clerk of Court

Victoria Kahle – US Court of Appeals for the Seventh Circuit

Ward Miller – Preservation Chicago

Zachary Tarr – US Department of Homeland Security, Federal Protective Service

Joe Mulligan (GSA) opened the meeting and recognized new participant Brad White. Brad is head of the Built Environment program at the Driehaus Foundation but is participating in the consulting party meetings as an individual. Previously, Brad was appointed to the ACHP by President Obama as a public member and served from 2011-2020. He is also a former chair of Landmarks Illinois and Preservation Action.

Next, Joe introduced Nicky Emery, who is the Regional Preservation Architect for the GSA. Nicky shared that though she has not led any of the consulting parties meetings, she has been working behind the scenes as part of the GSA's team.

Joe then explained that up until now the GSA has been sharing its knowledge of the properties, security concerns, and reuse requirements, etc., to ensure all the consulting parties are on the same page before the consultation process transitions to strategies for reuse and collaboratively working through those strategies to ensure they are viable. Joe introduced the material that will be discussed in this meeting:

- GSA's authority on reuse, specifically outleasing for private development; and
- The identification of historic properties in the area of potential effects. Nicky added that toward the end of the meeting she will present some homework for the participants to take back to their respective groups and/or think over individually after the meeting concludes. The homework is intended as a precursor to the charette discussions.

Carla shared the housekeeping policies and reiterated the privileged nature of being a Section 106 consulting party and the importance of keeping shared information within the consultation group.

Brian Tye, who works in the Portfolio Strategic Analysis Group of Central Office of GSA and is the Outleasing Program Manager, presented information on "Adaptive Reuse Outleasing using Section 111 of the National Historic Preservation Act (NHPA)". Brian highlighted a section of the legislation that gives GSA, in his words, "broad authority to outlease space in historic buildings," and according to Section 111, "that are not needed for current or projected agency purposes." Brian shared that GSA uses this authority for two types of outleases: 1. Full-building ground lease, which may be adaptive reuse projects; and 2.



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Partial-building outlease. His presentation focused on full-building ground leases for the State Street properties. Brian then provided an overview of the ground lease contract structure. Under this contract type, a tenant can redevelop a property during the lease period, and after the lease period the development/operation of the property is returned to the property owner (GSA). Brian emphasized that this lease type does not allow the developer to sell the building at the end of their investment period. As a result, these leases typically span from 50 to 99 years in order to give the developer time to recoup their investment in the property. In exchange, this lease type allows GSA to control the use and development of the property (without the financial investment).

Brian explained that payment or consideration of ground leases can come in two forms: 1. In-kind, such as improvements to the property; and 2. Rent. For GSA, in-kind contributions in the form of property improvements often play a large role in the structure of leases due to significant backlogs of deferred maintenance and repairs. These leases often incorporate rent as well, but at an amount adjusted to account for the in-kind contribution. Brian pointed out that because Section 111 does not dictate the use of the space, the government can consider all alternatives that align with the 15 security criteria for the State Street buildings (discussed in past meetings), preserve the asset, have long-term economic viability and cash flow—in order to fund repairs and pay rent, and comply with local planning.

Brian then shared two examples of historic properties owned by GSA that were outleased as whole buildings and adaptively reused.

First, Brian presented the Old Post Office. This property is at 1100 Pennsylvania Avenue in Washington, DC and is currently under the brand Waldorf Astoria and operated as a luxury hotel. It is listed on the National Register of Historic Places (NRHP) and is a contributing property to the Pennsylvania Avenue National Historic Site (NHS). The building was used as the city's primary post office until 1914 and afterward as a federal office building. Over time, the government was not able to keep up with building repairs and the configuration of the space was no longer conducive for offices. Through congressional legislation, GSA repositioned the asset. GSA utilized a competitive selection process and the Trump Organization was selected to convert the building to a hotel under a 60-year, adaptive-reuse, ground lease. The Trump Organization completed \$200 million in renovations which included 272 hotel rooms, restaurants, a large spa, conference and ballroom facilities. The Trump Organization was eligible for \$40 million in historic tax credits based on the qualifying expenses of the project. Following the renovation, the Trump Organization was replaced by Waldorf Astoria, who assumed all maintenance and preservation responsibilities for the duration of the lease.

Brian shared that, like other retail, hotel, restaurant-type outleases, the key terms of this lease include flexible rent, which helps to share investment risk between the tenant (developer) and owner (GSA). This is composed of 1. base rent; and 2. a percentage rent for food and beverage. The sale of the outlease was also accounted for in the terms of the outlease via an approval clause that allowed the Trump Organization to sell the lease with the GSA's approval. Additionally, the project included a programmatic agreement between GSA, DC Historic Preservation Office, National Capital Planning Committee, National Park Service, and the tenant to ensure there are no adverse effects to the property due to initial and subsequent alterations.

During Brian's presentation, Cindy Roubik (City of Chicago) asked if this example is next to a federal courthouse. Joe answered that it is not next to a federal courthouse, but adjacent to the IRS headquarters. Anthony Rubano (Illinois SHPO) asked, "Are there GSA outleases that also have security restrictions that this undertaking has?" Brian responded that the process of negotiating a ground lease gives the GSA the ability to determine the long-term use of the building. Brian then moved on to the



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second example, the Tariff Commission Building, which was converted into a Hotel Monaco. Brian explained that many uses were considered for the property and emphasized that a benefit of ground leases is that GSA can define the types of uses that are acceptable and that the GSA retains control of the building. He further explained that security requirements can be incorporated in leases, but that he didn't have any specific details about adaptations made to the example buildings to accommodate security requirements.

He again emphasized how GSA retaining ownership of a building allows them to control how the ground lease is structured and to incorporate any security concerns that can be mitigated.

Brian shared that the Tariff Commission Building was also developed as a luxury hotel with a 60-year ground lease and that it is located at 700 F Street NW in Washington, DC. Brian shared that it is considered by GSA to be the fourth most historic building in Washington, DC, was designated a National Historic Landmark (NHL) in 1971 and was the first structure in DC to be constructed completely of marble. It was used from 1839 to 1996 for federal office space before falling into disrepair.

Brian explained how, similar to the Old Post Office, GSA utilized a competitive selection process. Unlike the Old Post Office, where a hotel was already identified as the highest and best use, GSA chose to entertain different uses for this building. Again, however, a hotel developer, Kimpton Group, was selected to develop the building. In 2002, a \$37 million renovation was completed. The Kimpton Group received historic tax credits in the amount of around \$5 million, equal to 20 percent of the \$25 million in qualifying renovations they completed. Like the Old Post Office, the tenant is responsible for maintenance and preservation of the building under the 60-year ground lease. The ground lease also had a flexible rent structure that included base rent and a percentage of food and beverage and had an approval clause that allowed, with GSA approval, for the property to be assigned to a new tenant, and in 2014, IHG assumed the ground lease.

Brian then shared some other types of outleasing GSA has done, specifically partial building outleases. These include the Lipinski building in Chicago, which has a master outlease on the first floor. A master outlease allows a developer to lease the entire first floor and then sublease the retail spaces within it to different users. He explained that in the case of the State Street properties, a developer could outlease the entire building and then sublease spaces to other tenants. Another example was the New Orleans Custom House, which was home to the Audubon Insectarium, and was also a first floor outlease. Lastly, Brian shared the Green Berries Coffee Shop, which outleases a retail/restaurant space on the first floor of the GSA headquarters at 1800 F Street in Washington DC.

In conclusion, Brian shared two slides with graphs representing current market conditions for office space in the Central Loop submarket. The first graph showed decreased demand for office space and increased vacancy. Additional metrics on the slide included a slight decrease in the amount of office space available, likely due to the conversion of some office space to residential or other uses; zero new construction of office space; a migration of tenants out of office space, and a vacancy rate of 20.4 percent. The second slide/graph showed increased vacancy rates over the next two years, flattening out over the subsequent two years, and decreased but relatively flat rental rates over the same period.

Brian's last slide outlined how GSA approaches outleases. The first step includes engaging the market through a request for information (RFI) in order to gauge interest, explore uses, and determine financial viability. Should GSA select adaptive reuse in its Record of Decision, GSA would proceed with issuing a Request for Proposal for an outlease. GSA would then use "best value source selection procedures", which look at cost and technical factors, to select an outleasee/developer for the space.



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Kevin Harrington asked if the DOJ and FBI are across 10th Street from the Waldorf Astoria, as those entities seem equivalent to the federal courthouse that is adjacent to the State Street buildings. Brian responded that he was unaware of the proximity of agencies but that he could find that information and share it.

Kendra Parzen (Preservation Illinois) asked if there are examples of partial ground leases that are located near the federal courthouse. Joe shared that GSA does have partial ground leases in buildings adjacent to the Dirksen Courthouse. This includes the 7-Eleven and additional retail along Jackson Boulevard and south of Quincy Court. Brian added that the Moakley Courthouse in Boston has a ground floor restaurant and that he can do some additional research to identify other examples in or near courthouses.

In reference to a question from Brad about what major uses are eliminated based on the 15 security criteria, and in particular, why residential and lodging uses are not options, Joe said their team would reach out directly to him since that material was discussed in previous meetings.

Anthony Rubano asked if the 7-Eleven on State Street subject to similar security requirements? Joe answered that they were not documented but that he believes they align with the requirements. For example, loading/unloading occurs on Jackson Boulevard and the building does not have sightlines to the Dirksen Courthouse, or have residential use. Joe noted that this was true of other properties on the south side of the site as well. Then, Anthony asked if the 7-11 had a 24 hour guard. GSA will review and respond in an updated question log.

Megan Funk, an architectural historian with Commonwealth Heritage Group, and Lori Price with Jacobs presented the identification of historic properties.

Lori began with a recap of the Section 106 process and how it directs the federal agency to identify potential historic properties in the area of potential effects (APE), which was discussed in earlier meetings. She explained that Commonwealth surveyed the buildings in the APE and identified potential historic properties that could be affected by the undertaking. After identifying these properties, potential effects to the properties caused by each of the three alternatives were assessed. Lori stated that the PowerPoint and a map showing the location of the properties within the APE would be provided after the meeting. She added that the July meeting will provide an opportunity for a more detailed discussion of the information. After that meeting, feedback will be incorporated into a report that will be shared with the consulting parties as well as the Illinois SHPO as part of a formal request for concurrence on the identified properties and the finding of effects. Lori reiterated that these are GSA's preliminary findings and invited participants to ask questions in the chat or send them to the State Street email address so they can be discussed at the next meeting.

Megan provided the Section 106 definition of a historic property, which is "any district, site, building structure or object included in or eligible for inclusion in the National Register of Historic Places." She then explained that four criteria and seven aspects of integrity are used to determine if a property is eligible for inclusion in the NRHP. The criteria include A, event; B, person; C, design; and D, information potential and relate to whether or not a property is related to a specific event or period of time that is significant to the country, state, or even a small community or group; if it is related to a person of historical significance; if it displays outstanding architectural design or engineering; and if it possesses the potential to yield new historic or prehistoric information.



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Megan outlined the seven aspects of integrity that include location, design, setting, materials, workmanship, feeling, and association and explained that they are used to determine if a property still embodies its significance. She then provided examples of the questions one might ask in assessing a property for integrity, such as, “has the property been moved from its original location or has its setting changed?” “Does it retain its original materials and workmanship?” and, “does it still convey its association with the event, person or construction method or architectural style that made it significant?” Lastly, she mentioned Criteria Consideration G, which is used to evaluate resources less than 50 years old for exceptional significance.

Megan summarized the potential for archaeological resources in the area, sharing some background on the development of Chicago’s built environment. This included raising structures in the mid-nineteenth century in response to flooding and removing or infilling with debris following the Great Chicago Fire. She explained that though construction of the current buildings, particularly the multi-level basements of 202 and 220 South State Street, disturbed the ground below them, there is still some potential for intact archaeological resources, such as the foundations of pre-1870 buildings constructed before the ground level was raised.

Megan showed a slide with the APE and the NRHP, NHL, and determined-eligible historic districts that overlap with or are entirely within its boundary. She explained how the architectural survey looked at all 163 buildings in the APE to confirm if historic buildings were still extant and retained integrity and if any unevaluated buildings were potentially eligible. She provided a tally of the resources within the Loop Retail Historic District, which comprises most of the APE; within the remaining historic districts; and outside of the historic districts.

Loop Retail Historic District

- 109 total resources
- 75 resources that contribute to the historic district
- 9 resources individually listed in the NRHP
- 4 resources individually listed as NHLs

Additional Historic Districts

- 31 total resources
- 28 resources that contribute to a historic district
- 8 resources individually listed in the NRHP
- 3 resources individually listed as NHLs

Outside of Historic Districts

- 24 total resources
- 1 resource individually listed in the NRHP
- 3 resources previously determined eligible for the NRHP
- 10 resources determined eligible for the NRHP as a result of this survey

Megan reviewed the resources outside of a historic district. Those with previous NRHP determinations include the NRHP-listed Chapin and Gore Building and three determined eligible buildings - 33 West Jackson Boulevard, the Union League Club of Chicago, and the “L”. Then she highlighted the buildings outside of the historic districts that had no previous determinations. Of these, eight properties were identified as eligible for the NRHP under Criteria A, B, and C. They include the Italian Village restaurant, Mid Continental Plaza, Chicago Engineers Club, Standard Club, City Club, Sears Building, Continental Center II, and Big Red/Continental Center III. Two properties were also presented as eligible for the purposes of the undertaking due to their potential to reach 50 years of age before the undertaking is completed. These are 55 W Monroe, which was designed by Helmut Jahn and constructed between 1977 and 1980, and 33 W Monroe which was designed by the architecture firm Skidmore, Owings & Merrill and



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constructed in 1980 to serve as their headquarters. Megan stated that the buildings that were identified as not eligible for the NRHP are those with altered façades, constructed post-1980, occupied by parking facilities or parks, or vacant.

Of the 163 properties surveyed, 113 were either previously listed in the NRHP, previously determined eligible for the NRHP, contributing to a NRHP historic district, or identified as eligible by this survey.

Lori explained that after the federal agency has identified the historic properties in the APE, their next step is to look at the proposed undertaking and apply the criteria of adverse effect to determine its impact on the historic properties.

Lori outlined the criteria of adverse effect, which are laid out in 36 CFR 800. The regulation states, "An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative."

Lori clarified that a property does not have to possess all the aspects of integrity but must retain enough to convey its significance and emphasized that all types of effects should be considered when an agency is applying the criteria of adverse effect.

She continued with additional information from 36 CFR 800, "In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified historic properties, the agency official shall apply the criteria of adverse effect to historic properties within the area of potential effects. The agency official shall consider any views concerning such effects which have been provided by consulting parties and the public."

Lori pointed out that the consultation described in 36 CFR 800 is what is occurring through this and other consulting parties meetings. She provided possible effects associated with this undertaking (depending on the course of action chosen): partial or complete demolition, restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, provision of handicapped access, alterations to meet code, etc. Lori noted that even a reuse alternative that kept the buildings could result in an adverse effect if it is done in a way that is not consistent with the Secretary of the Interior's Standards for treatment of a historic property. Lori provided examples such as a new staircase that had to be added in a way that didn't meet the Secretary of the Interior's Standards, changing windows, altering the setting, or visual, atmospheric, or audible elements that diminish significant historic features.

Lori presented GSA's preliminary findings. Under Alternative A, Demolition, there could be adverse effects to 202, 214, and 220 South State Street; the Loop Retail Historic District (by removing contributing elements and leaving a gap in the streetscape); those properties adjacent to and across from the subject buildings that contribute to the Loop Retail Historic District; and the Chicago Federal Center (by changing its setting).

Under Alternative B, Viable Adaptive Reuse, there could be adverse effects to 202, 214, and 220 South State Street due to physical changes to the buildings that do not meet the Secretary of the Interior's Standards.

If there are significant archaeological resources in the APE, they would only be affected by demolition or reuse that involves removal of the basements or foundations. Lori added that mitigation would include monitoring during ground disturbance, and there would be an unanticipated discovery plan to address potential archaeological resources.



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- Anthony commented on Megan’s statement about the Historic Michigan Boulevard District and clarified that it was determined eligible by the NPS, not the Illinois SHPO.
- Ward Miller (Preservation Chicago) shared a list of additional outlease tenants in GSA buildings on State Street. Joe pointed out that one or two of those on the list no longer occupy the spaces but that the list overall looks accurate.

The list provided by Ward included:

- 7-Eleven
- Air Tech Service Center
- Burger King
- Jackson Hewett
- Loop Mini-Mart
- A currency exchange business

- Ward also asked if the GSA would consider individual NRHP designation for the Century and Consumers Buildings. Nicky stated that the GSA is open to discussing NRHP listing. GSA regularly nominates its properties to the NRHP, particularly in cases where they are disposing of the property and want to place covenants and other protections on the property.

Lori clarified that properties considered contributing to a NRHP-listed historic district are recognized and given the same consideration by Section 106 legislation as individually listed properties. Thus, individually listing the properties would not affect the Section 106 process. Nicky added that the GSA treats all of their determined eligible properties as though they are listed. This applies to all undertakings, maintenance, etc.

- Kevin and Ward commented on the APE being the greatest assemblage of historic buildings in the nation and world.
- Laura Lavernia (ACHP) provided statutory language on examples of adverse effects.
- Kevin asked when the archaeological survey of 208-212 South State Street, the building that was demolished, will begin. Joe responded that he does not believe there will be an archaeological survey because the foundation of the building will not be penetrated by any current work, thus potential archaeological resources will not be disturbed.
- Mark commented on the effects findings associated with Alternative A, demolition, and stated that the demolition of a historic building “will be” an adverse effect, not “could be” an adverse effect. Also, Alternative B, viable adaptive reuse, is highly unlikely to have an adverse effect because the federal government and any outlease tenant are required to follow the Secretary of the Interior’s Standards. Joe agreed and Nicky noted that in some cases, alterations may need to be made to meet life safety standards, such as constructing a stair on the exterior of the building because it could not be incorporated on the interior.

Nicky discussed plans for the July meeting, including reaching an agreement on the identified historic properties in the APE and the effects to them. Nicky shared that the August meeting will be conducted as a charette and focus on evaluating viable adaptive reuse options that will meet the 15 security criteria and have a viable long-term use (financially sound and compliant with a long-term GSA outlease).

Nicky explained the GSA’s vision of the charette as a participatory and collaborative session where everyone brings their knowledge of Chicago, its history and its market, to work with the GSA on exploring uses. She explained a charette uses a compressed schedule with brainstorming and sharing of ideas.



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Next, the group will consider the feasibility of the proposed ideas and ideally generate strong alternative solutions.

In preparation for the July and August meetings, Nicky asked the parties to think about and share their ideas for reuse as well as to reach out to the organizations they represent and their members for ideas. She also mentioned talking to urban development experts. Regarding challenges presented by the buildings, the overall rental market, and the need for capital investment, Nicky asked participants to think about solutions. She then provided a template for working out ideas including successful examples, potential partners, challenges, financial considerations, and next steps and encouraged participants to think through those categories as they talked with their organizations and among themselves about potential uses for the buildings.

Kandalyn Hahn (City of Chicago) asked about the conditions reports for the buildings. Joe answered that the conditions reports and cost estimates have been finalized and the GSA is currently in the process of uploading the reports to their website. He anticipates providing an update when the minutes are distributed for this meeting.

Joe reiterated that this and past meetings focused on sharing information and providing a baseline for the current state of the buildings and GSA's abilities/constraints in managing them going forward. For the upcoming charette, he hopes that the parties will be able to use their collective knowledge and expertise to identify ideas and come up with something that is viable, with viable being a key feature of the proposed uses.

Mark asked about the charette being in person. Joe shared that they are planning to host it in person but that there may be a hybrid aspect to accommodate those further away. He said they would send out a poll to see what the group's preferences are.

Brad commented on August being a popular time for vacations and Joe assured the group that they would start sending out notifications more in advance of meetings rather than month to month as they have been.

Cindy commented about meeting minutes and Joe responded that GSA tries to get them out within a week but in this case, it was a balance of preparing other material for the meeting and that delayed their distribution.

Ward asked if GSA considered possible impacts of the City of Chicago beginning the landmarks process on both the Century and Consumers buildings. Joe responded that they have been in discussions with the Department of Planning and Development and have also provided statements throughout the process. GSA is remaining neutral in the city's decision regarding landmark designation. He explained that there are two separate processes, one being local landmark designation and the second being this Section 106 process, which is a federal process. GSA will adhere to the federal process, which will result in a Section 106 programmatic agreement and a NEPA Record of Decision, and as such is neutral regarding the local process. GSA and the U.S. District Court have attended the Commission of Chicago Landmarks meetings, and both have provided written statements.

Ward asked for confirmation that GSA would not oppose Chicago Landmark designation at any point in the future but would remain neutral. Joe stated that GSA will remain "neutral" until the conclusion of the Section 106 process. If the conclusion of this process aligns with the landmark designation, GSA will likely revise its position. Also, owners must consent to have a property landmarked, but the process allows for an extension. GSA plans to ask for an extension of 120 days in hopes that by then the Section 106 process will be closer to completion and near a federal decision. At that point, GSA should have greater clarity on how to respond to the consent process. Joe explained that usually GSA responds with "no objection" in a local procedure so that the process can move forward while allowing GSA to adhere to the federal process. However, city municipal code requests a binary, yes or no, response. He added that



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GSA is in discussions with the Department of Planning and Development about how to navigate the process while maintaining federal neutrality.

Ward then expressed shock that the properties used as examples of outleases were also properties that had fallen into disrepair and shock that the federal government would let that happen. He also expressed disapproval of the past and/or present tenants in the adjacent GSA-owned buildings and disregard for their potential security risks to the federal center buildings.

Ward asked if there have been any changes or disturbances to any of the buildings in the 200 block of South State Street due to the demolition of 208-212 South State Street. If so, how have they been addressed and are there any repairs needed to 202, 214, and 220 South State Street? Joe provided an update on the demolition, stating that they are continuing manual demolition and have reached the rear/west wall of the building. To date there has been no damage to adjacent properties, including the privately owned Berghoff's Restaurant building. Joe explained that there are mitigation and risk plans in place and the site has water and vibration sensors that alert in real time. The vibration sensor was triggered twice, which related to the elevator shaft demolition in 208-212 South State Street, which is close to 214 South State Street. No damage was caused. Joe explained that the scope of the demolition also includes repairs to the walls of adjacent structures that were previously concealed by the side/north and south walls of 208-212 South State Street. This will include tuck pointing and waterproofing.

Ward then asked about the time frame for the removal of the fire escapes on the Century Building. Joe responded that GSA has reached out to SHPO about removing the fire escapes and parapet and is going to be entering into a procurement process to select a contractor in the next few weeks. He anticipates the project will begin in late summer and take about four months to complete. He also noted that GSA will coordinate with the city to facilitate street closures, etc.

Ward asked for confirmation that if the cornice or portions of the cornice have to be removed, they will be carefully removed, documented, and stored for reinstallation. Joe assured him that they will be, and so will the railings. He added that if a reuse strategy for the building is determined through this process, there may be an opportunity to reinstall those features.

Brad asked if there was a previous Section 106 process when GSA acquired the buildings? Nicky responded that acquisition is not a Section 106 undertaking. Brad asked if this is because acquisition has no potential for adverse effect and Nicky responded that purchase is not an adverse effect.

Ward brought up that in a past meeting, Dirk Lohan expressed interest in a design charrette of professionals as a part of this process. Ward suggested something open to the architectural community in Chicago and said he thought it would be really beneficial, especially noting the various reuse ideas that are out there. Joe responded that the Section 106 process will consider including GSA design peers, and current consulting parties include professional organizations such as two AIA chapters, BOMA, and the City of Chicago, which is working on many redevelopment initiatives downtown.

Dirk interjected to clarify that his interest is in giving time to professionals in architecture and planners, etc. to come up with viable solutions. He pointed out that a charrette is usually a one- or two-day affair.

Joe said the GSA would consider Dirk's feedback. He also reiterated that the objective of the charrette is not so much about design solutions but about identifying strategies that are viable for reuse. Dirk emphasized that those ideas are what he is talking about and that he agreed with Joe. Nicky added that GSA is aware that many of the participants on the call are representing larger parties and encouraged them to draw upon the knowledge and skill sets of their boards or executive committees, whoever would be best to collect ideas from the members of the organization. She also emphasized that only a limited number of people can participate in the consulting party meetings in order for them to be manageable, but that each participating individual speaks for many others in their group and should draw from that knowledge base.



202, 214, and 220 South State Street
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Brad then asked about who will evaluate the viability of the ideas or whether that will be determined through an RFP process with responses. Joe responded that GSA will take the lead on viability as part of their effort to evaluate alternatives and that they would collaborate with their federal partners. Brad asked if GSA will examine the market and Joe responded that GSA is prepared to issue an RFI to gauge market interest in the buildings. Seeking more clarity, Brad asked if the GSA is going to evaluate the viability from a market standpoint or is the market going to evaluate it or will GSA hire experts to evaluate the market? Joe responded that the GSA is considering a few of those options including the RFI, and an internal study on financial viability of reuse of these properties.

Cindy said that in order for GSA to get a realistic idea of market interest, it's important to understand what incentives would be available for rehabilitating the properties. She asked what money the federal government has to put towards repairing the maintenance issues that have been caused over the years. Joe pointed to the material presented earlier in the meeting on the structure of the outleases, which offer in-kind options in lieu of rent. This incentive structure is available to GSA under Section 111 of NHPA. Cindy referred to the estimated construction costs shared by the GSA of almost \$400 million for the repair of the two high rises and asked for confirmation that was the correct amount. Joe pointed out that it included the smaller building, 214 South State Street as well, and that the number was correct. Cindy noted the market and upfront financing as the greatest problem today. Reducing the lease amount/rent will help with operations, but it won't help close on a construction loan. She reiterated the importance of the GSA offering an incentives package that can bridge the gaps in funding and address the estimated construction costs. Lucrezia Patruno (GSA) said that questions like Cindy's are the type of questions needed for the charette. The point of the charette is to look for viable reuse options and the factors that will contribute to or hinder viability, such as the 15 security criteria and financial challenges. Cindy responded that she wasn't sure if the expertise of the consulting parties is the right expertise to answer those questions and that more developers and people in the finance and real estate industry are needed as participants to have a productive charette. Joe noted that they would look into her concerns further, but that at this point the GSA does not have an incentives package specific to funds to ease the capital investment cost of \$400m.

Ward asked how the estimated cost of the restoration compares with CA Ventures and Cedar Street's estimated costs when they were looking at reusing the buildings for residential; even accounting for inflation, the numbers seem high. Joe doesn't have the proposals but will check with GSA's disposal office. He clarified that GSA's intent was to identify deficiencies and conditions that an offeror would need to know but agreed that the numbers seem significantly higher than what was stated by the developer, who was involved in the disposal process, at the November 2022 public scoping meeting. He also pointed out that private development still needs to adhere to preservation standards and the prior developer/offeror would have had the same responsibilities. Ward suggested inviting that developer to the charette since he is familiar with the buildings. Joe said that developer, along with other attendees of the public scoping process, were invited to be a consulting party under Section 106, but he did not respond. GSA met with that developer following the public scoping meeting. A second developer at the public scoping meeting did not request to be a consulting party either. Ward pointed out how they went through an expensive process but were denied by GSA in the end and were understandably disappointed.

Ward also mentioned that the CEO of the Chicago Park District, Patrick Levar, told him that the city has several leases expiring in the next few years in several downtown buildings. Ward said that it would be wonderful to have the City of Chicago as a partner in this development and possibly in one of the buildings, taking into consideration a two-to-five-year forecast for renovation and project completion. Joe asked Cindy if she would like to respond to Ward's comment and she responded that the city departments would have authority on that decision. She also pointed to the cost as a large hurdle to the city, just like any other tenant or developer, and again emphasized the importance of developing an incentive package before issuing an RFI. Joe acknowledged a similar question from Kevin who asked about the cost multiplier and said that as of today, GSA does not have funds available for a reuse strategy. He referred to today's presentation on outlease structures and how those are the tools available.



202, 214, and 220 South State Street
NHPA Section 106 Consulting Parties Meeting #5
June 9, 2023

Joe added that they can examine those terms to see what might be viable to a developer and discuss those options in the charette.

Kelly Fanizzo (ACHP) asked if information collected from an RFI would be available prior to the charette, and Joe said that it is unlikely since the RFI will be posted for 90 to 120 days. The only responses available would be those who responded before the date of the charette. GSA to review further.

Laura commented that viability should be brought up in some way before the charette and that many of the comments in the chat make very valuable points. She said that GSA should provide an answer for how they fulfilled or didn't fulfill their legal responsibilities as the federal agency charged with the care and custody of the buildings. She asked if GSA is going to take responsibility for their care by incentivizing and providing assistance. Joe responded that they are trying to be transparent but at this time there are no funds available from GSA for reuse or a cost multiplier to contribute and ensure a reuse is viable. He added that GSA will continue to track possibilities and GSA is considering a 60- to 99-year lease to see if that draws any interest as well as continuing discussions with the consulting parties. In reference to a question from Kevin, Joe added that the \$52 million for demolition is available and being utilized for the 208-212 South State Street demolition and removing the fire escape.

Cindy noted that GSA is a part of the executive branch and asked if this gives GSA tools and flexibility, such as issuing bonds or putting an earmark in the federal budget and asked why GSA was limiting their thought process to existing incentives and not considering their ability to offer more. Joe responded that what he is sharing is what is on the ledger currently. He noted that there needs to be a specific ask for something like that. Cindy emphasized that GSA needs to research so they have a better understanding of what the gap is. Joe agreed and said they could make budget requests, etc. but that 'viable' also means 'realistic' and part of what GSA's team is trying to convey is the likelihood of other options.

Laura asked what criteria GSA is going to use to determine viability. Joe pointed to the considerations discussed in the presentation on outleasing including the 15 security criteria, cash flow, and rehabilitation of the properties. Laura pointed out that the presentation outlined how it is done in general but her request was to know about how it will be done for this property and to have more transparency in that process. Joe said they would take that into consideration and would start documenting their viability decision-making process.

Laura asked if GSA would consider workforce housing for federal employees, city and municipal employees who have gone through background checks as different from standard apartment use? Joe said they would review that possibility.

Kandalyn asked how much of the \$52 million will be left after the demolition of 208-212 South State Street and removal of the fire escapes. Joe said GSA has not recently priced out the demolition of all the properties in part because that scope is not defined. He added that part of this undertaking is identifying ways to minimize adverse effects and similar outcomes. To date, the demolition of 208-212 South State Street is \$3.2 million and that soon they will be proceeding with the removal of the parapet and fire escape on 202 South State Street, but those costs cannot be shared at this time because the scope is in procurement. Additionally, the \$52m is being used to study alternatives, including demolition, to satisfy NEPA and NHPA considerations.

Joe then adjourned the meeting, thanking everyone for their time and assuring he would follow up on questions and comments.

1 B2. Section 106 Agency Correspondence



October 12, 2022

Mr. Anthony Rubano
Deputy State Historic Preservation Officer
Illinois State Historic Preservation Office
One Old State Capitol Plaza, 2nd Floor
Springfield, Illinois 62701

Re: Initiation of Consultation Pursuant to 36 CFR Part 800 *et seq.*,
Description & Maps of the Areas of Potential Effects (APE), and a
List of Potential Consulting Parties
202-220 South State Street
Chicago, Illinois
Cook County

Dear Mr. Rubano:

I write to update your office regarding the status of the above referenced properties and formally initiate consultation under the National Environmental Policy Act (NEPA), 42 USC 4321 *et seq.*, and the implementing regulations for Section 106 of the National Historic Preservation Act of 1966 as amended (NHPA), 36 CFR Part 800 *et seq.*

As previously noted in my letter to your office dated March 30, 2022, Congress has appropriated funds for the U.S. General Services Administration (GSA) concerning 202-220 South State Street under the [Consolidated Appropriations Act, 2022](#) (the Act), dated March 8, 2022 and signed into law by the President on March 15, 2022. On page 551 of the Act, GSA is provided specific obligational authority in the amount of \$52 million “for demolition of the buildings located at 202-220 South State Street in Chicago, Illinois, and protection of the adjacent buildings during the demolition process, securing the vacant site of the demolished buildings, and landscaping the vacant site following demolition.” This description is the proposed undertaking (Project). At present, there are no plans to rebuild on the site.

GSA has contracted with Jacobs Technology, Inc. (Jacobs) in partnership with the Commonwealth Heritage Group (CHG) for professional services to assist us with the development of our NEPA and NHPA due diligence studies, analysis, and consultation activities pursuant to these laws, which we plan to run concurrently. During the NEPA and Section 106 processes GSA will evaluate the Project as well as any viable alternatives identified in consultation, in order to inform our Record of Decision under NEPA, and any Section 106 agreement document resulting from these consultations.

Multiple federal security agencies affirm that the Everett M. Dirksen U.S. Courthouse (219 S. Dearborn Street) and its occupants are at particular risk of harm by hostile acts. Therefore, the central purpose of the Project is to mitigate security vulnerabilities associated with buildings 202, 208-212, 214 and 220 South State Street, and to respond to the passing of 2022 Consolidated Appropriations Act, which calls for the demolition of these buildings and to effectively manage federal property for which there is no federal occupancy need.

In accordance with the procedures described in 36 CFR Part 800 related to the identification of historic properties, GSA has delineated an APE for the Project, both for archaeological and above-ground resources (buildings and structures). Both APEs were developed with consideration of direct physical, visual, and contextual effects of the Project, as well as foreseeable indirect effects (secondary, future, or cumulative impacts). For archaeological resources, the APE is defined to encompass all areas where the Project may potentially cause ground disturbance. For above-ground resources, the APE includes 202-220 S. State Street and parcels adjacent to and within the viewshed of the Project in all directions, where direct and indirect effects may occur. Please see the attached memo developed by CHG in collaboration with GSA providing more details on these APEs. I am also including a preliminary list of potential consulting parties. Please let us know if there are other agencies, organizations, or individuals who you think should be considered for consulting party status.

Our GSA team is preparing for a NEPA public scoping meeting which will also initiate the public consultation required by Section 106. We are currently targeting November 10, 2022 for this first, broad, public consultation activity. That date could move back a bit as the NEPA public Notice of Intent (NOI) document needs to be published in the Federal Register thirty (30) days prior to the scheduled date of the event. This scoping meeting is currently being planned as a virtual and in-person hybrid meeting, with the recognition that in November public health recommendations could shift from their current status.

Finally, GSA has had conversations with City of Chicago personnel including Samir Mayekar, Deputy Mayor for Neighborhood & Economic Development; Maurice Cox, Commissioner of the Department of Planning and Development; and Dijana Cuvalo of the Historic Preservation Division. All expressed strong concern over the demolition of the Century and the Consumers buildings as contributing structures to the National Register listed Loop Retail Historic District along with the long-term void in the urban fabric created by the removal of these properties. The City is also concerned about the potential economic impact on the State Street commercial corridor particularly in the wake of the strains commercial real estate is experiencing in the Loop in part due to the duress imposed by the pandemic.

Additionally, as you are likely aware, the Commission on Chicago Landmarks (Commission) recently asked its staff to prepare a report to inform a possible recommendation by the Commission to City Council for local landmark status for the Century and Consumers buildings. Upon the request of Commission staff, GSA and the U.S. District Court provided written comments for the Commission meetings on this subject. I have included those as attachments for your reference as well. At the Commission meeting on Sept. 8th the Chairman decided to hold off on their vote regarding landmark recommendations until the City can obtain more information from GSA on the Project. GSA plans to

extend consulting party status to the City and we have informed the Advisory Council on Historic Preservation about the Project and anticipate their participation in consultation as well.

I look forward to speaking with you soon to discuss upcoming activities. Please let me know your questions or comments at this juncture of the consultation process.

Sincerely,



Regina Nally
Regional Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region

cc: Beth Savage, GSA Federal Preservation Officer

Enclosed **Memo - Subject: Section 106 – Proposed Area of Potential Effects (APE) State Street, North Site Building Project, Chicago, Illinois, developed by Commonwealth Heritage Group in collaboration with GSA, dated Sept. 27, 2022, 6 pages.**

List of Potential Consulting Parties, PDF dated August 22, 2022, 1 page.

Statement from the U.S. District Court to the Commission on Chicago Landmarks Regarding Proposed Demolition of Properties at 202-220 S. State Street, Chicago for the Meeting of the Commission – July 7, 2022, dated July 6, 2022, 2 pages.

Statement of the Federal Court to the Commission on Chicago Landmarks Regarding Proposed Demolition of Properties at 202-220 S. State Street, Chicago for the Meeting of the Commission – September 8, 2022, dated September 7, 2022, 2 pages.

GSA Statement - Commission of Chicago Landmarks - Proposed Demo 202-220 S State - Meeting 7-7-22, dated July 6, 2022, 2 pages.

GSA Statement - Commission on Chicago Landmarks - Prelim Landmark Recommendation - Meeting 9-8-22, dated September 1, 2022, 2 pages.



U.S. General Services Administration

January 5, 2023

Via Email: cpnthpo@potawatomi.org

Citizen Potawatomi Nation, Oklahoma
1601 S. Gordon Cooper Drive
Shawnee, OK 74801

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear Kelli Mosteller, THPO:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

Description of the Undertaking

Congress has appropriated funds for the U.S. General Services Administration (GSA) concerning 202-220 South State Street under the Consolidated Appropriations Act, 2022 (the Act), dated March 8, 2022 and signed into law by the President on March 15, 2022. On page 551 of the Act, GSA is provided specific obligational authority in the amount of \$52 million “for demolition of the buildings located at 202-220 South State Street in Chicago, Illinois, and protection of the adjacent buildings during the demolition process, securing the vacant site of the demolished buildings, and landscaping the vacant site following demolition.” At present, there are no plans to rebuild on the site. The proposed Undertaking is to address federal security vulnerabilities for the Everett M. Dirksen U.S. Courthouse, respond to congressional intent (2022 Consolidated Appropriations Act), and manage federal assets (there is no federal occupancy need for the buildings at 202-220 South State Street).

In accordance with the procedures described in 36 CFR Part 800 related to the identification of historic properties, GSA has delineated an Area of Potential Effects (APE) for the Undertaking (Figure 2), both for archaeological and above-ground resources (buildings and structures). Both APEs were developed with consideration of direct physical, visual, and contextual effects of the Undertaking, as well as foreseeable indirect effects (secondary, future, or cumulative impacts). For archaeological resources, the APE is defined to encompass all areas where the Undertaking may cause ground disturbance. For above-ground resources, the APE includes 202-220 S. State Street

and parcels adjacent to and within the viewshed of the Undertaking in all directions, where direct and indirect effects may occur. This includes the boundaries of the National Register of Historic Places-listed Loop Retail Historic District, of which both 202 and 220 S. State Street are contributing resources. Please see the attached APE maps providing more details on the site of the Undertaking and its urban context.

Considerations of potential impacts to archaeological, historic, and architectural resources (collectively referred to as “cultural resources”) are being considered with the support of GSA’s third-party contractor Jacobs, Inc. (Jacobs) and their cultural resources consultant Commonwealth Heritage Group (CHG).

As mentioned, an EIS under NEPA is being prepared concurrently. GSA has identified three preliminary alternatives to address the future of the four GSA-owned buildings located at 202, 208-212, 214, and 220 South State Street that will be evaluated during the preparation of the EIS. Additional alternatives may be identified during the NEPA and NHPA processes. The preliminary alternatives for which GSA is assessing effects to the natural and cultural environment are described as:

Demolition: GSA will assess the effects of potential demolition of the four buildings at 202, 208-212, 214, and 220 South State Street included in the 2022 Consolidated Appropriations Act. This is the Proposed Action as identified under NEPA. The funds appropriated by Congress are available only for demolition, securing the site, and landscaping. The Proposed Action includes protection of adjacent properties during demolition, securing the vacant site of the demolished buildings and landscaping of the vacant site following demolition.

Viable Adaptive Reuse: Rehabilitation or modification of some or all of the properties may be considered if they can meet the security needs of the Dirksen U.S. Courthouse. A list of reuse criteria has been developed in collaboration with the United States District Court, Northern District of Illinois, and federal law enforcement agencies. Currently, there are no federal funds available for rehabilitation, preservation, or restoration of the buildings at 202, 208-212, 214, and 220 South State Street.

No Action: GSA would continue with the status quo; the buildings would remain in place, vacant with significant repairs needed, and have limited federal funds for maintenance.

Tribal Communications Plan

GSA is concurrently initiating consultation with the Illinois SHPO, the Advisory Council on Historic Preservation and other affected or interested federal, state and local agencies and non-governmental agencies (NGOs). Our goals also strive to facilitate a process by which to conduct meaningful, informative, and equitable dialogue with Native American Tribes/Tribal Nations to understand and consider their interests, and to support socially responsible project development.

GSA invites your comments, input, and guidance regarding the Undertaking. We also welcome your interest in being involved in the Undertaking’s development. If you would like to participate in formal tribal consultation, please notify us in writing within 30 calendar days of receipt of this invitation and we will reach out to you for possible dates and times to begin discussions. If you choose to participate in Section 106 consultation, we will provide you with forthcoming draft documents for your review and comment, and you will be kept apprised of project progress, including agency consultation and consulting parties meetings for federal, state, and local agencies and NGOs. GSA

will hold an initial consulting parties meeting for these groups on **Thursday, January 19, 2023 from 1:00pm to 3:00pm CST**, in a virtual format. You are welcome to participate. A follow-up email with a link to the virtual meeting will be provided if you indicate you are interested in participating in either this initial meeting or future consulting parties meetings.

Additionally, if you are aware of other stakeholder groups that are interested in consulting on this Undertaking, please respond with the appropriate contact information.

Thank you for your time. GSA understands that meaningful engagement is critical to maintaining a collaborative working relationship with Tribes/Tribal Nations, and therefore intends to achieve open communication, coordination, and collaboration during the project process.

Formal responses to this invitation, as well as any questions or requests for additional information, should be directed to me at regina.nally@gsa.gov.

Sincerely,

 for

Regina A. Nally
Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
Chicago, IL 60604
312-848-0266 (m)

cc via email: CJ Wallace, Cultural Resources Coordinator, Illinois State Historic Preservation Office (SHPO)
Laura Lavernia, GSA Liaison, Advisory Council on Historic Preservation (ACHP)

Attachments: Figure 1. Project Location Map
Figure 2. Area of Potential Effects (APE)

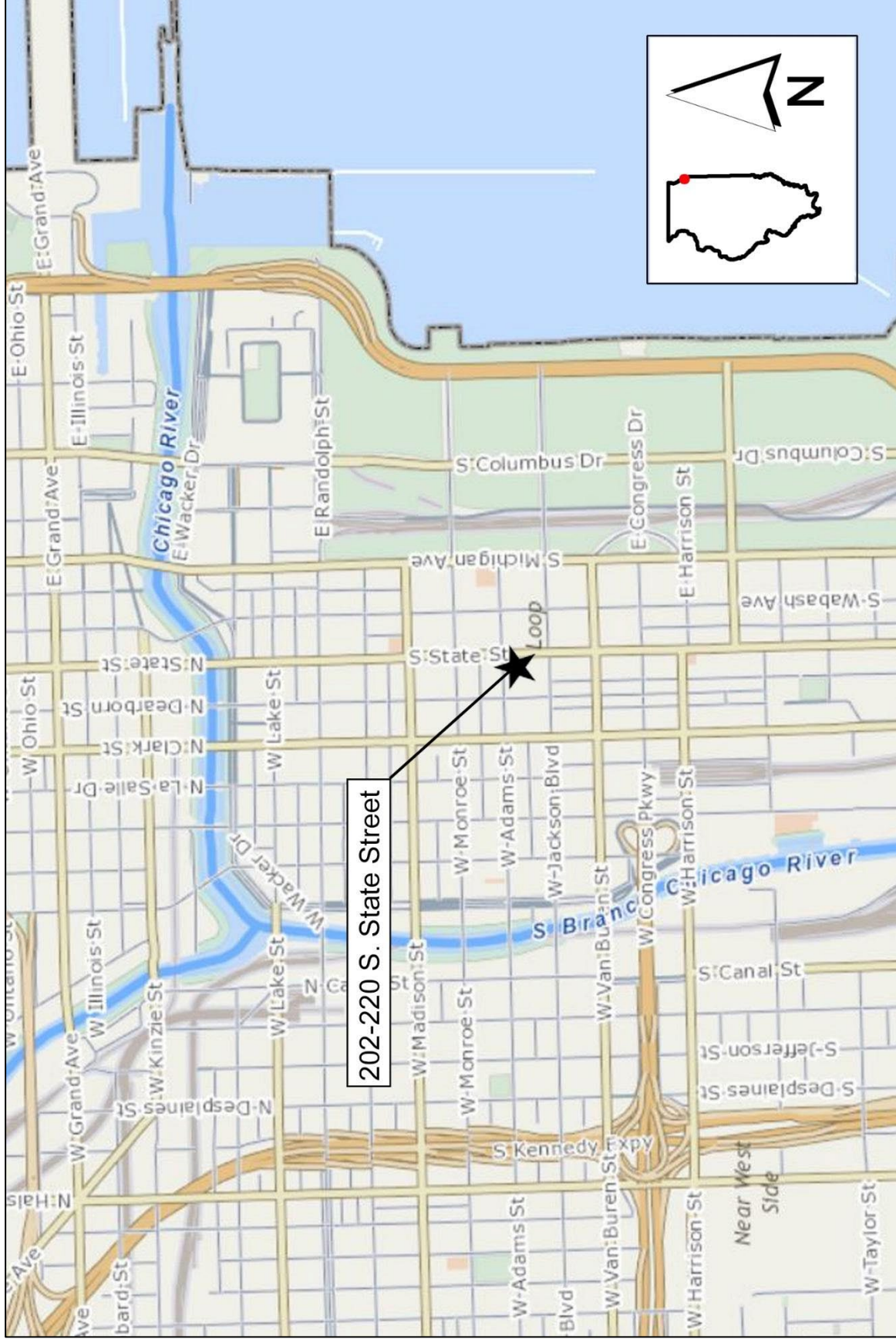


Figure 1. Project Location Map



U.S. General Services Administration

January 5, 2023

Via Email: benjamin.rhodd@fcp-nsn.gov

Forest County Potawatomi Community of Wisconsin
PO Box 340
Crandon, WI 54520

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear Ben Rhodd, THPO:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

Description of the Undertaking

Congress has appropriated funds for the U.S. General Services Administration (GSA) concerning 202-220 South State Street under the Consolidated Appropriations Act, 2022 (the Act), dated March 8, 2022 and signed into law by the President on March 15, 2022. On page 551 of the Act, GSA is provided specific obligational authority in the amount of \$52 million “for demolition of the buildings located at 202-220 South State Street in Chicago, Illinois, and protection of the adjacent buildings during the demolition process, securing the vacant site of the demolished buildings, and landscaping the vacant site following demolition.” At present, there are no plans to rebuild on the site. The proposed Undertaking is to address federal security vulnerabilities for the Everett M. Dirksen U.S. Courthouse, respond to congressional intent (2022 Consolidated Appropriations Act), and manage federal assets (there is no federal occupancy need for the buildings at 202-220 South State Street).

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cause ground disturbance. For above-ground resources, the APE includes 202-220 S. State Street and parcels adjacent to and within the viewshed of the Undertaking in all directions, where direct and indirect effects may occur. This includes the boundaries of the National Register of Historic Places-listed Loop Retail Historic District, of which both 202 and 220 S. State Street are contributing resources. Please see the attached APE maps providing more details on the site of the Undertaking and its urban context.

Considerations of potential impacts to archaeological, historic, and architectural resources (collectively referred to as “cultural resources”) are being considered with the support of GSA’s third-party contractor Jacobs, Inc. (Jacobs) and their cultural resources consultant Commonwealth Heritage Group (CHG).

As mentioned, an EIS under NEPA is being prepared concurrently. GSA has identified three preliminary alternatives to address the future of the four GSA-owned buildings located at 202, 208-212, 214, and 220 South State Street that will be evaluated during the preparation of the EIS. Additional alternatives may be identified during the NEPA and NHPA processes. The preliminary alternatives for which GSA is assessing effects to the natural and cultural environment are described as:

Demolition: GSA will assess the effects of potential demolition of the four buildings at 202, 208-212, 214, and 220 South State Street included in the 2022 Consolidated Appropriations Act. This is the Proposed Action as identified under NEPA. The funds appropriated by Congress are available only for demolition, securing the site, and landscaping. The Proposed Action includes protection of adjacent properties during demolition, securing the vacant site of the demolished buildings and landscaping of the vacant site following demolition.

Viable Adaptive Reuse: Rehabilitation or modification of some or all of the properties may be considered if they can meet the security needs of the Dirksen U.S. Courthouse. A list of reuse criteria has been developed in collaboration with the United States District Court, Northern District of Illinois, and federal law enforcement agencies. Currently, there are no federal funds available for rehabilitation, preservation, or restoration of the buildings at 202, 208-212, 214, and 220 South State Street.

No Action: GSA would continue with the status quo; the buildings would remain in place, vacant with significant repairs needed, and have limited federal funds for maintenance.

Tribal Communications Plan

GSA is concurrently initiating consultation with the Illinois SHPO, the Advisory Council on Historic Preservation and other affected or interested federal, state and local agencies and non-governmental agencies (NGOs). Our goals also strive to facilitate a process by which to conduct meaningful, informative, and equitable dialogue with Native American Tribes/Tribal Nations to understand and consider their interests, and to support socially responsible project development.

GSA invites your comments, input, and guidance regarding the Undertaking. We also welcome your interest in being involved in the Undertaking’s development. If you would like to participate in formal tribal consultation, please notify us in writing within 30 calendar days of receipt of this invitation and we will reach out to you for possible dates and times to begin discussions. If you choose to participate in Section 106 consultation, we will provide you with forthcoming draft documents for your review and comment, and you will be kept apprised of project progress, including agency

consultation and consulting parties meetings for federal, state, and local agencies and NGOs. GSA will hold an initial consulting parties meeting for these groups on **Thursday, January 19, 2023 from 1:00pm to 3:00pm CST**, in a virtual format. You are welcome to participate. A follow-up email with a link to the virtual meeting will be provided if you indicate you are interested in participating in either this initial meeting or future consulting parties meetings.

Additionally, if you are aware of other stakeholder groups that are interested in consulting on this Undertaking, please respond with the appropriate contact information.

Thank you for your time. GSA understands that meaningful engagement is critical to maintaining a collaborative working relationship with Tribes/Tribal Nations, and therefore intends to achieve open communication, coordination, and collaboration during the project process.

Formal responses to this invitation, as well as any questions or requests for additional information, should be directed to me at regina.nally@gsa.gov.

Sincerely,



Regina A. Nally for

Regina A. Nally
Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
Chicago, IL 60604
312-848-0266 (m)

cc via email: CJ Wallace, Cultural Resources Coordinator, Illinois State Historic Preservation Office (SHPO)
Laura Lavernia, GSA Liaison, Advisory Council on Historic Preservation (ACHP)

Attachments: Figure 1. Project Location Map
Figure 2. Area of Potential Effects (APE)

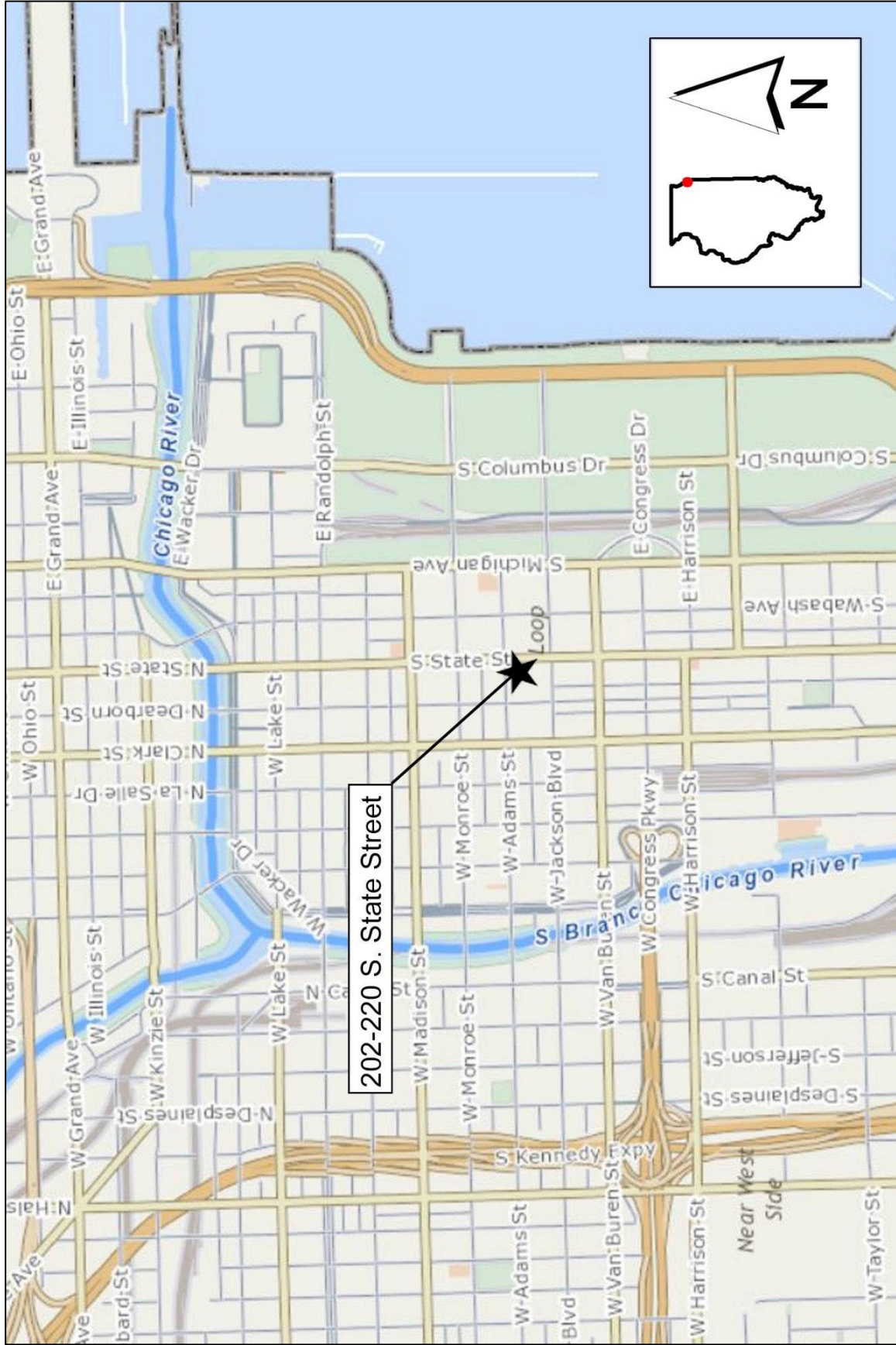


Figure 1. Project Location Map



U.S. General Services Administration

January 5, 2023

Via Email: tyderyien@hannahville.org

Hannahville Indian Community, Michigan
N14911 Hannahville B1 Road
Wilson, MI 49896

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear Kenneth Meshigaud, Chairperson:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

Description of the Undertaking

Congress has appropriated funds for the U.S. General Services Administration (GSA) concerning 202-220 South State Street under the Consolidated Appropriations Act, 2022 (the Act), dated March 8, 2022 and signed into law by the President on March 15, 2022. On page 551 of the Act, GSA is provided specific obligational authority in the amount of \$52 million “for demolition of the buildings located at 202-220 South State Street in Chicago, Illinois, and protection of the adjacent buildings during the demolition process, securing the vacant site of the demolished buildings, and landscaping the vacant site following demolition.” At present, there are no plans to rebuild on the site. The proposed Undertaking is to address federal security vulnerabilities for the Everett M. Dirksen U.S. Courthouse, respond to congressional intent (2022 Consolidated Appropriations Act), and manage federal assets (there is no federal occupancy need for the buildings at 202-220 South State Street).

In accordance with the procedures described in 36 CFR Part 800 related to the identification of historic properties, GSA has delineated an Area of Potential Effects (APE) for the Undertaking (Figure 2), both for archaeological and above-ground resources (buildings and structures). Both APEs were developed with consideration of direct physical, visual, and contextual effects of the Undertaking, as well as foreseeable indirect effects (secondary, future, or cumulative impacts). For archaeological resources, the APE is defined to encompass all areas where the Undertaking may

cause ground disturbance. For above-ground resources, the APE includes 202-220 S. State Street and parcels adjacent to and within the viewshed of the Undertaking in all directions, where direct and indirect effects may occur. This includes the boundaries of the National Register of Historic Places-listed Loop Retail Historic District, of which both 202 and 220 S. State Street are contributing resources. Please see the attached APE maps providing more details on the site of the Undertaking and its urban context.

Considerations of potential impacts to archaeological, historic, and architectural resources (collectively referred to as “cultural resources”) are being considered with the support of GSA’s third-party contractor Jacobs, Inc. (Jacobs) and their cultural resources consultant Commonwealth Heritage Group (CHG).

As mentioned, an EIS under NEPA is being prepared concurrently. GSA has identified three preliminary alternatives to address the future of the four GSA-owned buildings located at 202, 208-212, 214, and 220 South State Street that will be evaluated during the preparation of the EIS. Additional alternatives may be identified during the NEPA and NHPA processes. The preliminary alternatives for which GSA is assessing effects to the natural and cultural environment are described as:

Demolition: GSA will assess the effects of potential demolition of the four buildings at 202, 208-212, 214, and 220 South State Street included in the 2022 Consolidated Appropriations Act. This is the Proposed Action as identified under NEPA. The funds appropriated by Congress are available only for demolition, securing the site, and landscaping. The Proposed Action includes protection of adjacent properties during demolition, securing the vacant site of the demolished buildings and landscaping of the vacant site following demolition.

Viable Adaptive Reuse: Rehabilitation or modification of some or all of the properties may be considered if they can meet the security needs of the Dirksen U.S. Courthouse. A list of reuse criteria has been developed in collaboration with the United States District Court, Northern District of Illinois, and federal law enforcement agencies. Currently, there are no federal funds available for rehabilitation, preservation, or restoration of the buildings at 202, 208-212, 214, and 220 South State Street.

No Action: GSA would continue with the status quo; the buildings would remain in place, vacant with significant repairs needed, and have limited federal funds for maintenance.

Tribal Communications Plan

GSA is concurrently initiating consultation with the Illinois SHPO, the Advisory Council on Historic Preservation and other affected or interested federal, state and local agencies and non-governmental agencies (NGOs). Our goals also strive to facilitate a process by which to conduct meaningful, informative, and equitable dialogue with Native American Tribes/Tribal Nations to understand and consider their interests, and to support socially responsible project development.

GSA invites your comments, input, and guidance regarding the Undertaking. We also welcome your interest in being involved in the Undertaking’s development. If you would like to participate in formal tribal consultation, please notify us in writing within 30 calendar days of receipt of this invitation and we will reach out to you for possible dates and times to begin discussions. If you choose to participate in Section 106 consultation, we will provide you with forthcoming draft documents for your review and comment, and you will be kept apprised of project progress, including agency

consultation and consulting parties meetings for federal, state, and local agencies and NGOs. GSA will hold an initial consulting parties meeting for these groups on **Thursday, January 19, 2023 from 1:00pm to 3:00pm CST**, in a virtual format. You are welcome to participate. A follow-up email with a link to the virtual meeting will be provided if you indicate you are interested in participating in either this initial meeting or future consulting parties meetings.

Additionally, if you are aware of other stakeholder groups that are interested in consulting on this Undertaking, please respond with the appropriate contact information.

Thank you for your time. GSA understands that meaningful engagement is critical to maintaining a collaborative working relationship with Tribes/Tribal Nations, and therefore intends to achieve open communication, coordination, and collaboration during the project process.

Formal responses to this invitation, as well as any questions or requests for additional information, should be directed to me at regina.nally@gsa.gov.

Sincerely,



Regina A. Nally for

Regina A. Nally
Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
Chicago, IL 60604
312-848-0266 (m)

cc via email: CJ Wallace, Cultural Resources Coordinator, Illinois State Historic Preservation Office (SHPO)
Laura Lavernia, GSA Liaison, Advisory Council on Historic Preservation (ACHP)

Attachments: Figure 1. Project Location Map
Figure 2. Area of Potential Effects (APE)

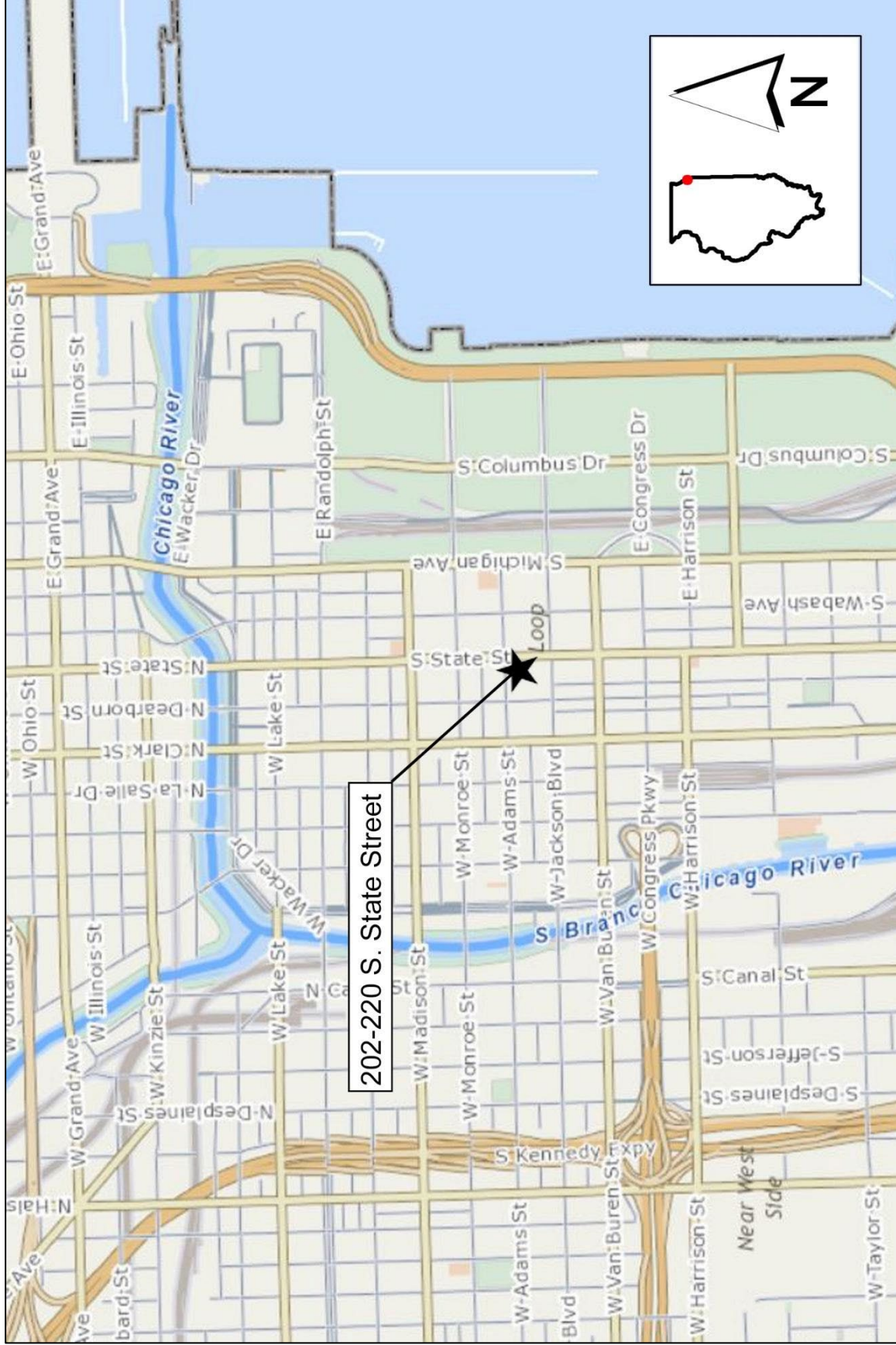


Figure 1. Project Location Map



U.S. General Services Administration

January 5, 2023

Via Email: darwin.kaskaske@okkt.net

Kickapoo Tribe of Oklahoma
PO Box 70
McLoud, OK 74851

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear Darwin Kaskaske, Chairman:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

Description of the Undertaking

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No Action: GSA would continue with the status quo; the buildings would remain in place, vacant with significant repairs needed, and have limited federal funds for maintenance.

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Formal responses to this invitation, as well as any questions or requests for additional information, should be directed to me at regina.nally@gsa.gov.

Sincerely,

 *Regina A. Nally* for

Regina A. Nally
Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
Chicago, IL 60604
312-848-0266 (m)

cc via email: CJ Wallace, Cultural Resources Coordinator, Illinois State Historic Preservation Office (SHPO)
Laura Lavernia, GSA Liaison, Advisory Council on Historic Preservation (ACHP)

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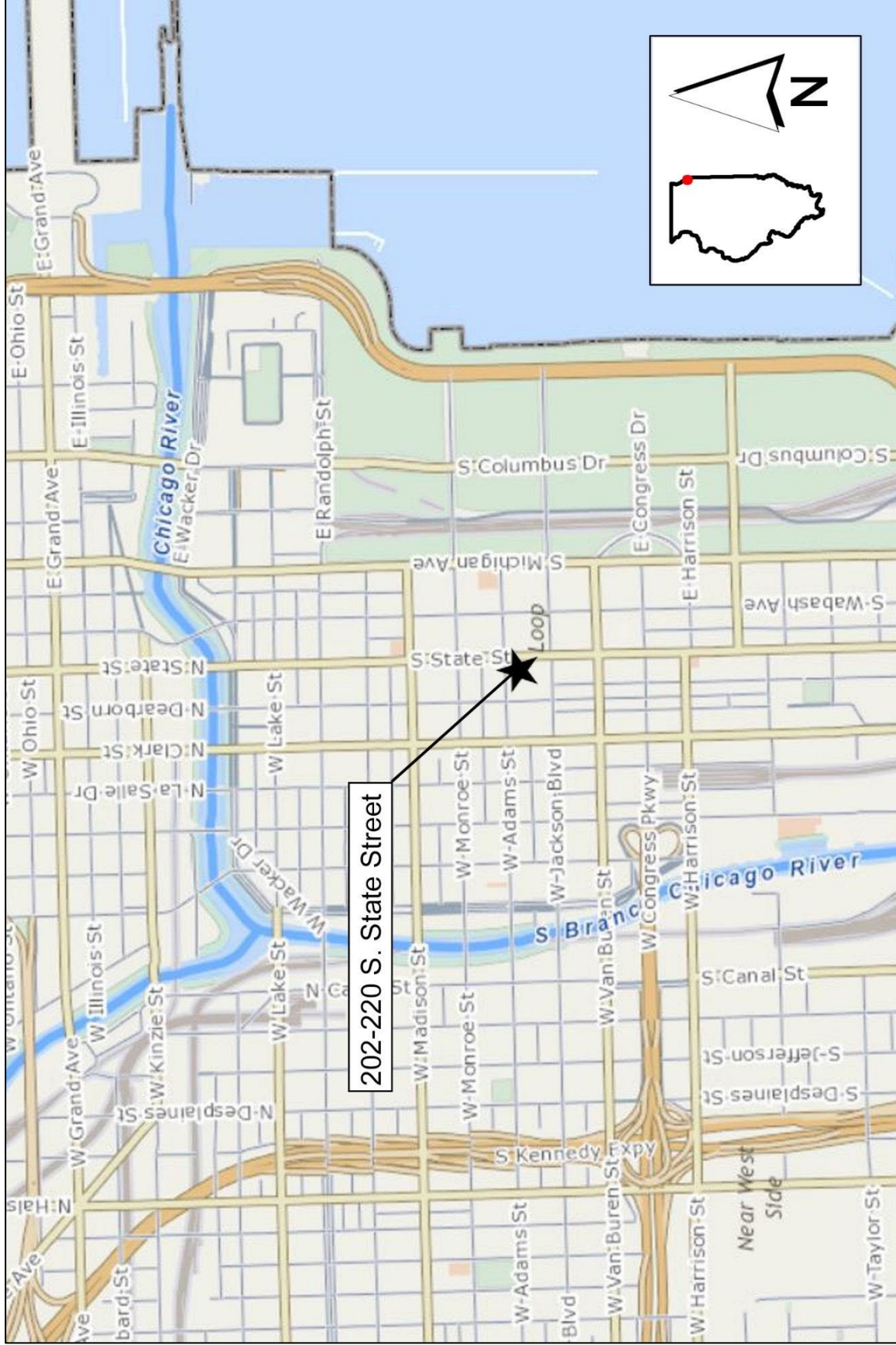


Figure 1. Project Location Map



U.S. General Services Administration

January 5, 2023

Via Email: mwiatrolik@ltbbodawa-nsn.gov

Little Traverse Bay bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear Melissa Wiatrolik, THPO:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

Description of the Undertaking

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No Action: GSA would continue with the status quo; the buildings would remain in place, vacant with significant repairs needed, and have limited federal funds for maintenance.

Tribal Communications Plan

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Formal responses to this invitation, as well as any questions or requests for additional information, should be directed to me at regina.nally@gsa.gov.

Sincerely,



Regina A. Nally for

Regina A. Nally
Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
Chicago, IL 60604
312-848-0266 (m)

cc via email: CJ Wallace, Cultural Resources Coordinator, Illinois State Historic Preservation Office (SHPO)
Laura Lavernia, GSA Liaison, Advisory Council on Historic Preservation (ACHP)

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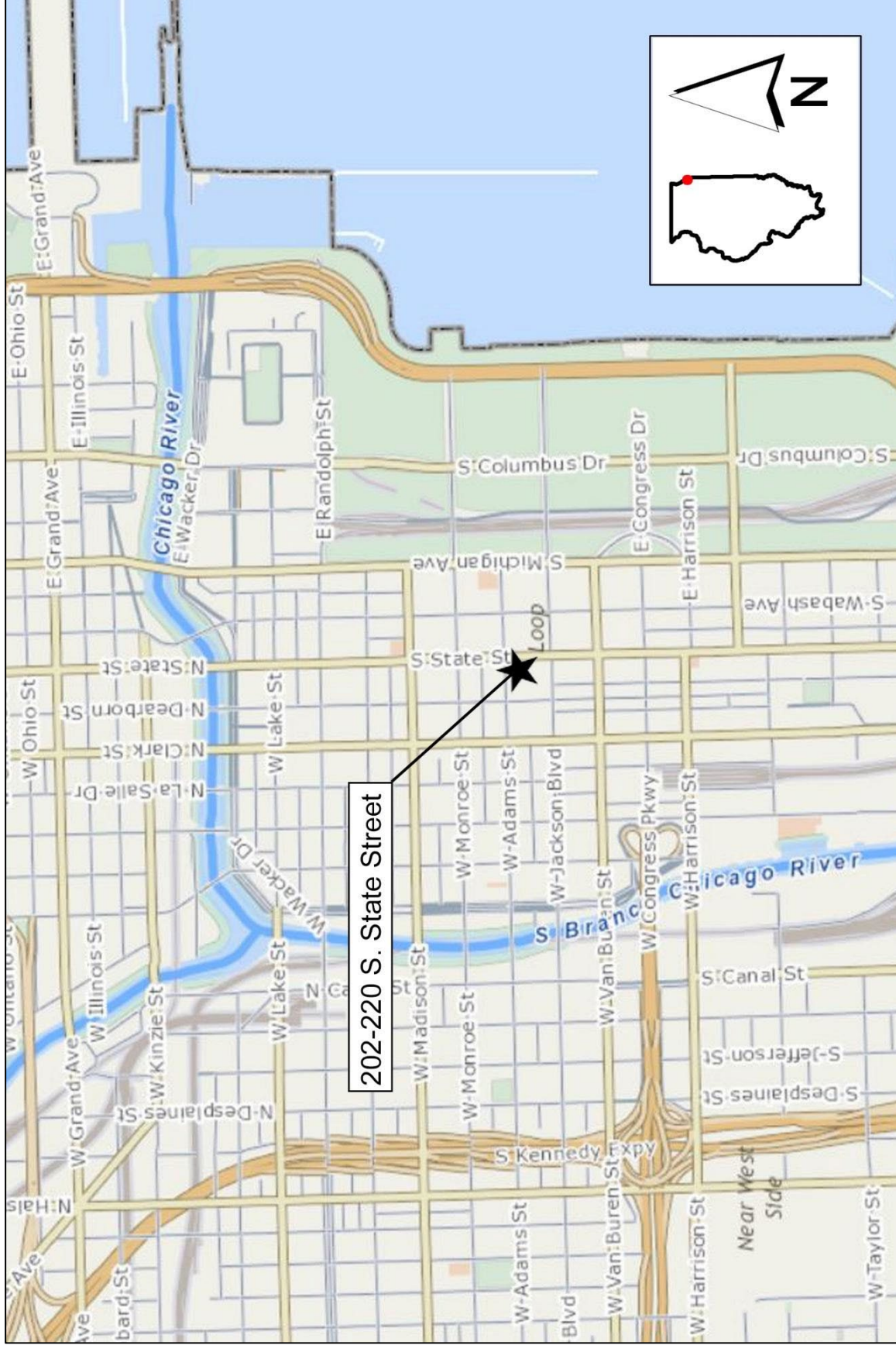


Figure 1. Project Location Map



U.S. General Services Administration

January 5, 2023

Via Email: mitwadmin@mitw.org

Menominee Indian Tribe of Wisconsin
PO Box 910
Keshena, WI 54135

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear David Grignon, THPO:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

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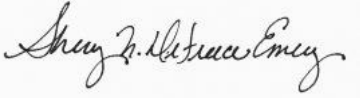
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Regina A. Nally
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U.S. General Services Administration
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230 S. Dearborn, Suite 3600
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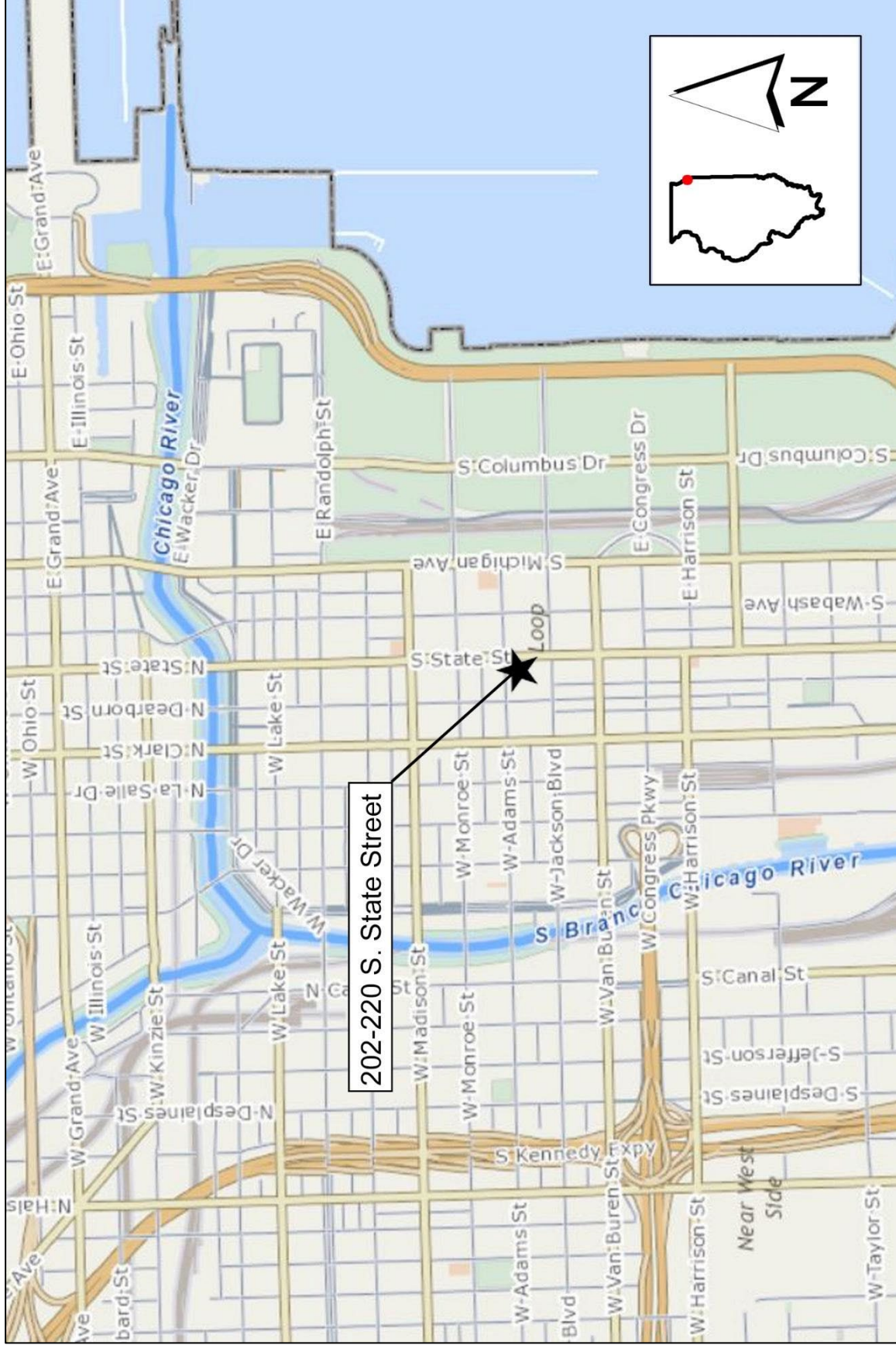


Figure 1. Project Location Map



U.S. General Services Administration

January 5, 2023

Via Email: dhunter@miamination.com

Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74355

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear Diane Hunter, THPO:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

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No Action: GSA would continue with the status quo; the buildings would remain in place, vacant with significant repairs needed, and have limited federal funds for maintenance.

Tribal Communications Plan

GSA is concurrently initiating consultation with the Illinois SHPO, the Advisory Council on Historic Preservation and other affected or interested federal, state and local agencies and non-governmental agencies (NGOs). Our goals also strive to facilitate a process by which to conduct meaningful, informative, and equitable dialogue with Native American Tribes/Tribal Nations to understand and consider their interests, and to support socially responsible project development.

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Additionally, if you are aware of other stakeholder groups that are interested in consulting on this Undertaking, please respond with the appropriate contact information.

Thank you for your time. GSA understands that meaningful engagement is critical to maintaining a collaborative working relationship with Tribes/Tribal Nations, and therefore intends to achieve open communication, coordination, and collaboration during the project process.

Formal responses to this invitation, as well as any questions or requests for additional information, should be directed to me at regina.nally@gsa.gov.

Sincerely,



Regina A. Nally for

Regina A. Nally
Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
Chicago, IL 60604
312-848-0266 (m)

cc via email: CJ Wallace, Cultural Resources Coordinator, Illinois State Historic Preservation Office (SHPO)
Laura Lavernia, GSA Liaison, Advisory Council on Historic Preservation (ACHP)

Attachments: Figure 1. Project Location Map
Figure 2. Area of Potential Effects (APE)

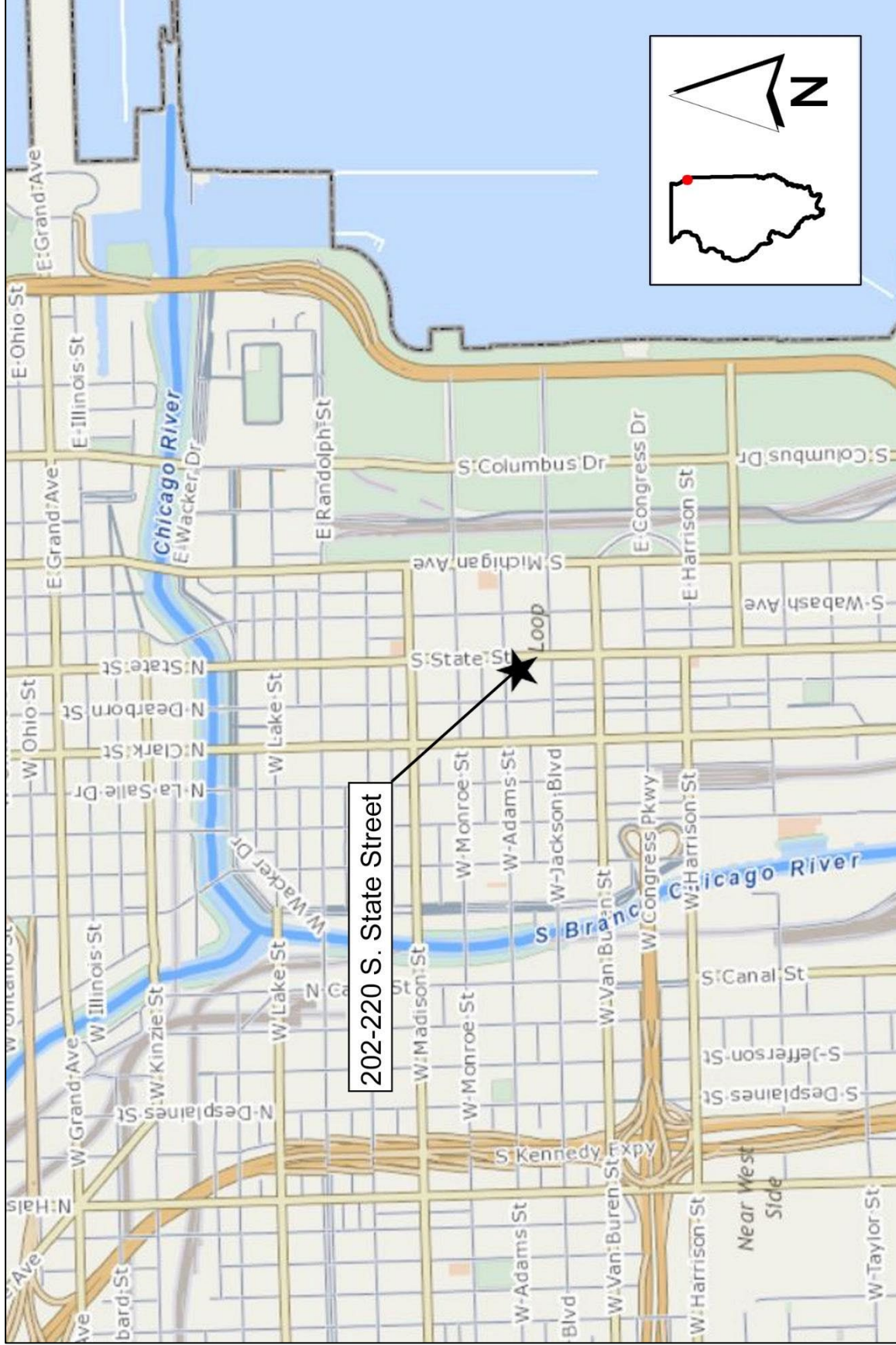


Figure 1. Project Location Map



U.S. General Services Administration

January 5, 2023

Via Email: raphaelwahwassuck@pbnation.org

Prairie Band Potawatomi Nation
16281 Q Road
Mayetta, KS 66509

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear Raphael Wahwassuck, THPO:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

Description of the Undertaking

Congress has appropriated funds for the U.S. General Services Administration (GSA) concerning 202-220 South State Street under the Consolidated Appropriations Act, 2022 (the Act), dated March 8, 2022 and signed into law by the President on March 15, 2022. On page 551 of the Act, GSA is provided specific obligational authority in the amount of \$52 million “for demolition of the buildings located at 202-220 South State Street in Chicago, Illinois, and protection of the adjacent buildings during the demolition process, securing the vacant site of the demolished buildings, and landscaping the vacant site following demolition.” At present, there are no plans to rebuild on the site. The proposed Undertaking is to address federal security vulnerabilities for the Everett M. Dirksen U.S. Courthouse, respond to congressional intent (2022 Consolidated Appropriations Act), and manage federal assets (there is no federal occupancy need for the buildings at 202-220 South State Street).

In accordance with the procedures described in 36 CFR Part 800 related to the identification of historic properties, GSA has delineated an Area of Potential Effects (APE) for the Undertaking (Figure 2), both for archaeological and above-ground resources (buildings and structures). Both APEs were developed with consideration of direct physical, visual, and contextual effects of the Undertaking, as well as foreseeable indirect effects (secondary, future, or cumulative impacts). For archaeological resources, the APE is defined to encompass all areas where the Undertaking may

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Considerations of potential impacts to archaeological, historic, and architectural resources (collectively referred to as “cultural resources”) are being considered with the support of GSA’s third-party contractor Jacobs, Inc. (Jacobs) and their cultural resources consultant Commonwealth Heritage Group (CHG).

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Tribal Communications Plan

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Regina A. Nally for

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cc via email: CJ Wallace, Cultural Resources Coordinator, Illinois State Historic Preservation Office (SHPO)
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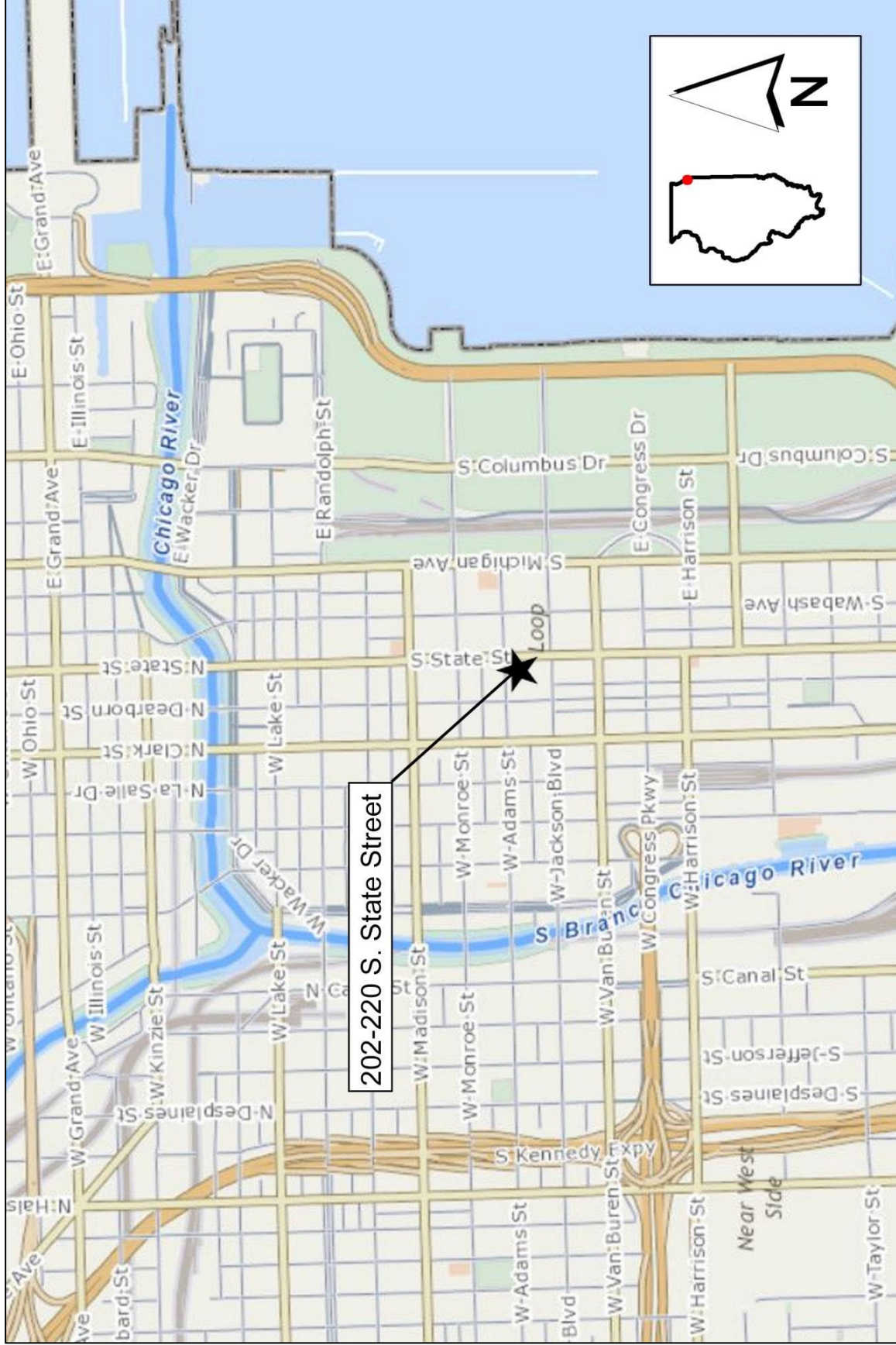


Figure 1. Project Location Map



U.S. General Services Administration

January 5, 2023

Via Email: bill.quackenbush@ho-chunk.com

Ho-Chunk Nation
PO Box 667
Black River Falls, WI 54815

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear Bill Quackenbush, THPO:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

Description of the Undertaking

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Tribal Communications Plan

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for

Regina A. Nally
Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
Chicago, IL 60604
312-848-0266 (m)

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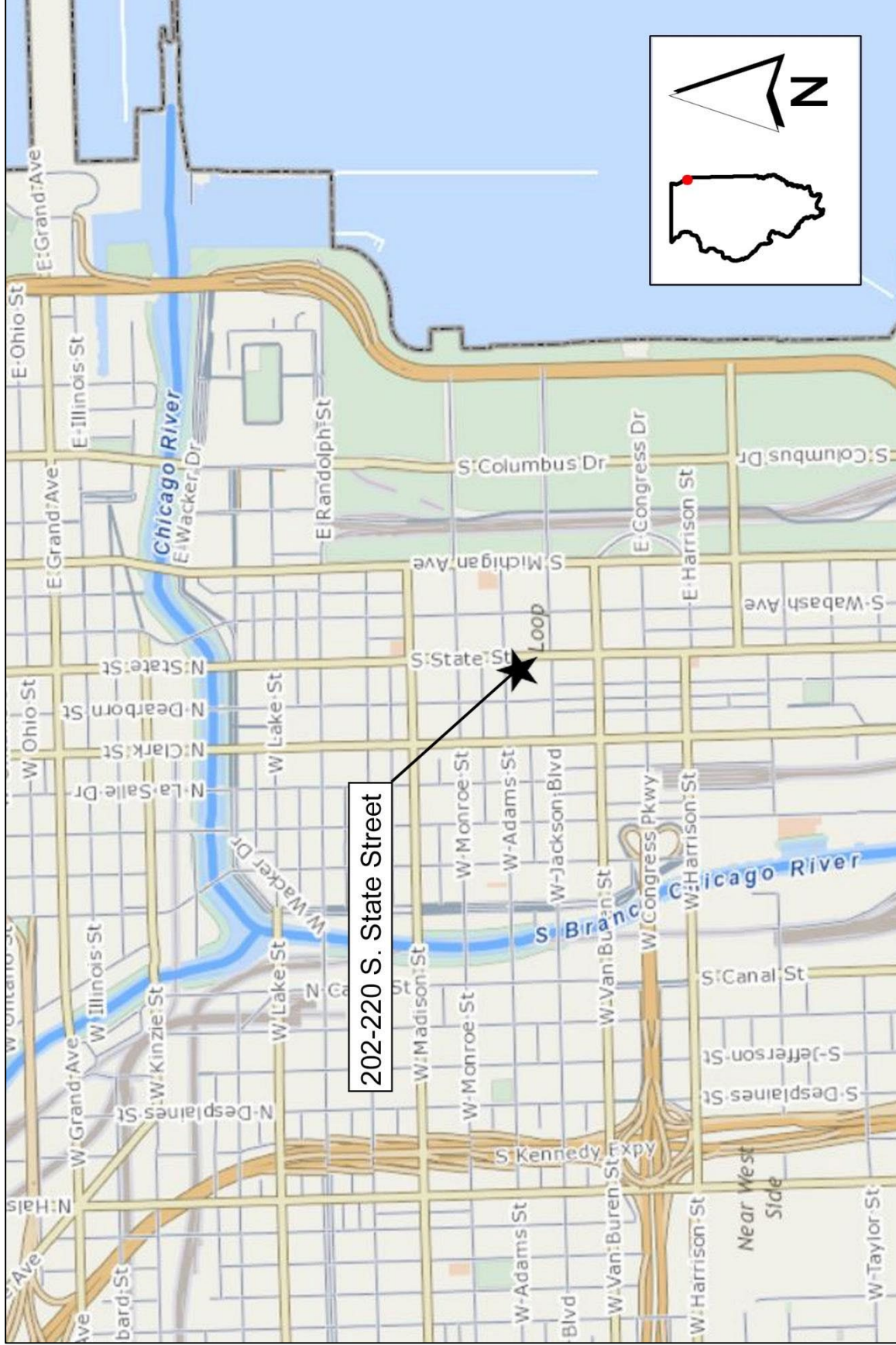
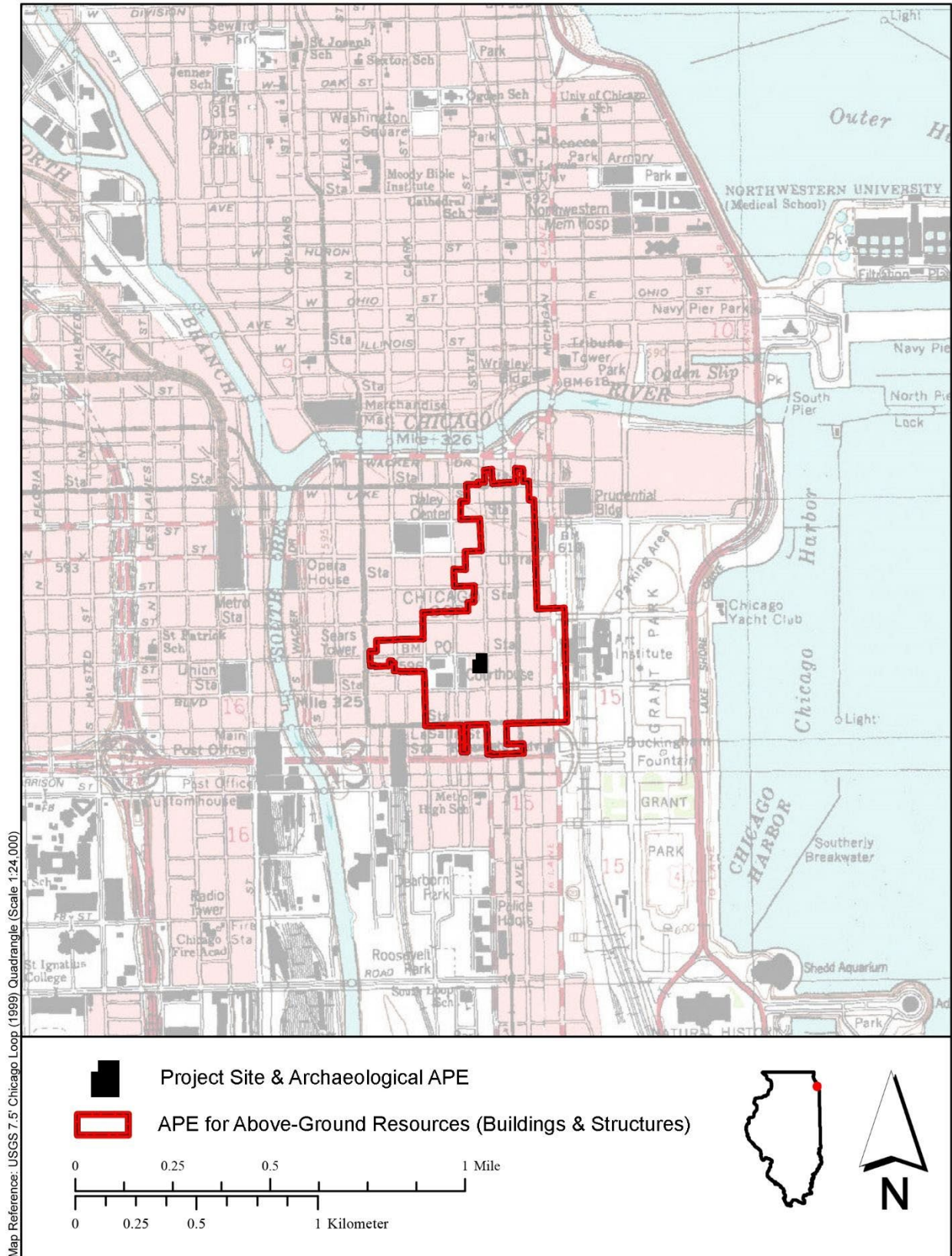


Figure 1. Project Location Map



Map Reference: USGS 7.5' Chicago Loop (1999) Quadrangle (Scale 1:24,000)

Figure 2. Area of Potential Effects



U.S. General Services Administration

January 5, 2023

Via Email: chiefharper@peoriatribes.com

Peoria Tribe of Indians of Oklahoma
118 S. Eight Tribes Trails
Miami, OK 74355

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear CHIEF CRAIG HARPER. Tribal Administrator:

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Tribal Communications Plan

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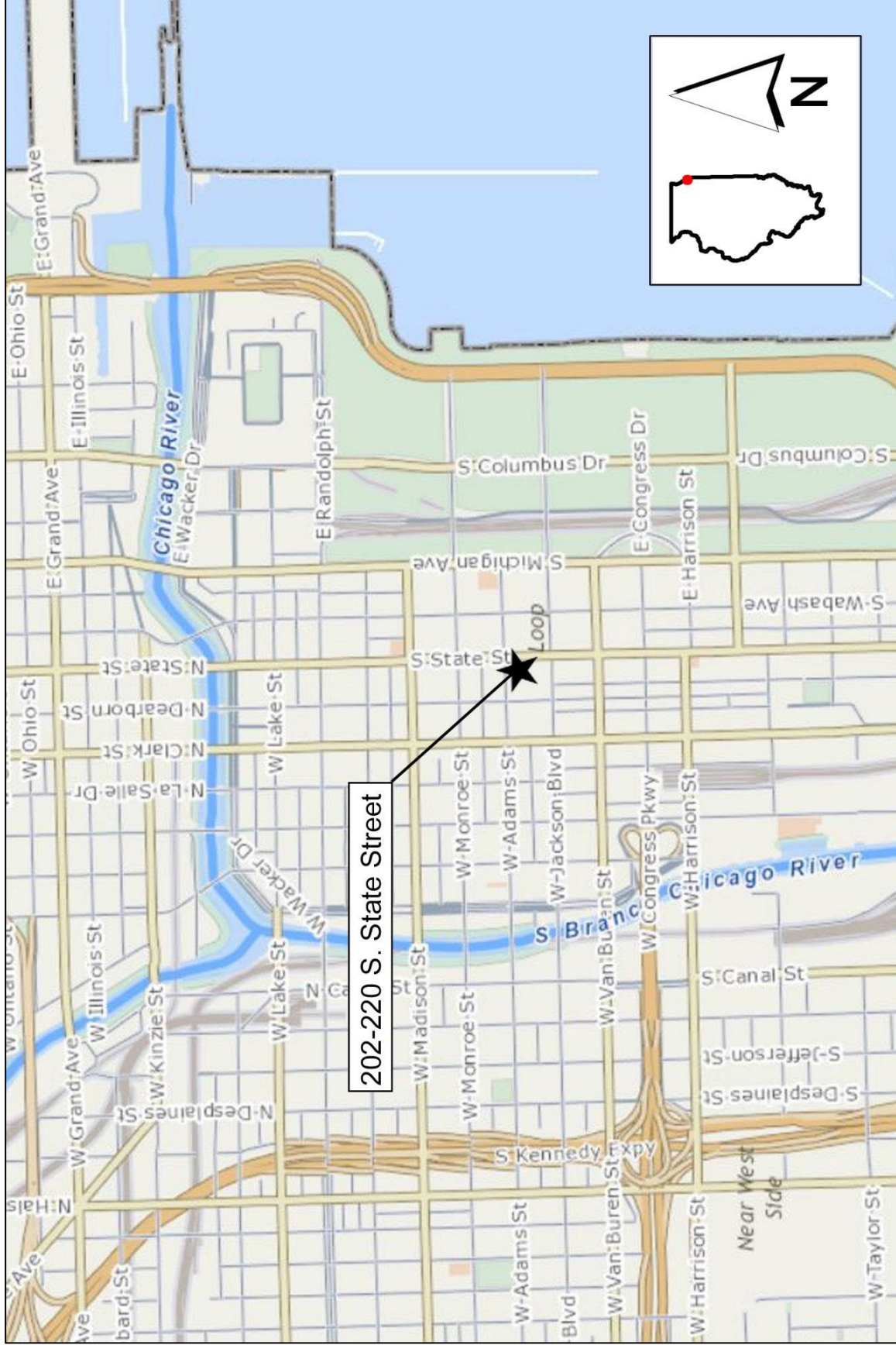


Figure 1. Project Location Map



January 5, 2023

Via Email:

Sac and Fox Nation of Mississippi in Iowa
349 Meskwaki Road
Tama, IA 52339

**Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois**

Dear Homer Bear, Jr., Chairman:

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312-848-0266 (m)

cc via email: CJ Wallace, Cultural Resources Coordinator, Illinois State Historic Preservation Office (SHPO)
Laura Lavernia, GSA Liaison, Advisory Council on Historic Preservation (ACHP)

Attachments: Figure 1. Project Location Map
Figure 2. Area of Potential Effects (APE)

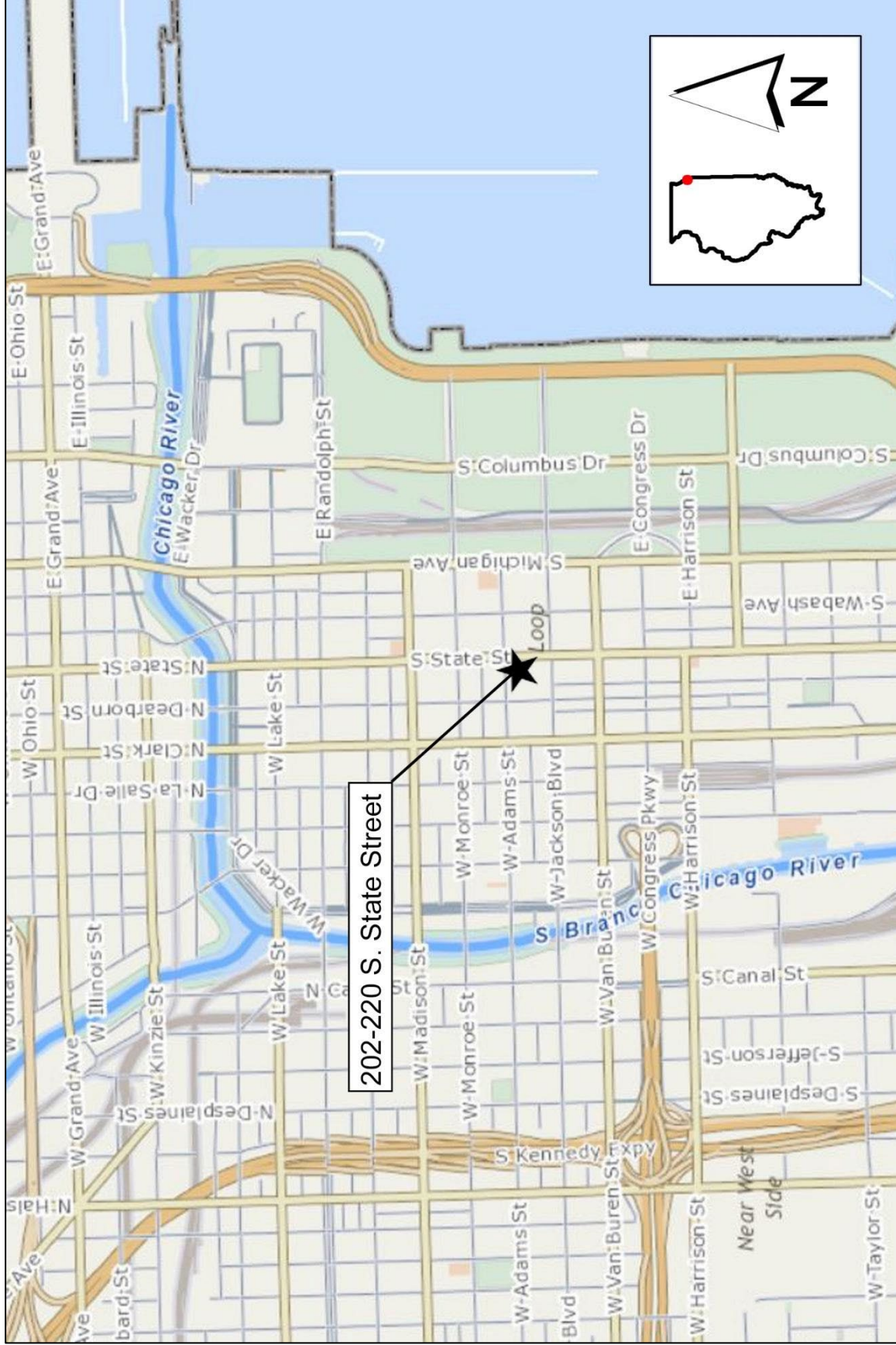


Figure 1. Project Location Map

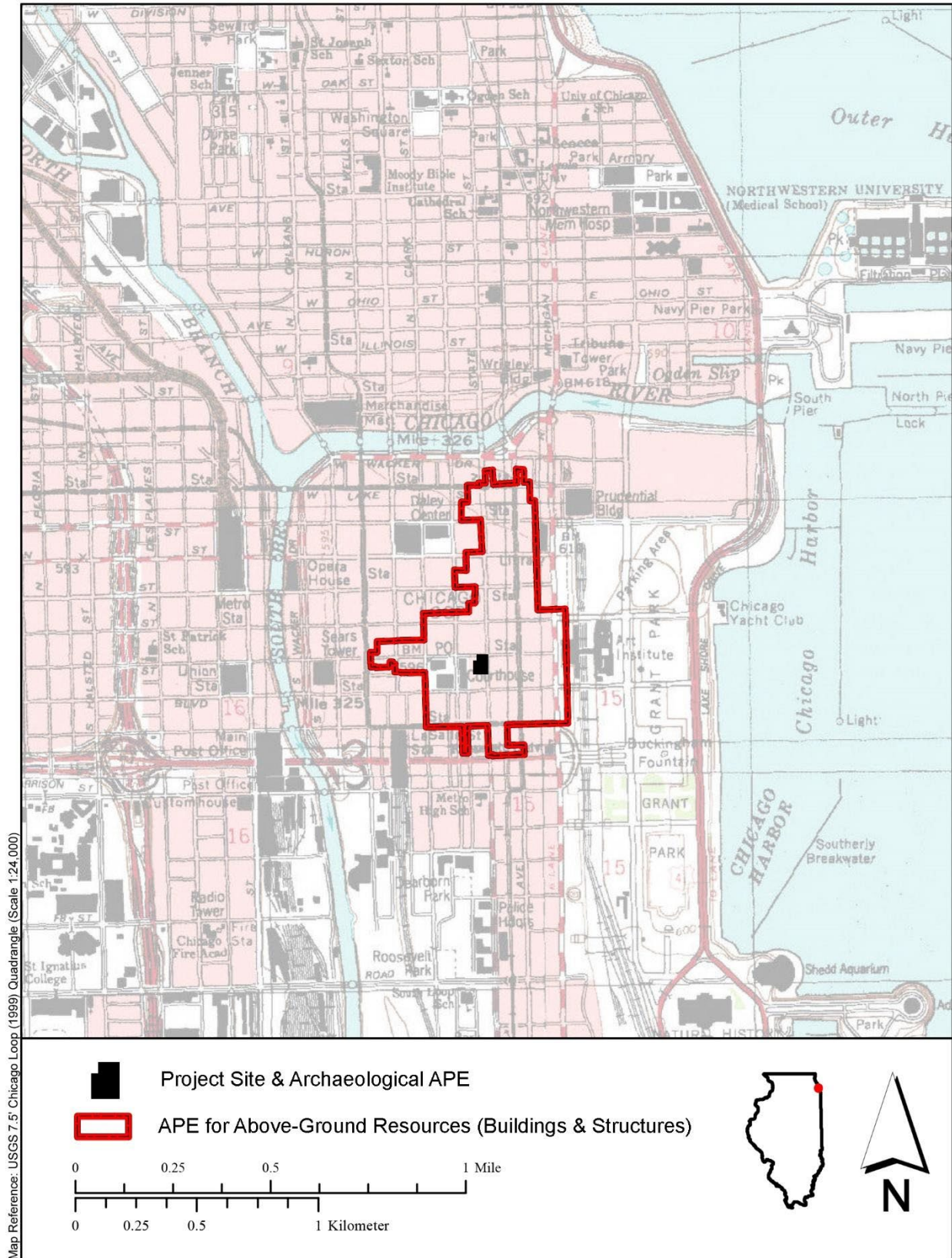


Figure 2. Area of Potential Effects



U.S. General Services Administration

January 5, 2023

Via Email: tiauna.carnes@sacandfoxks.com

Sac and Fox Nation of Missouri
305 N. Main Street
Reserve, KS 66465

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear Tiauna Carnes, Chairperson:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

Description of the Undertaking

Congress has appropriated funds for the U.S. General Services Administration (GSA) concerning 202-220 South State Street under the Consolidated Appropriations Act, 2022 (the Act), dated March 8, 2022 and signed into law by the President on March 15, 2022. On page 551 of the Act, GSA is provided specific obligational authority in the amount of \$52 million “for demolition of the buildings located at 202-220 South State Street in Chicago, Illinois, and protection of the adjacent buildings during the demolition process, securing the vacant site of the demolished buildings, and landscaping the vacant site following demolition.” At present, there are no plans to rebuild on the site. The proposed Undertaking is to address federal security vulnerabilities for the Everett M. Dirksen U.S. Courthouse, respond to congressional intent (2022 Consolidated Appropriations Act), and manage federal assets (there is no federal occupancy need for the buildings at 202-220 South State Street).

In accordance with the procedures described in 36 CFR Part 800 related to the identification of historic properties, GSA has delineated an Area of Potential Effects (APE) for the Undertaking (Figure 2), both for archaeological and above-ground resources (buildings and structures). Both APEs were developed with consideration of direct physical, visual, and contextual effects of the Undertaking, as well as foreseeable indirect effects (secondary, future, or cumulative impacts). For archaeological resources, the APE is defined to encompass all areas where the Undertaking may

cause ground disturbance. For above-ground resources, the APE includes 202-220 S. State Street and parcels adjacent to and within the viewshed of the Undertaking in all directions, where direct and indirect effects may occur. This includes the boundaries of the National Register of Historic Places-listed Loop Retail Historic District, of which both 202 and 220 S. State Street are contributing resources. Please see the attached APE maps providing more details on the site of the Undertaking and its urban context.

Considerations of potential impacts to archaeological, historic, and architectural resources (collectively referred to as “cultural resources”) are being considered with the support of GSA’s third-party contractor Jacobs, Inc. (Jacobs) and their cultural resources consultant Commonwealth Heritage Group (CHG).

As mentioned, an EIS under NEPA is being prepared concurrently. GSA has identified three preliminary alternatives to address the future of the four GSA-owned buildings located at 202, 208-212, 214, and 220 South State Street that will be evaluated during the preparation of the EIS. Additional alternatives may be identified during the NEPA and NHPA processes. The preliminary alternatives for which GSA is assessing effects to the natural and cultural environment are described as:

Demolition: GSA will assess the effects of potential demolition of the four buildings at 202, 208-212, 214, and 220 South State Street included in the 2022 Consolidated Appropriations Act. This is the Proposed Action as identified under NEPA. The funds appropriated by Congress are available only for demolition, securing the site, and landscaping. The Proposed Action includes protection of adjacent properties during demolition, securing the vacant site of the demolished buildings and landscaping of the vacant site following demolition.

Viable Adaptive Reuse: Rehabilitation or modification of some or all of the properties may be considered if they can meet the security needs of the Dirksen U.S. Courthouse. A list of reuse criteria has been developed in collaboration with the United States District Court, Northern District of Illinois, and federal law enforcement agencies. Currently, there are no federal funds available for rehabilitation, preservation, or restoration of the buildings at 202, 208-212, 214, and 220 South State Street.

No Action: GSA would continue with the status quo; the buildings would remain in place, vacant with significant repairs needed, and have limited federal funds for maintenance.

Tribal Communications Plan

GSA is concurrently initiating consultation with the Illinois SHPO, the Advisory Council on Historic Preservation and other affected or interested federal, state and local agencies and non-governmental agencies (NGOs). Our goals also strive to facilitate a process by which to conduct meaningful, informative, and equitable dialogue with Native American Tribes/Tribal Nations to understand and consider their interests, and to support socially responsible project development.

GSA invites your comments, input, and guidance regarding the Undertaking. We also welcome your interest in being involved in the Undertaking’s development. If you would like to participate in formal tribal consultation, please notify us in writing within 30 calendar days of receipt of this invitation and we will reach out to you for possible dates and times to begin discussions. If you choose to participate in Section 106 consultation, we will provide you with forthcoming draft documents for your review and comment, and you will be kept apprised of project progress, including agency

consultation and consulting parties meetings for federal, state, and local agencies and NGOs. GSA will hold an initial consulting parties meeting for these groups on **Thursday, January 19, 2023 from 1:00pm to 3:00pm CST**, in a virtual format. You are welcome to participate. A follow-up email with a link to the virtual meeting will be provided if you indicate you are interested in participating in either this initial meeting or future consulting parties meetings.

Additionally, if you are aware of other stakeholder groups that are interested in consulting on this Undertaking, please respond with the appropriate contact information.

Thank you for your time. GSA understands that meaningful engagement is critical to maintaining a collaborative working relationship with Tribes/Tribal Nations, and therefore intends to achieve open communication, coordination, and collaboration during the project process.

Formal responses to this invitation, as well as any questions or requests for additional information, should be directed to me at regina.nally@gsa.gov.

Sincerely,



for

Regina A. Nally
Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
Chicago, IL 60604
312-848-0266 (m)

cc via email: CJ Wallace, Cultural Resources Coordinator, Illinois State Historic Preservation Office (SHPO)
Laura Lavernia, GSA Liaison, Advisory Council on Historic Preservation (ACHP)

Attachments: Figure 1. Project Location Map
Figure 2. Area of Potential Effects (APE)

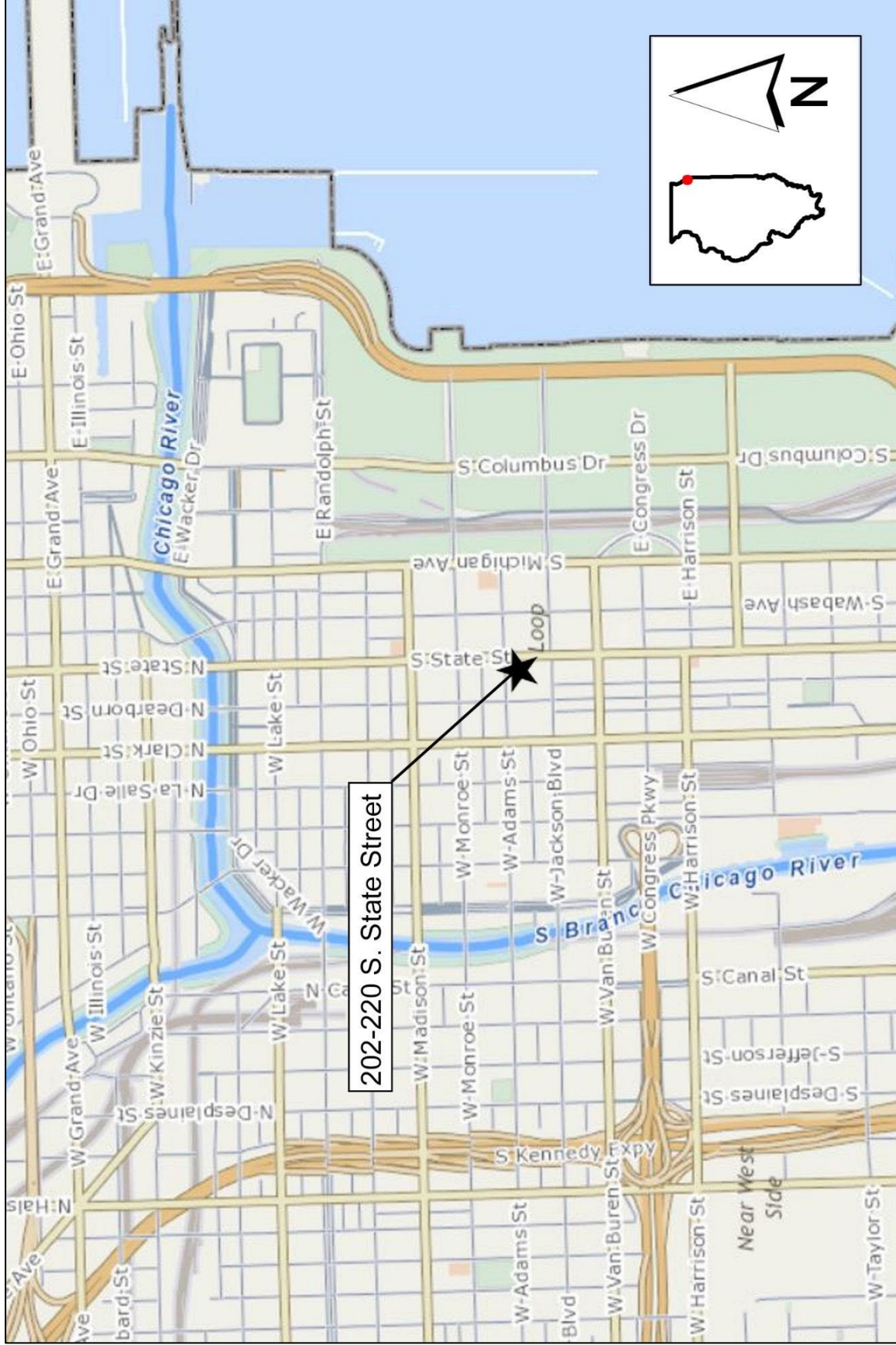


Figure 1. Project Location Map



January 5, 2023

Via Email: smassey@sacandfoxnation-nsn.gov

Sac and Fox Nation of Oklahoma
Route 2, Box 246
Stroud, OK 74079

Subject: Initial Tribal Notification for Section 106 Consultation Pursuant to the National Historic Preservation Act and Consultation under the National Environmental Policy Act
Project - 202 to 220 South State Street, Chicago, Cook County, Illinois

Dear Sandra Massey, THPO:

The U.S. General Services Administration (GSA) is initiating consultation with Native American tribes under the National Historic Preservation Act (NHPA) pursuant to 36 CFR 800.3 regarding the subject GSA-owned properties. The subject properties are located in Chicago, Cook County, Illinois bounded by Adams Street on the North, State Street on the west, Quincy Court on the south and the Everett M. Dirksen U.S. Courthouse located on Dearborn Street immediately east of the properties (Figure 1). GSA is pursuing our obligations under NHPA, while concurrently executing a Environmental Impact Statement (EIS) required under the National Environmental Policy Act (NEPA) of 1970. As such, this letter seeks to formally initiate consultation between your Government and the U.S. Government, per Section 106 of the NHPA, among other Federal Codes, Presidential Memoranda, and treaties.

Description of the Undertaking

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As mentioned, an EIS under NEPA is being prepared concurrently. GSA has identified three preliminary alternatives to address the future of the four GSA-owned buildings located at 202, 208-212, 214, and 220 South State Street that will be evaluated during the preparation of the EIS. Additional alternatives may be identified during the NEPA and NHPA processes. The preliminary alternatives for which GSA is assessing effects to the natural and cultural environment are described as:

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Tribal Communications Plan

GSA is concurrently initiating consultation with the Illinois SHPO, the Advisory Council on Historic Preservation and other affected or interested federal, state and local agencies and non-governmental agencies (NGOs). Our goals also strive to facilitate a process by which to conduct meaningful, informative, and equitable dialogue with Native American Tribes/Tribal Nations to understand and consider their interests, and to support socially responsible project development.

GSA invites your comments, input, and guidance regarding the Undertaking. We also welcome your interest in being involved in the Undertaking’s development. If you would like to participate in formal tribal consultation, please notify us in writing within 30 calendar days of receipt of this invitation and we will reach out to you for possible dates and times to begin discussions. If you choose to participate in Section 106 consultation, we will provide you with forthcoming draft documents for your review and comment, and you will be kept apprised of project progress, including agency

consultation and consulting parties meetings for federal, state, and local agencies and NGOs. GSA will hold an initial consulting parties meeting for these groups on **Thursday, January 19, 2023 from 1:00pm to 3:00pm CST**, in a virtual format. You are welcome to participate. A follow-up email with a link to the virtual meeting will be provided if you indicate you are interested in participating in either this initial meeting or future consulting parties meetings.

Additionally, if you are aware of other stakeholder groups that are interested in consulting on this Undertaking, please respond with the appropriate contact information.

Thank you for your time. GSA understands that meaningful engagement is critical to maintaining a collaborative working relationship with Tribes/Tribal Nations, and therefore intends to achieve open communication, coordination, and collaboration during the project process.

Formal responses to this invitation, as well as any questions or requests for additional information, should be directed to me at regina.nally@gsa.gov.

Sincerely,



for

Regina A. Nally
Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
Chicago, IL 60604
312-848-0266 (m)

cc via email: CJ Wallace, Cultural Resources Coordinator, Illinois State Historic Preservation Office (SHPO)
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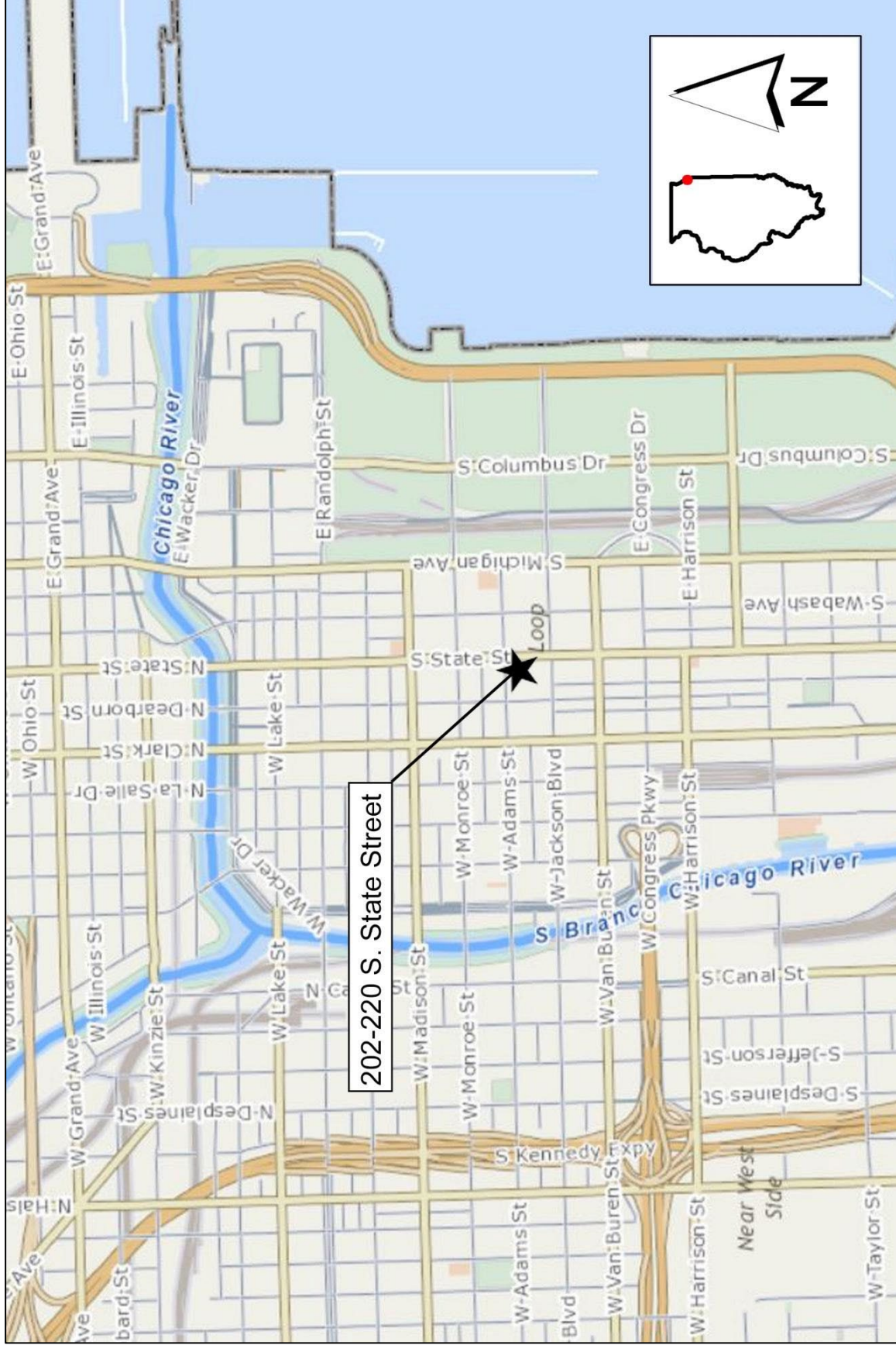


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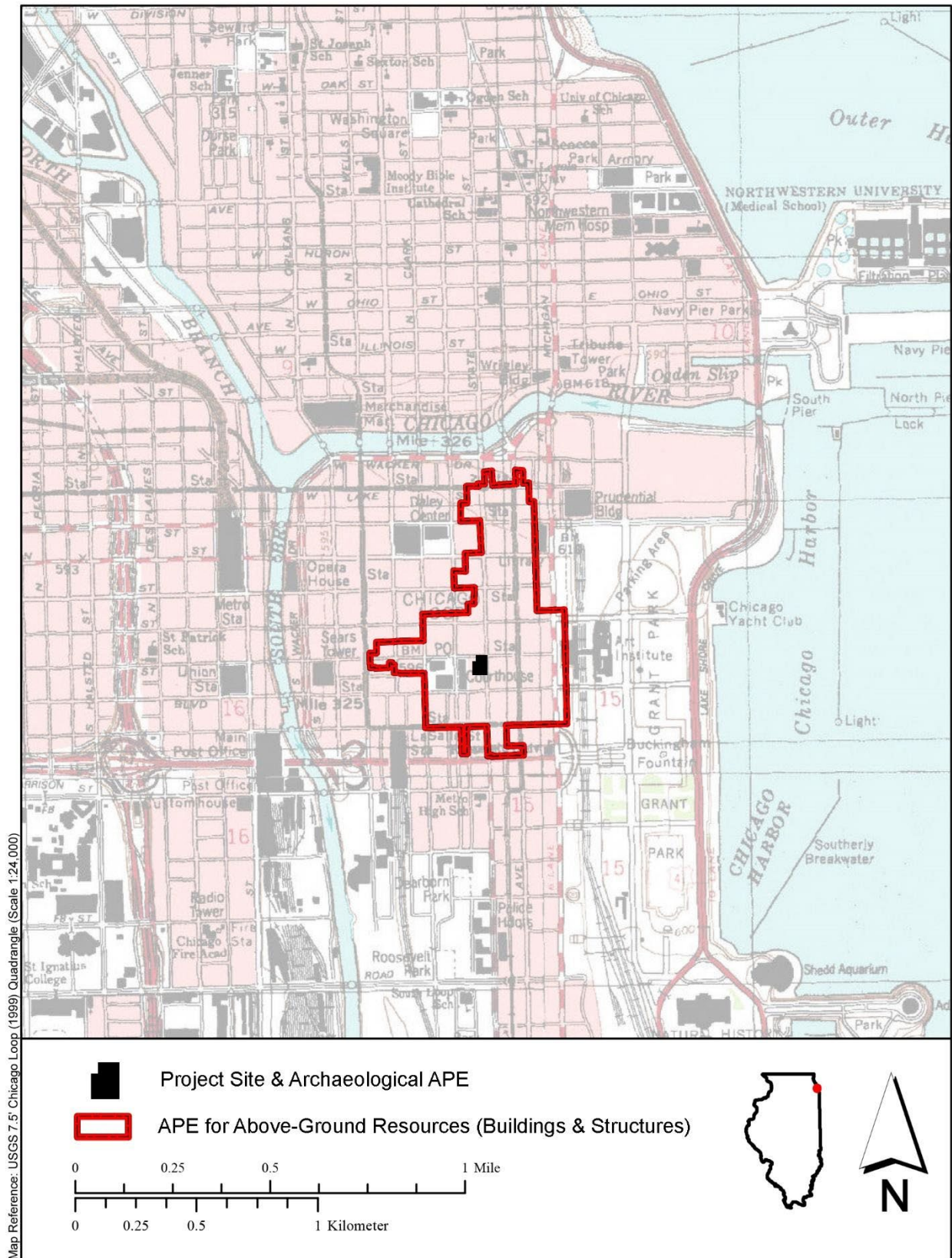


Figure 2. Area of Potential Effects



Invitation to Participate as a Consulting Party
for Section 106 Consultation under the National Historic Preservation Act

December 19, 2022

RE: Proposed GSA Undertaking with Potential to Affect Historic Properties
202 to 220 South State Street (GSA-owned Properties)
Chicago, Illinois

You are invited on behalf of the U.S. General Services Administration (GSA) to participate in the Section 106 consultation process ([36 CFR Part 800.2c](#)) as a Consulting Party regarding the subject properties. Under the guidance of the National Historic Preservation Act, Section 106 regulations *“the goal of consultation is to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties.”*

GSA is pursuing our obligation under these regulations and concurrently under the regulations of the National Environmental Policy Act (NEPA) as we seek to meet our agency mission to: address security threats to the Everett M. Dirksen U.S. Courthouse presented by the subject properties, respond to the 2022 Consolidated Appropriations Act, and effectively manage our GSA-owned assets. We hope consultation with your organization and numerous others will help us identify and evaluate viable opportunities that can successfully meet all these objectives.

Due to the large number of interested organizations who have requested to serve as a Consulting Party, our invitation to interested organizations are extended to one representative of an invited organization or consortium. This allows a balanced and manageable dialogue among stakeholders. With this in mind, each organization should name a primary and an alternate designee to participate in consulting party meetings. The alternate would serve whenever the primary designee is unable to attend. Should neither of the official designees be able to attend a meeting, a proxy can be shared with GSA at that time. Federally recognized tribes are being invited to consult with GSA separately.

GSA will hold our first consulting parties meeting on **Thursday, January 19, 2023 from 1:00pm to 3:00pm CST**, in a virtual format. A follow-up email with a link to our virtual meeting on January 19th will be sent to the primary and alternate contact identified on the form below, which we ask you to return to us. Should the primary participant be unable to attend, the alternate will have the meeting information as backup. We request that you return the completed form to GSA at your earliest convenience. This meeting will set the foundation for consultation activities going forward including:

- Provide an opportunity for the GSA project team and designated consulting party representatives to meet each other,
- Discuss the roles and responsibilities of consulting parties within the objectives of the Section 106 process,
- Review GSA’s purpose and need which has resulted in the proposed Undertaking,
- Review the objectives of consultation, e.g. avoiding, minimizing and/or mitigating adverse effects to historic properties,
- Introduce GSA’s proposed Area of Potential Effects (APE) for this Undertaking to the consulting parties,

- Propose a regular schedule for consulting parties meetings going forward, and
- Conclude with a round of Q&A among participants.

Additional information about the consultation process is available online at:

<https://www.achp.gov/digital-library-section-106-landing/citizens-guide-section-106-review>.

We respectfully request that you complete the enclosed Consulting Party Confirmation Form and forward it to GSA at our project email statestreet@gsa.gov within 30 days of receipt of this letter. If you have questions or comments related to the Undertaking, please contact me or Joe Mulligan at the same email: statestreet@gsa.gov.

Sincerely,

Regina A. Nally
 Historic Preservation Officer
 GSA, Great Lakes Region

cc:

Government and Not-for-Profit Organizations Invited to Consult

Illinois State Historic Preservation Office
 Advisory Council on Historic Preservation
 National Park Service, National Historic Landmarks Program
 U.S. District Court for the Northern District of Illinois
 U.S. Court of Appeals for the Seventh Circuit
 Administrative Office of the U.S. Courts
 U.S. Marshals Service, Dept. of Justice
 U.S. Bureau of Alcohol, Tobacco and Firearms, Dept. of Justice
 U.S. Federal Protective Service, Dept. of Homeland Security
 U.S. Environmental Protection Agency
 City of Chicago, Dept. of Planning and Development
 City of Chicago, Commission on Chicago Landmarks/Historic Preservation Div. of DPD
 City of Chicago, Alderman Brendan Reilly
 National Trust for Historic Preservation
 Landmarks Illinois
 Preservation Chicago
 Chicago Collaborative Archives Center
 AIA Chicago
 AIA Illinois
 The Berghoff Restaurant
 Chicago Loop Alliance
 BOMA, Chicago Chapter

Consulting Party Confirmation Form – Please respond within 30 days of the date of this letter.

Lead Federal Agency: General Services Administration (GSA)
Undertaking for the properties at: 202 - 220 S. State Street, Chicago, Illinois

Please check the appropriate response in the box below.

Name/Organization of Invitee	I am/We are interested in participating in this project as a consulting party. Further consultation is requested.	I/We have no interest in being a consulting party for this project. No further consultation is required.
	<input type="checkbox"/>	<input type="checkbox"/>

If you have chosen to **participate in consultation**, please provide contact information below and indicate your preferred means of communication.

PRIMARY DESIGNEE

Name:

Organization:

Mailing Address:

Phone:

Email:

ALTERNATE DESIGNEE

Name:

Organization:

Mailing Address:

Phone:

Email:

Please return via email to: statestreet@gsa.gov

From: [Benjamin Rhodd](#)
To: [Mykytiuk, Carla](#)
Subject: [EXTERNAL] RE: First Section 106 Consulting Party Meeting for GSA Properties: 202-220 S. State Street - January 19, 2023, 1 PM -3 PM
Date: Tuesday, January 17, 2023 2:54:36 PM

Ms. Mykytiuk,

Pursuant to consultation under Section 106 of the National Historic Preservation Act (1966 as amended) the Forest County Potawatomi Community (FCPC), a Federally Recognized Native American Tribe, reserves the right to comment on Federal undertakings, as defined under the act.

The Tribal Historic Preservation Office (THPO) staff has reviewed the information you provided for this project. Upon review of site data and supplemental cultural history within our Office, the FCPC THPO is pleased to offer a finding of No Historic Properties affected of significance to the FCPC, however, we request to remain as a consulting party for this project.

As a standard caveat sent with each proposed project reviewed by the FCPC THPO, the following applies. In the event an Inadvertent Discovery (ID) occurs at any phase of a project or undertaking as defined, and human remains or archaeologically significant materials are exposed as a result of project activities, work should cease immediately. The Tribe(s) must be included with the SHPO in any consultation regarding treatment and disposition of an ID find.

Thank you for protecting cultural and historic properties and if you have any questions or concerns, please contact me at the email or number listed below.

Respectfully,

Ben Rhodd, MS, RPA, Tribal Historic Preservation Officer
Forest County Potawatomi
Historic Preservation Office
8130 Mish ko Swen Drive, P.O. Box 340, Crandon, Wisconsin 54520
P: 715-478-7354 C: 715-889-0202 Main: 715-478-7474
Email: Benjamin.Rhodd@fcp-nsn.gov
www.fcpotawatomi.com

From: Mykytiuk, Carla <Carla.Mykytiuk@jacobs.com>
Sent: Saturday, January 14, 2023 10:34 AM
To: Mykytiuk, Carla <Carla.Mykytiuk@jacobs.com>
Subject: FW: First Section 106 Consulting Party Meeting for GSA Properties: 202-220 S. State Street - January 19, 2023, 1 PM -3 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

We apologize that you may have received a previous email regarding the upcoming S. 106 Consulting Party meeting. Please disregard as it was premature. This is the correct version.

Thank you for agreeing to be a Consulting Party for the GSA Properties: 202-220 S. State Street.

In advance of our meeting next Thursday, January 19, 2023, from 1 PM to 3 PM, we wanted to provide the attached materials for your consideration. We encourage you to review this information before the meeting to help us ensure a productive discussion.

Should you have questions prior to the January 19th meeting, please reach out via our project email, which is monitored regularly by GSA's project team, at: statestreet@gsa.gov.

A link to the virtual meeting will be provided in a separate email early next week.

Thank you,

Carla

Carla Mykytiuk, M.P.A. | Public Involvement Lead and Planner | People & Places Solutions
Jacobs | office: 773.458.2842 | mobile: 847.708.4878
525 West Monroe | Suite 1600 | Chicago
carla.mykytiuk@jacobs.com | www.jacobs.com

NOTICE - This communication may contain confidential and privileged information that is for the sole use of the intended recipient. Any viewing, copying or distribution of, or reliance on this message by unintended recipients is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.



Miami Tribe of Oklahoma

3410 P St. NW, Miami, OK 74354 • P.O. Box 1326, Miami, OK 74355
Ph: (918) 541-1300 • Fax: (918) 542-7260
www.miamination.com



Via email: regina.nally@gsa.gov

January 23, 2023

Regina A. Nally
Historic Preservation Officer
U.S. General Services Administration
Public Buildings Service, Great Lakes Region 230 S. Dearborn, Suite 3600
Chicago, IL 60604

Re: 202-220 South State Street Project, Cook County, Illinois – Comments of the Miami Tribe of Oklahoma

Dear Ms. Nally:

Aya, kweehsitoolaani– I show you respect. The Miami Tribe of Oklahoma, a federally recognized Indian tribe with a Constitution ratified in 1939 under the Oklahoma Indian Welfare Act of 1936, respectfully submits the following comments regarding 202-220 South State Street Project in Cook County, Illinois.

The Miami Tribe offers no objection to the above-referenced project at this time, as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site. However, given the Miami Tribe's deep and enduring relationship to its historic lands and cultural property within present-day Illinois, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case, please contact me at 918-541-8966 or by email at THPO@miamination.com to initiate consultation.

The Miami Tribe accepts the invitation to serve as a consulting party to the proposed project. In my capacity as Tribal Historic Preservation Officer I am the point of contact for consultation.

Respectfully,

Diane Hunter
Tribal Historic Preservation Officer



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
www.dnr.illinois.gov

JB Pritzker, Governor
Colleen Callahan, Director

**Cook County
Chicago
Demolition of Properties
202-220 S. State St.**

GSA, SHPO Log #005030515

December 13, 2022

**Regina Nally
U.S. General Services Administration
230 S. Dearborn St.
Chicago, IL 60604-1696**

Dear Regina,

Thank you for your correspondence of October 12, 2022, regarding the proposed Area of Potential Effects (APE) for SHPO Log #005030515, located at 202-220 S. State St. in Chicago. We suggest that the APE for this undertaking include the boundaries of the Loop Retail Historic District, which was listed to the National Register of Historic Places (NRHP) on November 27, 1998. This project has the potential to affect the District as a whole, in addition to the historic buildings included in the project and their immediate surroundings.

We look forward to the next step in consultation. Please contact CJ Wallace if you have questions (217-787-5027 or carol.wallace@illinois.gov).

Sincerely,

A handwritten signature in black ink that reads "Carey L. Mayer".

**Carey L. Mayer, AIA
Deputy State Historic Preservation Officer
CLM**



Cook County

Chicago

Demolition of 202-220 S. State

220 S State, Consumers Building, contributing to Loop Retail HD on NRHP

214 S. State St., Martin Jewelers, NC to Loop Retail HD (DOE)

212 S. State St., NC to Loop Retail HD on NRHP

202 S. State St. Century Building, contributing to Loop Retail HD on NRHP

GSA, SHPO Log #005030515

March 24, 2023

Regina Nally

U.S. General Services Administration

230 S. Dearborn St.

Chicago, IL 60604-1696

Dear Ms. Nally:

GSA's revision to the APE, shared with us in an email on March 16th, addresses our previous comments. We concur that the revised APE is appropriate for the undertaking and sufficiently encompasses the geographic area where effects to historic properties could occur. We have no further comments on the APE.

Sincerely,

A handwritten signature in cursive script that reads "Carey L. Mayer".

Carey L. Mayer, AIA

Deputy State Historic Preservation Officer

CLM

Jordan E. Tannenbaum
Vice Chairman

Reid J. Nelson
Executive Director, Acting



December 23, 2022

The Honorable Robin Carnahan
Administrator
U.S. General Services Administration (GSA)
1800 F Street, NW
Washington, DC 20405

Ref: *Proposed Demolition of 202-220 South State Street
Chicago, Cook County, Illinois
ACHP Project Number: 018203*

Dear Administrator Carnahan:

On December 16, 2022, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the initiation of the Section 106 consultation regarding the referenced undertaking. Based upon the information you provided, we have concluded that our participation in the consultation is appropriate at this time. Our decision to participate in consultation is based on the *Criteria for Council Involvement in Reviewing Section 106 Cases* contained within regulations, "Protection of Historic Properties" (36 CFR Part 800), implementing Section 106 of the National Historic Preservation Act. The criteria are met because the undertaking may have substantial impacts on historic properties, and the consultation may raise policy and procedural questions.

Section 800.2(b)(1) of these regulations requires that we notify you as the head of the federal agency of our decision to participate in consultation. By copy of this letter we are also informing Regina Nally, Regional Preservation Officer, and Beth Savage, GSA Federal Preservation Officer, of our decision.

Our participation in this consultation will be handled by Laura Lavernia who can be reached at (202) 517-0225 or by e-mail at llavernia@achp.gov. Please reference the ACHP Project Number above.

We look forward to working with your agency and other consulting parties to reach agreement on appropriate measures to avoid, minimize, or mitigate potential adverse effects on historic properties.

Sincerely,

Reid J. Nelson
Executive Director, Acting

1 **B3. List of Consulting Parties**

Appendix B3. List of Consulting Parties

Federal, State, and Local Government

- Anthony Rubano, Illinois State Historic Preservation Office/Illinois Department of Natural Resources
- Mark Buechel, AIA, National Park Service
- Laura Lavernia, GSA Liaison, Advisory Council on Historic Preservation
- Kelly Fanizzo, Advisory Council on Historic Preservation
- Kathy Kowal, Environmental Protection Agency
- Chief Judge Rebecca Pallmeyer, U.S. District Court, Northern District of Illinois
- Clarke Devereux, U.S. District Court, Northern District of Illinois, Chief Deputy Clerk
- Tom Bruton, Clerk of Court, U.S. District Court, Northern District of Illinois
- Traci Murray, U.S. District Court, Northern District of Illinois
- Sarah Schrup, Circuit Executive, U.S. Court of Appeals for the Seventh Circuit
- Victoria Kahle, U.S. Court of Appeals for the Seventh Circuit
- Keira Unterzuber, Administrative Office of the U.S. Courts
- LaDon Reynolds, U.S. Marshal Service, Department of Justice
- Maurice D. Cox, Commissioner, City of Chicago Planning and Development
- Cynthia Roubik, City of Chicago Planning and Development
- Dijana Cuvalo, AIA, City of Chicago – CCL – Historic Preservation Division, Bureau of Citywide Systems and Historic Preservation
- Kandalyn Hahn, Commission on Chicago Landmarks
- Brendan Reilly, 42nd Ward Alderman, City of Chicago – Alderman Brendan Reilly
- Eiliesh Tuffy
- Will Panoke, U.S. Bureau of Alcohol Tobacco and Firearms, Department of Justice
- Robert Cantrell, U.S. Federal Protective Service, Department of Homeland Security

Native American Tribes

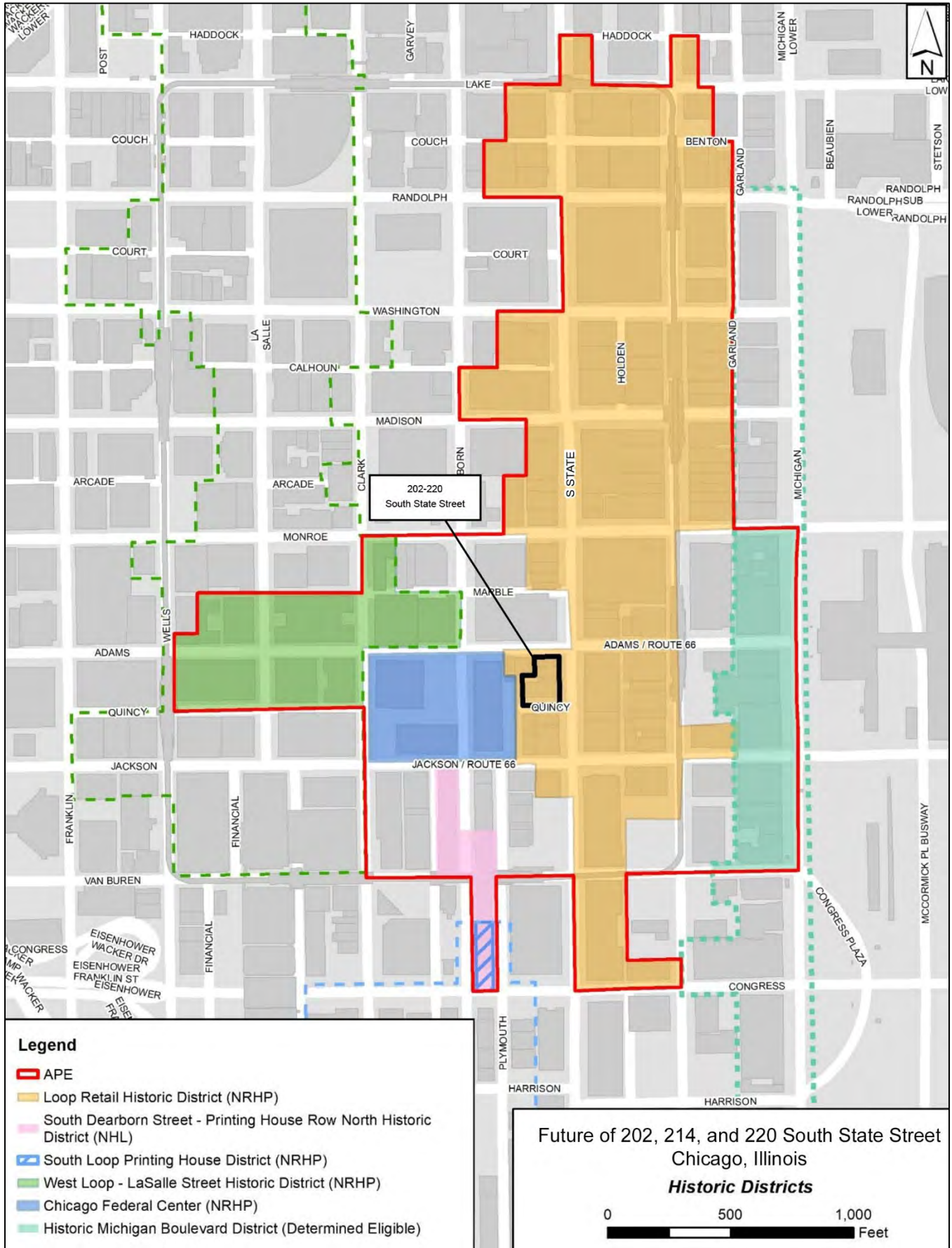
- Kelli Mosteller, Tribal Historic Preservation Officer (THPO), Citizen Potawatomi Nation, Oklahoma
- Ben Rhodd, THPO, Forest County Potawatomi Community of Wisconsin
- Kenneth Meshigaud, Chairperson, Hannahville Indian Community, Michigan
- Darwin Kaskaske, Chairman, Kickapoo Tribe of Oklahoma
- Melissa Wiatroluk, THPO, Little Traverse Bay Bands of Odawa Indians, Michigan

- David Grignon, THPO, Menominee Indian Tribe of Wisconsin
- Diane Hunter, THPO, Miami Tribe of Oklahoma
- Raphael Wahwassuck, THPO, Prairie Band Potawatomi Nation
- Bill Quackenbush, THPO, Ho-Chunk Nation
- Burgundy Fletcher, Historic Preservation Specialist, Peoria Tribe of Indians of Oklahoma
- Homer Bear, Jr., Chairperson
- Tiauna Carnes, Chairperson
- Sandra Massey, THPO

Other Stakeholders

- Jennifer Sandy, Sr. Field Director, National Trust for Historic Preservation
- Ward Miller, Executive Director, Preservation Chicago
- Kendra Parzen, Landmarks Illinois
- Frank Butterfield, Landmarks Illinois
- Joan Pomaranc, Hon. AIA Chicago, Senior Director of Advocacy and Special Projects, AIA Chicago
- Anna McFarland, Communications and Engagement Manager, AIA Illinois
- Peter Berghoff, The Berghoff Restaurant
- Michael Edwards, Chicago Loop Alliance
- Alek Juanzemis, Chicago Loop Alliance
- Rob Johnson, Director of Civic Engagement, Building Owners and Managers Association (BOMA), Chicago
- Chris Jakubowski, BOMA, Chicago
- Holly Fiedler, Province Archivist, Chicago Collaborative Archives Center
- Dr. Malachy McCarthy, PhD, Chicago Collaborative Archives Center
- Christopher M. Allison, McGreal Center for Dominican Historical Studies at Dominican University
- Kevin Harrington, Mies van der Rohe Society of the Illinois Institute of Technology
- Brie Matin, Provincial Archivist, Our Lady of Guadalupe Province
- Brad White, Interested Party

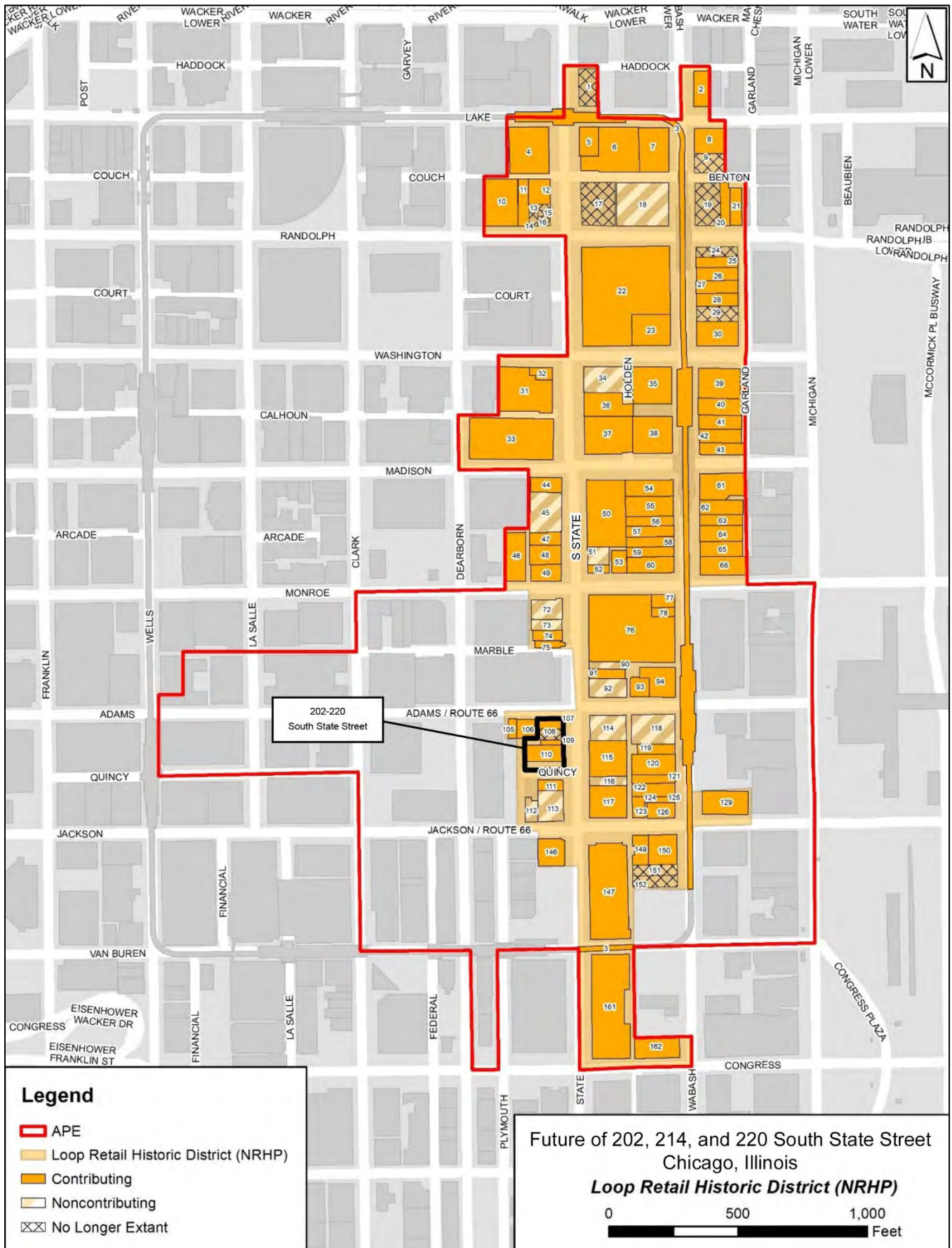
1 **B4. Inventory of Resources in the**
2 **Area of Potential Effects**



Map 1. Historic Districts in the APE

Table 1. Historic Districts in the APE

District Name	Location/Boundary	Relation to APE	NRHP Qualification	Period of Significance	Preliminary Effects Assessment
Loop Retail Historic District NRHP #98001351	Roughly bounded by Lake St, Wabash Ave, Ida B. Wells Dr, and State St.	The entirety of the historic district is included in the APE.	Criteria A (Events) and C (Design)	1872-1949	<i>Alternative A: Adverse Effects</i> Alternative B: No Adverse Effects Alternative C: No Adverse Effects
South Dearborn Street-Printing House Row North Historic District NRHP #76000705	South Dearborn Street between Jackson Blvd, Plymouth Ct., Ida B. Wells Dr., and Federal St.	The entirety of the historic district is included in the APE.	Criteria A (Events) and C (Design) Also a National Historic Landmark	1889-1896	Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
South Loop Printing House District NRHP #78001130	Roughly bounded by Wells, Polk, Taylor and State Sts., and Ida B. Wells Dr.	Only the northernmost two properties within the historic district are included in the APE.	Criteria A (Events) and C (Design)	1883-1928	Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
West Loop-LaSalle Street Historic District NRHP #12001238	Roughly bounded by Wacker Dr., Wells, Van Buren, and Clark Sts.	The properties included in the APE are roughly bounded by Marble Pl., Wells, Quincy, and Dearborn Sts.	Criteria A (Events) and C (Design)	1873-1962	Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
Historic Michigan Boulevard District SHPO Reference #305968	Michigan Ave. from 11th St. to Randolph St.	Only the portion of the historic district north of Van Buren St. and south of Monroe St. is included in the APE.	Determined Eligible Also a Chicago Landmark	1882 - 1930	Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
Chicago Federal Center NRHP #8001165	Block bounded by Jackson Blvd., Clark, Adams, and Dearborn Sts., and the contiguous half-block east of Dearborn St.	The entirety of the historic district is included in the APE.	Criteria A (Events) and C (Design); Criteria Consideration G (Age)	1959-1974	<i>Alternative A: Adverse Effects</i> Alternative B: No Adverse Effects Alternative C: No Adverse Effects



Map 2. Loop Retail Historic District

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
1	Tuttle Building (6 East Lake Building)	201 N State St/6 E Lake St	Loft Building/Retail	1872; John Mills Van Osdel 1913; H. B. Wheelock (reconstruction, new facades)	Chicago Style	Contributing (at time of NRHP listing) Building is no longer extant (replaced c. 2010)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
2	Old Dearborn Bank Building	201-209 N Wabash Ave	Office/Bank Building	1926; C. W. and G. L. Rapp, with Lieberman & Hein as engineers	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
3	Chicago Union Loop Elevated Structure and Stations	Lake St, Wabash Ave, Van Buren St, and Wells St Sections within historic district: 1. From State and Lake east to Wabash then south to half a block south past Jackson 2. Half-block section from State and Van Buren east to an alley	Elevated Rail Structure and Stations	1897; John Alexander Low Waddell (elevated structure), A. M. Hedley (original stations)	Classical Revival (original stations)	Contributing The entirety of the elevated rail in the Loop is individually Determined Eligible (SHPO Reference #137218)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
4	State-Lake Building (WLS-TV)	174-186 N State St/1-19 W Lake St	Theater/Office Building	1917; C. W. and G. L. Rapp, with Lieberman & Hein as engineers 1984; Skidmore Owings & Merrill (interior renovation)	Classical Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
5	Page Brothers Building	177-191 N State St/1-3 E Lake St	Loft Building/Retail	1872; John Mills Van Osdel 1902; Hill & Woltersdorf (State Street facade) 1986; Daniel P. Coffey and Assocs. (façade restoration)	Italianate	Contributing Individually Listed (NRHP #75000649) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
6	(Balaban and Katz) Chicago Theater	175 N State St/5-23 E Lake St	Theater	1920; C. W. and G. L. Rapp, with Lieberman & Hein as engineers 1986; Daniel P. Coffey & Assocs. (restoration)	French Classical	Contributing Individually Listed (NRHP #79000822) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
7	LeMoynes Building	172-186 N Wabash Ave/25-39 E Lake St	Loft Building	1915, Mundie and Jensen	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
8	Medical and Dental Arts Building (181 North Wabash Building)	179-187 N Wabash Ave/51-63 E Lake St	Office Building	1926; Burnham Brothers	Commercial Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
9	City Club Apartments (former parking lot)	173-177 N Wabash Ave	Apartment Building Originally surveyed as a parking lot, now a c. 2020 building	2020	Commercial Style	Noncontributing Parking lot no longer extant		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
10	New United Masonic Temple and Balaban & Katz Oriental Theatre Oriental Theater	18-32 W Randolph St	Theater/Office Building	1925; C. W. and G. L. Rapp, with Lieberman & Hein as engineers	Art Deco	Contributing Individually Listed (NRHP #78003401)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
11	Old Heidelberg	14-16 W Randolph St	Restaurant	1934; Graham, Anderson, Probst and White	German Revival A large modern building was constructed behind/over the Old Heidelberg building in 2000. The Old Heidelberg façade was preserved and the new building is stepped back preserving the scale of the historic building from street level	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
12	Butler Building	162-168 N State St	Mixed Use (office, retail, studio, restaurant space)	1923; Christian A. Eckstorm	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
13	State Pawn Shop	160 North State Street	Loft Building	1872	Italianate	Noncontributing No longer extant (replaced c. 2000)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
14	Vaughan's Seed Store Building	8-10 W Randolph St	Specialty Store/Retail	1923; Holabird and Roche	Commercial	Noncontributing No longer extant (replaced c. 2000)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
15	Swarts Brothers (Roberto's)	156 N State St	Loft Building/Retail (Jewelry)	1872 c. 1900 (lower façade remodeled)	Italianate	Contributing (at time of NRHP listing) No longer extant (replaced c. 2000)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
16	---	2-6 W Randolph St	Specialty Store/Retail	c. 1955	International	Noncontributing No longer extant (replaced c. 2000)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
17	Telenews Theater (Walgreen Drugs)	151-167 N State St/2-12 E Randolph St	Theater/Retail	1939; Shaw, Naess and Murphy	Moderne	Contributing (at time of NRHP listing) No longer extant (replaced c. 2000)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
18	Parking Garage	150-168 N Wabash Ave/22-36 E Randolph St	Parking Garage	1987	Utilitarian concrete structure with subdued Post Modern details	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
19	Parkline Chicago Apartments (former parking garage)	151-169 N Wabash Ave/50-60 E Randolph St	Parking Garage	1953	---	Noncontributing No longer extant (replaced 2020)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
20	Wetten Building	62-64 E Randolph St	Specialty Store/Retail	1937; Mundie, Jensen, Bourke and Havens	Moderne	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
21	Bowen Building	66 E Randolph St	Loft Building	1872; William W. Boyington	Italianate	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
22	Marshall Field and Company Department Store	101-139 N State St/1-37 E Randolph St/2-24 E Washington St/112-138 N Wabash St	Department Store	1902-1914; D. H. Burnham and Company • 1902; Southeast corner, State & Randolph • 1906; Middle section, Wabash • 1907; Northeast corner, State & Washington • 1914; Southwest corner, Wabash & Randolph 1947 (Removal of cornice)	Chicago Style with Classical Revival details	Contributing National Historic Landmark (NRHP #78001123) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
23	Marshall Field and Company Department Store Annex	26-38 E Washington St/102-112 N Wabash Ave	Department Store/Office Building	1892; D. H. Burnham and Company, with Charles Atwood as design partner	Italian Renaissance	Contributing National Historic Landmark (NRHP #78001123) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
24	Loft Outlet (formerly Fannie May Candy; Musicland)	143-147 N Wabash Ave/51-57 E Randolph St	Specialty Store/Retail	1955	---	Noncontributing No longer extant (replaced 2004)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District




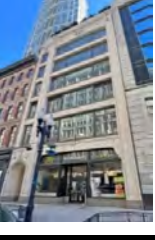


Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
25	Couch Building	139 N Wabash Ave	Loft Building	1872; John Mills Van Osdel 1920; Karl M. Vitzhum (first-floor alterations for Blackhawk Restaurant)	Italianate	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
26	Peck Building	133-137 N Wabash Ave/132-136 N Garland Ct	Loft Building	1872; John Mills Van Osdel	Renaissance Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
27	Burton Building (B. Dalton Booksellers)	129 N Wabash Ave/128 N Garland Ct	Loft Building	1877; John Mills Van Osdel 1941 (2nd-floor façade remodel)	Italianate	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
28	Porter Building (McDonald's)	125 N Wabash Ave	Loft Building	1916; Otis and Clark	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
29	(McDonald's)	115-119 N Wabash Ave	Restaurant	c. 1970	Commercial	Noncontributing No longer extant (replaced 2003)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
30	Garland Building (Staples)	101-111 N Wabash Ave/50-68 E Washington St	Office Building/Retail	1915; Christian A. Eckstorm	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District





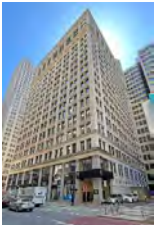

Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
31	Woolworth Building (Champs Sports; Arrowsmith Shoes)	20-30 N State St/9-21 W Washington St	Specialty Store/Retail	1928; Walter W. Ahlschlager	Classical Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
32	Reliance Building	32-36 N State St	Office Building	1890; Burnham and Root, with John Wellborn Root as design partner (foundations and base) 1895; D. H. Burnham and Company, with Charles Atwood as design partner (10-story upper addition) 1996; McClier (exterior renovation)	Chicago Style	Contributing National Historic Landmark (NRHP #70000237) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
33	Boston Store (State-Madison Building)	2-16 N State St/2-38 W Madison St /1-17 N Dearborn St	Department Store	1905-1917; Holabird and Roche 1944 (cornice removed)	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
34	Old Navy Store	27-33 N State St	Retail	1998	20th/21st Century Commercial	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
35	Marshall Field & Company Men's Store (Washington & Wabash Building)	26-36 N Wabash Ave/25-35 E Washington St	Department Store/Office Building	1911; D. H. Burnham and Company; Graham, Burnham and Company	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
36	Charles A. Stevens & Bro. Building	17-25 N State St/16-22 N Wabash Ave	Tall Shop Building	1911; D. H. Burnham and Company	Classical Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
37	Mandel Brothers Department Store (T. J. Maxx; Filene's Basement)	1-15 N State St/2-14 E Madison St	Department Store	1910; Holabird and Roche	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
38	Mandel Brothers Department Store Annex	2-14 N Wabash Ave/20-34 E Madison St	Department Store	1900; Holabird and Roche (original 9 stories) 1905; Holabird and Roche (additional 2 stories on 1900 building and 12-story Wabash addition)	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
39	Pittsfield Building	31-39 N Wabash Ave/53-65 E Washington St	Office Building/Retail	1927; Graham, Anderson, Probst and White with Alfred Shaw as design partner	Art Deco	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
40	Shops Building (Wabash Jewelers Mall)	17-25 N Wabash Ave	Loft Building	1875 (original loft building) 1911-12; Alfred S. Alschuler (façade remodel)	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
41	Commonwealth Edison Company, Garland Court Substation (New York Jewelers)	11-15 N Wabash Ave	Utility/Specialty Store Building	1931; Holabird and Root	Art Deco	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
42	Von Lengerke & Antoine Building (Jacob M. Cohen Building)	7-9 N Wabash Ave	Specialty Store/Retail	1941; Mundie, Jensen, Bourke and Havens	Art Deco	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
43	Kesner Building	1-7 N Wabash Ave/50-66 E Madison St	Office Building/Retail	1910; Jenney, Mundie and Jensen	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
44	Chicago Savings Bank Building (Chicago Building)	1-11 W Madison St/2-4 S State St	Office Building/Apartments	1905; Holabird and Roche 1997; (renovated as student housing for The School of The Art Institute of Chicago)	Chicago Style	Contributing Individually Listed (NRHP #75000645) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
45	Toys 'R Us	8-22 S State St	Specialty Store/Retail	1994; Lucien LaGrange and Associates	20th/21st Century Commercial	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
46	Majestic Building and Theater (Schubert Theater)	16-22 W Monroe St	Theater/Office Building	1905; Edmund R. Krause	Italian Renaissance	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
47	Kresge Building	26-28 S State St	Specialty Store/Retail	1925; Harold Holmes	Classical Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
48	McCrary Store	32-34 S State St	Specialty Store/Retail	1928-29; Leischenko and Esser	Art Deco	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
49	North American Building (Evans Furs)	36-42 S State St/2-10 W Monroe St	Tall Shop Building	1912; Holabird and Roche	Late Gothic Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
50	Schlesinger & Mayer Department Store (Carson, Pirie, Scott & Co. Department Store)	1-31 S State St/1-19 S Madison St	Department Store	1898-1903; Louis H. Sullivan (façades on Madison, northernmost seven bays on State, and corner rotunda) 1906; D. H. Burnham & Co. (five bays on State) 1980; Office of John Vinci (façade restoration)	Chicago Style/Sullivanese	Contributing National Historic Landmark (NRHP #70000231) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
51	Carson, Pirie, Scott & Co. Department Store Addition	33-37 S State St	Department Store	1961; Holabird and Root 1980; Office of John Vinci (façade restoration)	Chicago Style/Sullivanese, constructed to meld with the original façades designed by Louis Sullivan and D. H. Burnham & Co.	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
52	Mentor Building (County Seat)	39-41 S State St/2-6 E Monroe Blvd	Office Building	1906; Howard Van Doren Shaw	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
53	Monroe Garage (Carson, Pirie, Scott and Company Department Store)	10-12 E Monroe St	Department Store	1939; Louis Kroman, with Benjamin Shapiro as engineer 1948 (remodeled and integrated into Carson, Pirie, Scott and Company Department Store)	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
54	Heyworth Building	19-37 E Madison St/2-8 S Wabash Ave	Office Building	1904; D. H. Burnham and Company	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District






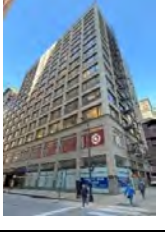
Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
55	Silversmith Building (Crown Plaza Hotel)	10-16 S Wabash Ave	Loft Building	1896; D. H. Burnham & Co., with Joachim Glaver as engineer	Romanesque	Contributing Individually Listed (NRHP #97000435)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
56	Haskell Building (Carson, Pirie, Scott and Company Department Store)	18-20 S Wabash Ave	Loft Building	1875; Wheelock and Thomas 1896; Louis H. Sullivan (1st and 2nd floor remodels)	Renaissance/Sullivan-esque	Contributing Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
57	Barker Building (Carson, Pirie, Scott and Company Department Store)	22-24 S Wabash Ave	Loft Building	1875; Wheelock and Thomas	Renaissance	Contributing Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
58	Atwater Building (Carson, Pirie, Scott and Company Department Store)	26-28 S Wabash Ave	Loft Building	1877; John Mills Van Osdel	Italianate	Contributing Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
59	Thomas Church Building (Carson, Pirie, Scott and Company Department Store)	30 S Wabash Ave	Loft Building	1903; Hill and Woltersdorf	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
60	Carson, Pirie, Scott and Company Men's Store	36-44 S Wabash Ave/16-34 E Monroe Blvd	Department Store	1926; Burnham Brothers	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
61	Mallers Building	1-7 S Wabash Ave/53-69 W Madison Ave	Office Building/Retail	1911; Christian A. Eckstorm	Commercial Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
62	Jewelers' Building (Iwan Ries & Company Building)	15-19 S Wabash Ave	Loft Building	1882; Adler & Sullivan	Sullivan-esque	Contributing Individually Listed (NRHP #74000752) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
63	Rae Building (Charette)	21-23 S Wabash Ave	Loft Building	1872; Frederick Baumann	Italianate	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
64	(Walgreens Drugstore)	25-27 S Wabash Ave	Loft Building	c. 1872 (original building) 1926; Doerr Brothers (new façade)	Classical Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
65	Crozen/Griffiths Building	29-35 S Wabash Ave	Loft Building	1879 (original building) 1915; Holabird and Roche (new façade and remodel)	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
66	Powers Building (Champlain Building)	37-43 S Wabash Ave/50-64 E Monroe Blvd	Loft Building	1901; Holabird and Roche	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
72	Amalgamated Bank of Chicago	100-108 S State St	Office/Bank Building	c. 1970	International, lower 2 stories greatly altered in 2016	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
73	Kitty Kelly Shoes	110-112 S State St	Specialty Store/Retail	1873 (original loft building) 1937; Alfred S. Alschuler (new front and interior)	2016 modern façade	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
74	Richman Brothers Building	114-116 S State St	Specialty Store/Retail	1928-29; Mundie and Jensen 1948 (exterior remodeling)	International, remodeled with metal panels and a grid of plate-glass windows prior to 2010	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
75	Singer Building	120 S State St	Office Building	1925; Mundie and Jensen	Late Gothic Revival	Contributing Individually Listed (NRHP #83000314)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
76	Palmer House	101-125 S State St/3-19 E Monroe St/112-132 S Wabash Ave	Hotel	1923; Holabird and Roche	Classical Revival	Contributing Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
77	Goodard Building	27-35 E Monroe St/100-104 S Wabash Ave	Office Building	1912; D. H. Burnham and Company, with Joachim G. Glaver as engineer	Commercial Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
78	Palmer House Addition	106-108 S Wabash Ave	Hotel Annex/Retail	1931; Holabird and Root	Classical Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
90	Waterman Building	127-129 S State St	Specialty Store/Retail	1920; Holabird and Roche	Chicago Style, currently being restored to original appearance with large upper-story windows and original terra cotta details	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
91	Edison Brothers Shoes (Baker's Shoes)	131-133 S State St	Specialty Store/Retail	pre-1916 1948; Holabird and Root (new façade)	International	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
92	Unicom Air-Conditioning Plant / Osco Drugs	135-143 S State St	Utility Building	1994; Eckenhoff Saunders Architects	Postmodern	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
93	(Russian Palace Restaurant, Wigfield)	18-26 E Adams St	Loft Building	c. 1872	Italianate	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
94	Hartman Building (Bennett Brothers)	30 E Adams St/134-146 S Wabash Ave	Specialty Store/Retail	1923; Alfreds Alschuler	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
105	Palmer Building (Berghoff's Restaurant)	25-27 W Adams St	Loft Building	1872; C. M. Palmer	Italianate	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
106	Stone Building (Berghoff's Restaurant)	15-23 W Adams St	Loft/Public Hall Building	1872	Italianate	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
107	Buck and Rayner Building (Century Building)	202-204 S State St	Tall Shop Building	1915; Holabird & Roche	Late Gothic Revival	Contributing		Alternative A: Adverse Effects Alternative B: Adverse Effects Alternative C: No Adverse Effects
108	John R. Thompson Company Building	208-212 S State St	Specialty Store/Retail	1920; Marshall & Fox c. 1995 (Facade remodeling)	c. 1995 stucco façade	Noncontributing Demolition underway		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
109	(Roberto's)	214 S State St	Loft Building/Retail	Unknown, possibly 1870s	c. 1960 upper façade clad with panels and c. 1930 storefront with recessed entrance and curved display windows trimmed with black Carrera glass and aluminum	Noncontributing (at time of NRHP listing) Appears to be intact behind modern slipcover. Considered to retain sufficient integrity and contribute to the district for the purposes of this undertaking.		Alternative A: Adverse Effects Alternative B: Adverse Effects Alternative C: No Adverse Effects
110	Consumers Building	220 S State St/1 North Quincy Court	Office Building	1913; Mundie and Jensen	Commercial	Contributing		Alternative A: Adverse Effects Alternative B: Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
111	Benson and Rixon Building	230 S State St	Specialty Store/Retail	1937; Alfreds Alschuler	Moderne	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
112	(Mr. Submarine)	14-18 W Jackson Blvd	Specialty Store/Retail	1882 (original 5-story commercial building) 1939 (remodeled as 2-story specialty store); Walter McDougall	21st Century Commercial (1939 Moderne-style façade may be intact on upper story)	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
113	Bond Store (United States Bureau of Immigration and Naturalization)	234-248 S State St/2-10 W Jackson St/ 11-19 W Quincy St	Specialty Store/Retail	1948; Friedman, Alschuler and Sincere, with Morris Lapidus as associate architect c. 1980s (glass curtain on State Street façade)	International-style glass curtain wall primary façade and preserved marble-clad secondary façade (Jackson Blvd)	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
114	Home Federal Savings and Loan Building (LaSalle Bank, Bank of America)	201-205 S State St	Office/Bank Building	1961; Skidmore, Owings & Merrill	International/Miesian	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
115	Woolworth Building	211-229 S State St	Specialty Store/Retail	1949; Shaw, Metz & Dolio	Moderne	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
116	(Sizes Unlimited)	231-233 S State St	Loft Building	1897 (2-story addition) 1950 (façade remodel)	c. 1970 metal façade	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
117	Lytton Building	235-243 S State St/2-14 E Jackson Blvd	Office Building/Retail	1911, Marshall and Fox	Commercial	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
118	Parking Garage	200 S Wabash Ave/25-35 E Adams St	Parking Garage/Retail	c. 1988	Utilitarian concrete structure with subdued Postmodern details	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
119	Hawley Building (Tower Records)	214 S Wabash Ave	Loft Building	1901; Frost and Granger	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
120	Ayer Building/McClurg Building (Pakula Building)	218-222 S Wabash Ave	Loft Building	1898; Holabird and Roche	Chicago Style	Contributing Individually Listed (NRHP #70000235)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
121	Atlas Building (Exchequer Restaurant and Pub)	226 S Wabash Ave	Loft Building	1928; Hall, Lawrence and Ratcliffe	Art Deco	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
122	Starck Building	228-230 S Wabash Ave	Loft Building	1925; Frank D. Chase	Classical Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District


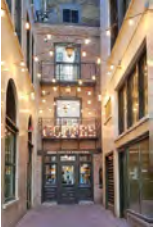




Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
123	Gibbons Building	18-20 E Jackson Blvd	Office Building	1912; Mashall and Fox	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
124	Col. Abson's Chop House	22 E Jackson Blvd	Restaurant	Unknown; possibly 1909	No style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
125	Ampico Building	234 S Wabash Ave	Loft Building	1927; Graven and Mayger	Art Deco	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
126	Steger Building	28 E Jackson Blvd; 230-232 S Wabash	Office/Specialty Store Building	1909; Mashall and Fox	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
129	Lyon and Healy Building (De Paul University)	243-249 S Wabash Ave/50-60 E Jackson Blvd	Office/Specialty Store Building	1916; Marshall and Fox	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
146	Maurice L. Rothschild Store (Walgreen Drugs; John Marshall Law School)	300-306 S State St/1-11 W Jackson Blvd	Specialty Store/Retail	1905; Holabird and Roche (original 8-story building) 1910; Holabird and Roche (8-story addition on State) 1930-31; Alfred S. Alschuler (added 4 stories to original building and an adjacent 12-story addition)	Chicago Style	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 2. Loop Retail Historic District






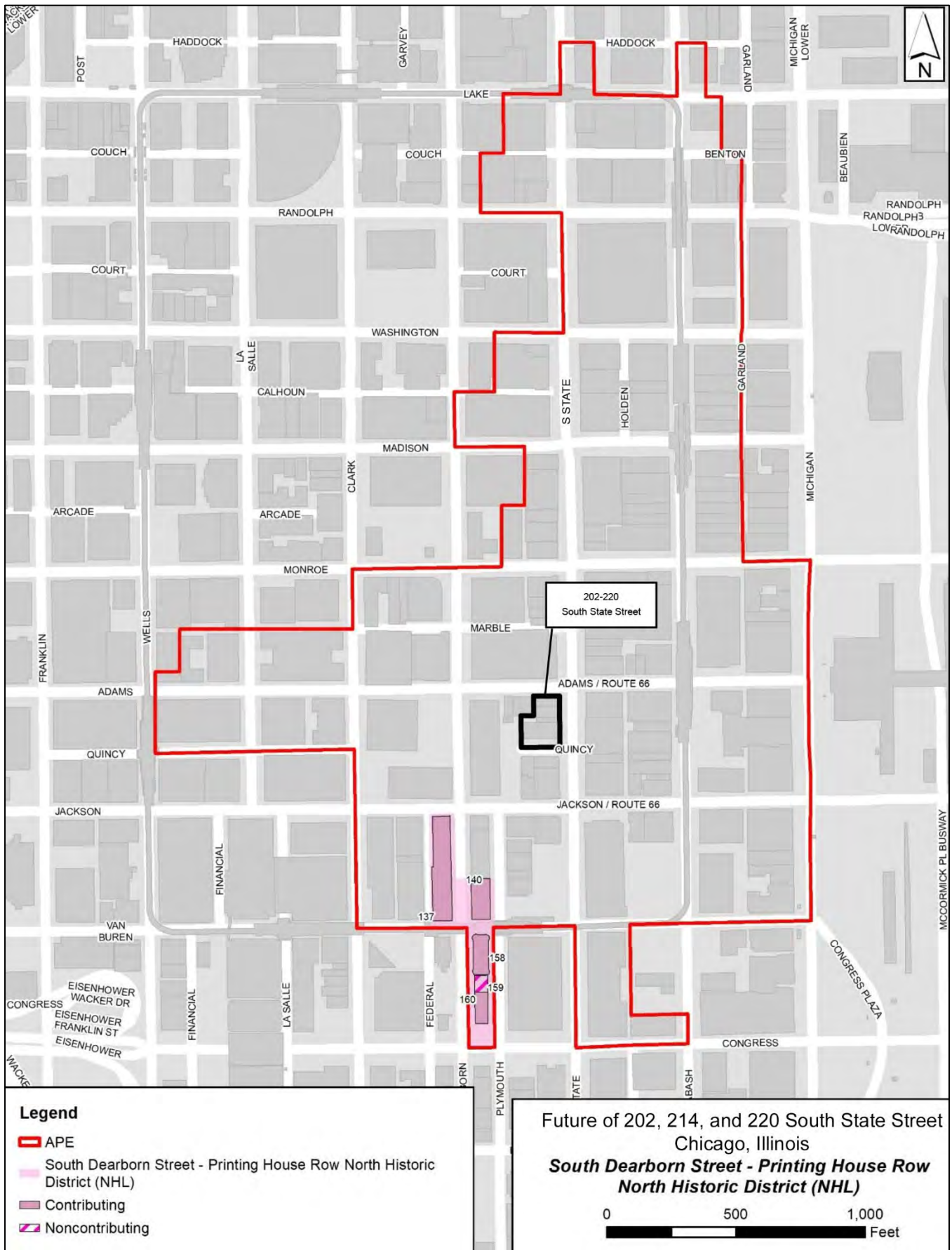
Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
147	A.M. Rothschild and Company Department Store (Goldblatt's Department Store, DePaul Center)	301-347 S State St/1 E Jackson	Department Store	1911, Holabird and Roche 1993; Daniel P. Coffey & Associates (renovation)	Chicago Style	Contributing Individually Listed (NRHP #89002025)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
149	Finchley Building (Comerfield J. O'Malley Place, DePaul University)	19-23 E Jackson Blvd	Office/Specialty Store Building	1927; Alfred A. Alschuler, with Lieberman & Hein as engineers	Tudor Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
150	Kimball Building (Franklin J. Lewis Center, DePaul University)	300-308 S Wabash Ave	Office/Specialty Store Building	1915; Graham, Burnham and Company	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
151	(Carl Fischer Music)	312-314 S Wabash Ave	Loft Building	1912	Chicago Style	Contributing (at time of NRHP listing) No longer extant (replaced c. 2000 by a parking lot)	---	Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
152	(Ira Barnett and Company)	316 S Wabash Ave	Loft Building	1890	Chicago Style	Contributing (at time of NRHP listing) No longer extant (replaced c. 2000 by a parking lot)	---	Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
161	Second Leiter Building (Sears, Roebuck & Co., Robert Morris College)	401-441 S State St/1-15 E Van Buren St/2-14 Ida B. Wells Pkw	Department Store	1889; William Le Baron Jenney	Chicago Style	Contributing National Historic Landmark (NRHP #76000695) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects






Table 2. Loop Retail Historic District

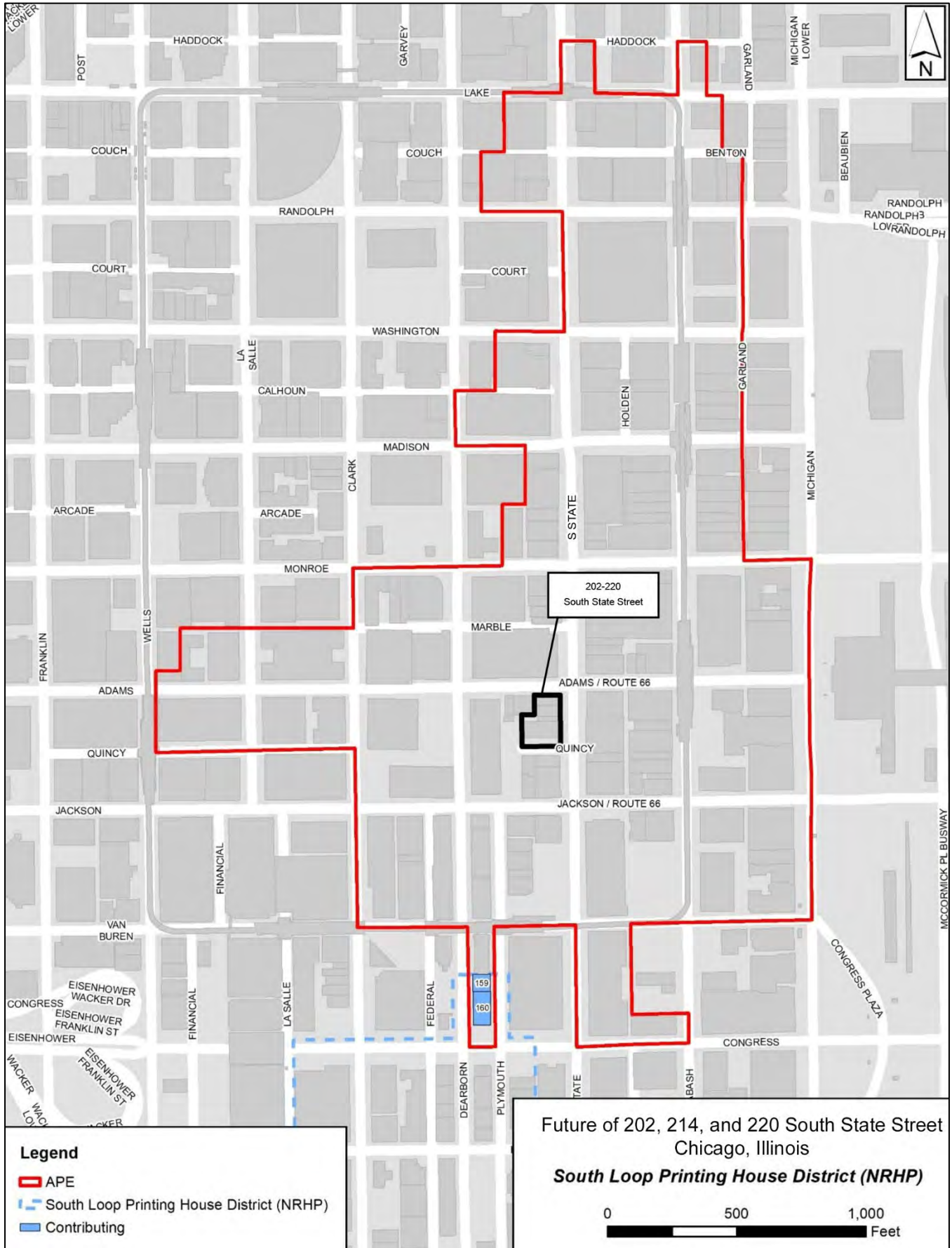
Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style	NRHP Eligibility	Photo	Preliminary Effects Assessment
162	George F. Kimball Building (24 East Congress Building, J. Ira and Nicki Harris Family Hostle)	434-438 S Wabash Ave/18-32 Ida B. Wells Pkw	Loft Building	1886; Treat and Foltz	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects



Map 3. South Dearborn Street – Printing House Row North Historic District



Table 3. South Dearborn Street-Printing House Row North Historic District

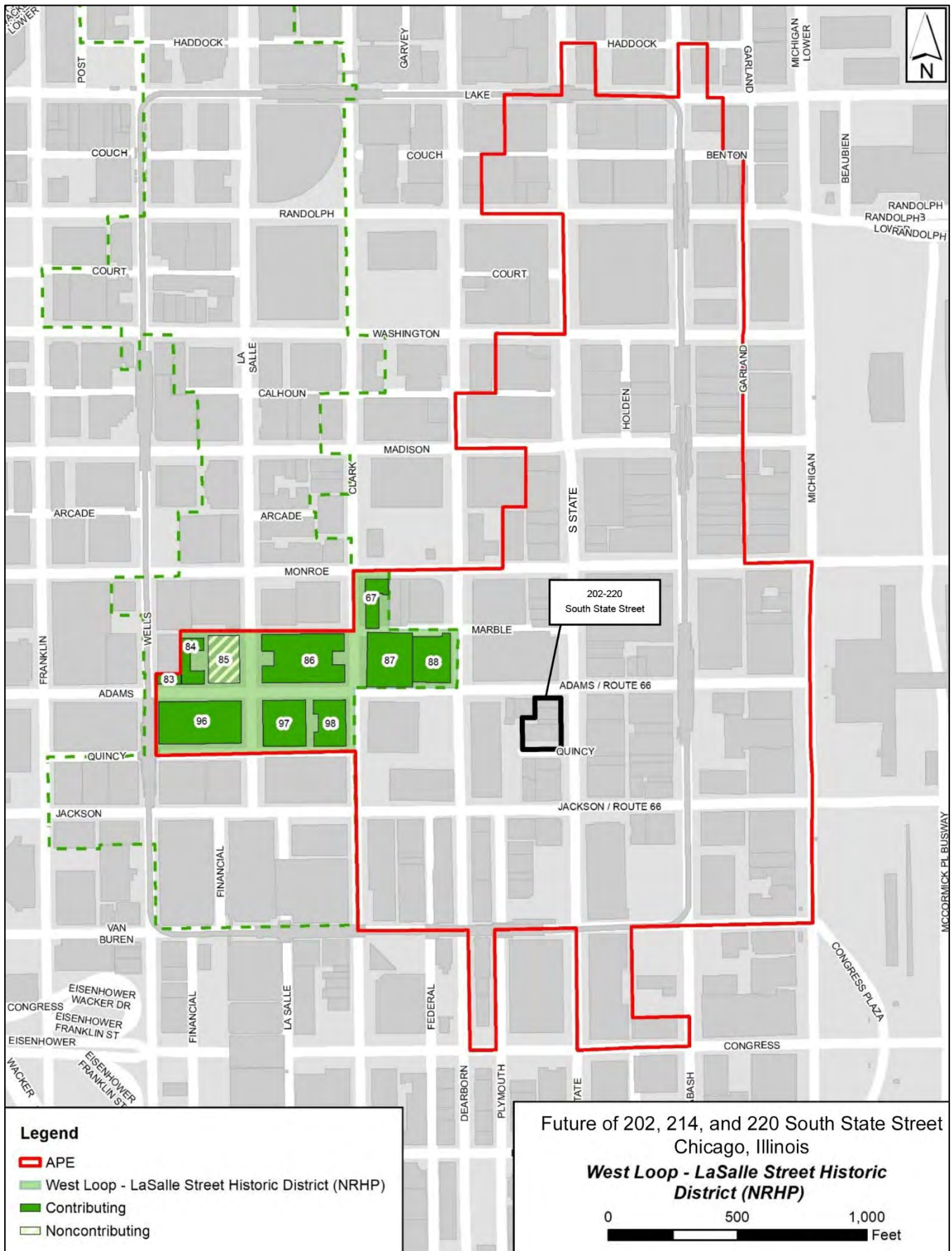
Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style/Details	NRHP Eligibility	Photo	Preliminary Effects Assessment
137	Monadnock Building	53 W Jackson Blvd	Office Building	1889-1891; Burnham & Root, north section of building 1893; Holabird & Roche, south section of building	Chicago School	Contributing Individually Listed (NRHP #7000236) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
140	Fisher Building	343 S Dearborn St	Office Building	1896; Daniel Burnham and engineer E. C. Shankland	Chicago School	Contributing Individually Listed (NRHP #76000691) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
158	Old Colony Building	407 S Dearborn St	Office Building	1893-1894; Holabird & Roche and engineer Corydon T. Purdy	Chicago School	Contributing Individually Listed (NRHP #76000701) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
159	Plymouth Building	417 S Dearborn St	Office Building/Correspondence School	1899; Simeon B. Eisendrath 1945; W. Scott Armstrong, exterior remodel	Collegiate Gothic	Noncontributing Chicago Landmark Contributing to South Loop Printing House District (see Table 4)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
160	Manhattan Building	431 S Dearborn St	Industrial/Office Building (Publishing and Printing)	1889-1891; William LeBaron Jenny and engineer Louis E. Ritter	Chicago School	Contributing Individually Listed (NRHP #76000697) Chicago Landmark Contributing to South Loop Printing House District (see Table 4)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects



Map 4. South Loop Printing House District

Table 4. South Loop Printing House District (Only Properties in APE)

Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style/Details	NRHP Eligibility	Photo	Preliminary Effects Assessment
159	Plymouth Building	417 S Dearborn St	Office Building/Correspondence School	1899; Simeon B. Eisendrath 1945; W. Scott Armstrong, exterior remodel	Collegiate Gothic	Contributing Chicago Landmark Noncontributing to South Dearborn Street-Printing House Row North Historic District (see Table 3)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
160	Manhattan Building	431 S Dearborn St	Industrial/Office Building (Publishing and Printing)	1889-1891; William LeBaron Jenny and engineer Louis E. Ritter	Chicago School	Contributing Individually Listed (NRHP #76000697) Chicago Landmark Contributing to South Dearborn Street-Printing House Row North Historic District (see Table 3)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects



Map 5. West Loop – LaSalle Street Historic District

Table 5. West Loop-LaSalle Street Historic District (Only Properties in APE)











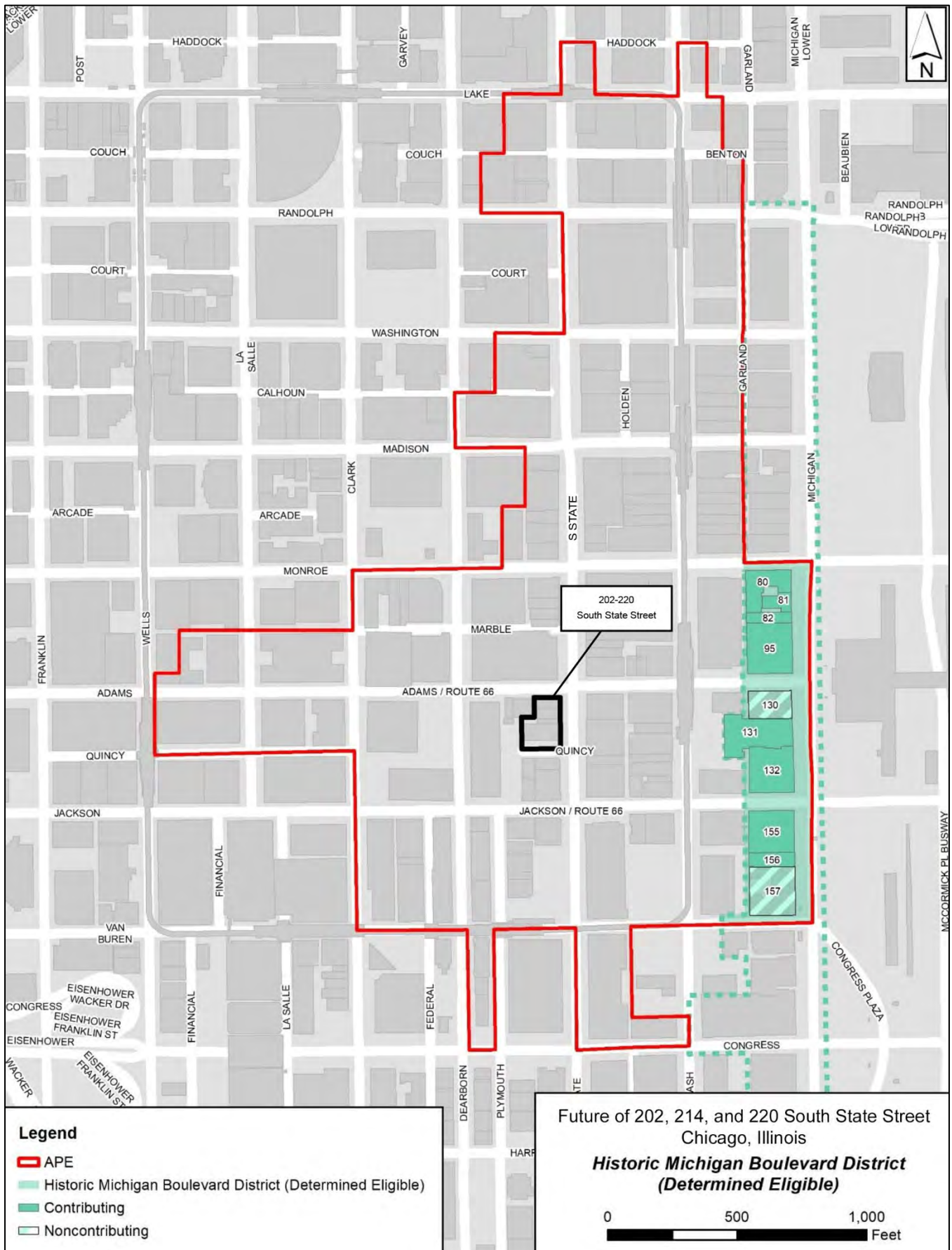
Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style/Details	NRHP Eligibility	Photo	Preliminary Effects Assessment
67	Rector Building (Chicago Trust Building; Bell Savings Building)	79 W Monroe St	Office/Bank Building	1905; Jarvis Hunt c. 1921; 13th floor addition 1924; Holabird & Roche (south addition)	Beaux Arts	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
83	Textile Building	180 W Adams St	Loft/Commercial Building	1912; Samuel N. Crowen	Commercial	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
84	Midland Building (W Chicago City Center)	172 W Adams St	Office/Club Building	1927; Karl M. Vitzthum & Co.	Italian Renaissance Revival	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
85	USBank	190 S LaSalle St	Office Building	1987; Johnson/Burgee Architects with Alfred Shaw & Associates, associate architects	Postmodern	Noncontributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
86	Field Building (Bank of America)	135 S LaSalle St	Office Building	1928-1934; Graham, Anderson, Probst & White (Alfred P. Shaw, designer)	Art Deco	Contributing Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
87	Edison Building (Commercial National Bank Building)	125 S Clark St/72 W Adams St	Office/Bank Building	1907; D. H. Burnham & Co.	Classical Revival	Contributing Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 5. West Loop-LaSalle Street Historic District (Only Properties in APE)

Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style/Details	NRHP Eligibility	Photo	Preliminary Effects Assessment
88	Marquette Building	140 S Dearborn St	Office Building	1895; Holabird & Roche 1905; Holabird & Roche (1-bay addition)	Chicago School	Contributing National Historic Landmark (NRHP #73000697) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
96	Continental and Commercial National Bank Building	208 S La Salle St	Office/Bank Building	1914; D. H. Burnham & Co.; Graham, Anderson, Probst & White	Classical Revival	Contributing Individually Listed (NRHP #07000064) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
97	Rookery Building	209 S La Salle St	Office Building	1885-1888; Burnham & Root 1905-07; Frank Lloyd Wright (lobby and light court renovations) 1931; William Drummond (lobby renovation) 1992; Hasbrouck-Hunderman (building restoration)	Chicago School/Romanesque Revival	Contributing National Historic Landmark (NRHP #70000238) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
98	Bankers Building	105 W Adams St/200 S Clark	Office Building	1927; Burnham Brothers	Art Deco	Contributing		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects



Map 6. Historic Michigan Boulevard District

Table 6. Historic Michigan Boulevard District (Only Properties in APE)











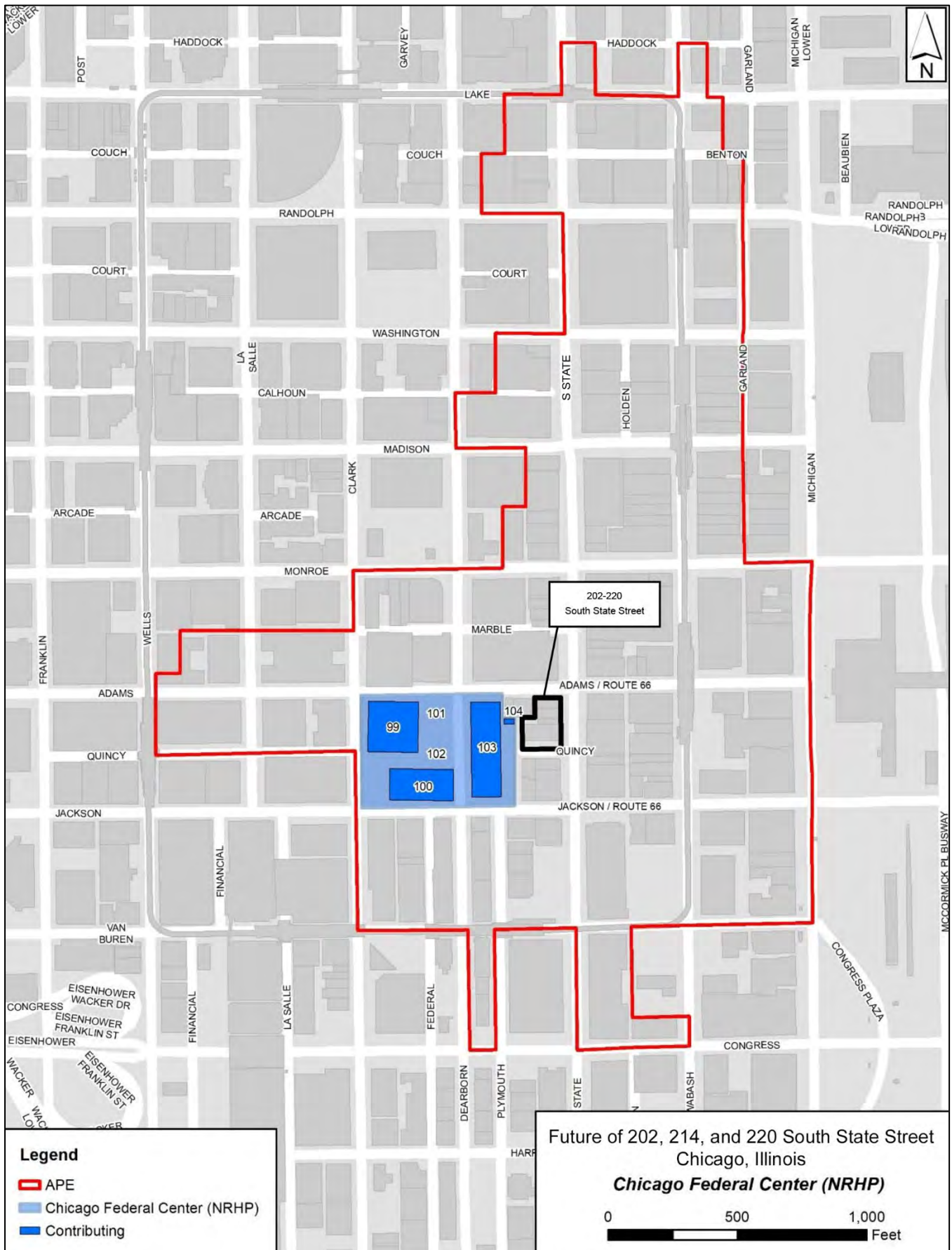
Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style/Details	NRHP Eligibility**	Photo	Preliminary Effects Assessment
80	Monroe Building	104 S Michigan Ave	Office Building	1912; Holabird & Roche	Gothic/Romanesque Revival	Considered contributing for the purposes of this undertaking		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
81	Illinois Athletic Club	112 S Michigan Ave	Social Club/Educational Facility	1908; Barnett, Haynes & Barnett	Renaissance Revival	Considered contributing for the purposes of this undertaking		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
82	Lakeview Building (Municipal Courts Building)	116 S Michigan Ave	Office Building	1906; Jenney, Mundie & Jensen 1912; Jenney, Mundie & Jensen-5 upper stories added	Chicago School/Commercial	Considered contributing for the purposes of this undertaking Individually Listed (NRHP #85001912)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
95	People's Gas, Light, and Coke Building	122-150 S Michigan Ave	Commercial/Office Building	1911; Burnham & Co.	Chicago School/Neo-Classical	Considered contributing for the purposes of this undertaking Individually Listed (NRHP #84000293)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
130	200 South Michigan Avenue	200 S Michigan Ave	Office Building	1958; A. Epstein and Sons International, Inc. and George A. Fuller Company	International	Considered noncontributing for the purposes of this undertaking (construction date outside the district's period of significance)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
131	Orchestra Hall (Theodore Thomas Orchestra Hall)	220 S Michigan Ave	Theater	1900s; Burnham & Co.	Georgian/Classical Revival	Considered contributing for the purposes of this undertaking National Historic Landmark (NRHP #78001127)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 6. Historic Michigan Boulevard District (Only Properties in APE)







Map Ref#	Property Name	Location/Address	Building Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style/Details	NRHP Eligibility**	Photo	Preliminary Effects Assessment
132	Railway Exchange Building (Santa Fe Building)	222-238 S Michigan Ave	Commercial/Office Building and Museum	1904; Burnham & Co.	Chicago School	Considered contributing for the purposes of this undertaking Individually Listed (NRHP #82002530)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
155	Straus Building (Continental Center, Metropolitan Tower)	310 S Michigan	Office Building	1924; Graham, Anderson, Probst, & White	Classical	Considered contributing for the purposes of this undertaking		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
156	Richelieu Hotel	318 S Michigan Ave	Office Building	1885; Slinger	Italianate	Considered contributing for the purposes of this undertaking		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
157	McCormick Building	330 S Michigan Ave	Commercial/Office Building	1912; Holabird & Roche	Commercial	Considered noncontributing for the purposes of this undertaking (appears to lack sufficient integrity)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

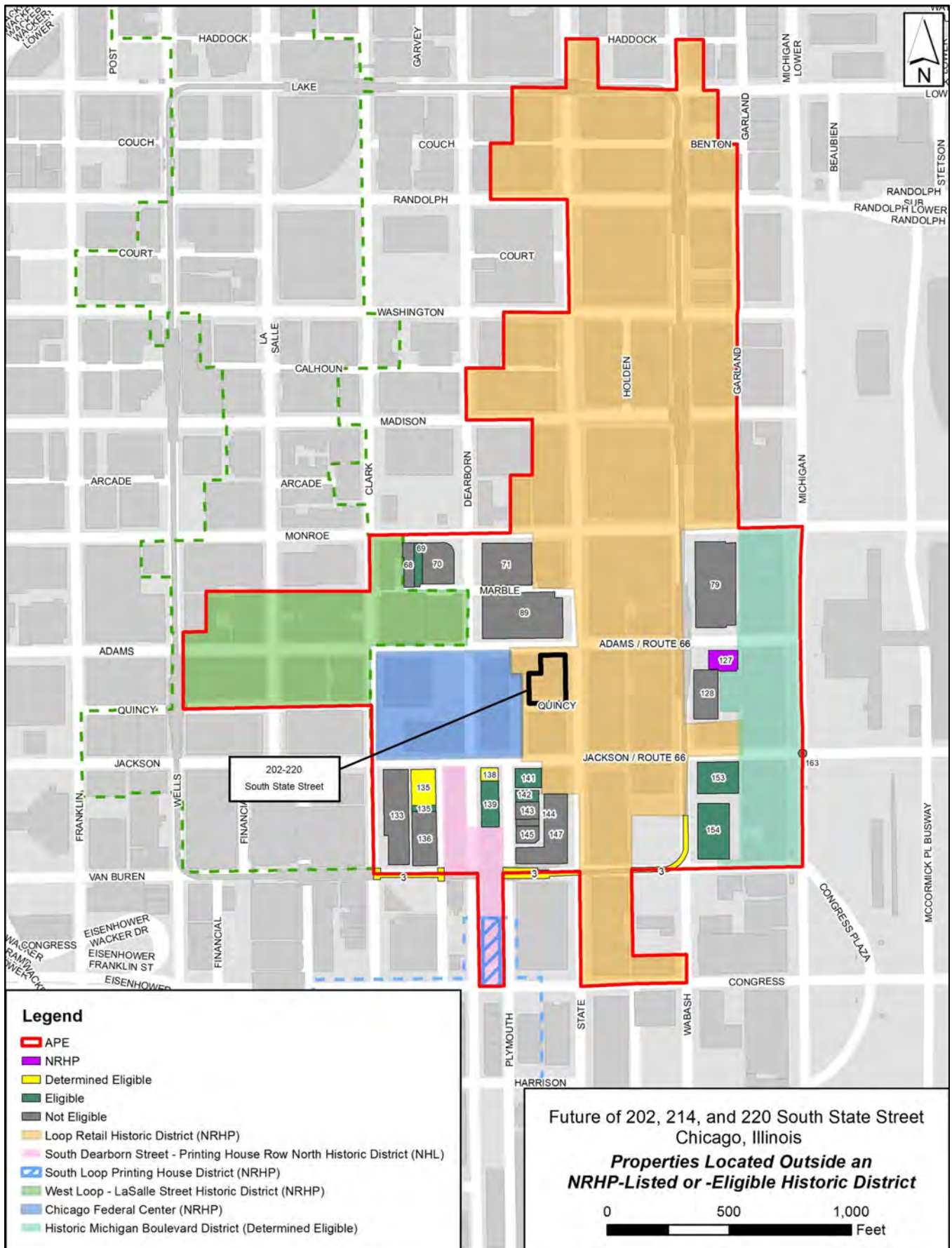
**Contributing and noncontributing resources were not differentiated when the district was determined eligible



Map 7. Chicago Federal Center

Table 7. Chicago Federal Center

Map Ref#	Property Name	Location/Address	Resource Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style/Details	NRHP Eligibility	Photo	Preliminary Effects Assessment
99	U.S. Post Office Loop Station	211 S Clark St	Federal Post Office	Designed 1965, constructed 1970-1973; Mies van der Rohe, in association with C.F. Murphy and Associates, A. Epstein and Sons, and Schmidt, Garden and Erikson	Miesian/International	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
100	John C. Kluczynski Federal Building	230 S Dearborn St	Office Building	Designed 1965, constructed 1970-1974; Mies van der Rohe, in association with C.F. Murphy and Associates, A. Epstein and Sons, and Schmidt, Garden and Erikson	Miesian/International	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
101	Plaza	Chicago Federal Center	Public Outdoor Space	Designed 1965, constructed 1970-1974; Mies van der Rohe, in association with C.F. Murphy and Associates, A. Epstein and Sons, and Schmidt, Garden and Erikson	Large plaza paved with Rockville granite that surrounds each structure at the center	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
102	Flamingo	Chicago Federal Center	Sculpture	1974; Alexander Calder	Stylized Sculpture	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
103	Everett M. Dirksen Federal Courthouse	219 S Dearborn St	Federal Courthouse/Office Building	Designed and constructed 1959-1964; Mies van der Rohe, in association with C.F. Murphy and Associates, A. Epstein and Sons, and Schmidt, Garden and Erikson	Miesian/International	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
104	Mechanical Building	Chicago Federal Center	Utilities	Designed and constructed 1959-1964; Mies van der Rohe, in association with C.F. Murphy and Associates, A. Epstein and Sons, and Schmidt, Garden and Erikson	Miesian/International	Contributing		Alternative A: Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects



Map 8. Properties in the APE and Outside Historic Districts

Table 8. Historic Properties in APE but Outside Historic Districts















Map Ref#	Property Name	Location/Address	Resource Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style/Details	NRHP Eligibility	Photo	Preliminary Effects Assessment
3	Chicago Union Loop Elevated Structure and Stations	Lake St, Wabash Ave, Van Buren St, and Wells St	Elevated Rail Structure and Stations	1897; John Alexander Low Waddell (elevated structure), A. M. Hedley (original stations)	Classical Revival (original stations) There are no extant original stations within the APE	Determined Eligible (SHPO Reference #137218)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
69	Italian Village Restaurant	71 W Monroe St	Commercial/Restaurant	1908; façade likely dates to 1927 when restaurant opened	Stylized Italian/Mediterranean	Individually eligible under Criterion C as a distinctive example of the Italian/Mediterranean style applied to a storefront and commercial façade		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
70	Xerox Center (55 West Monroe)	55 W Monroe St; 100 S Dearborn St	Office Building	1977-1980; Helmut Jahn	Postmodern	Post Modern office tower designed by noted Chicago architect Helmut Jahn and constructed 1977 to 1980. Although it is not yet 50 years old, GSA is considering it eligible under Criterion C for purposes of this undertaking as it will likely meet the 50 year threshold by the time the undertaking is completed.		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
71	Skidmore, Owings, Merrill Building	33 W Monroe St; 111 S Dearborn St	Office Building	1980, Skidmore, Owings & Merrill	Postmodern	Post Modern office tower constructed in 1980. It was designed by the Chicago architectural firm of the same name to serve as its headquarters. Although it is not yet 50 years old, GSA is considering it eligible under Criterion C for purposes of this undertaking as it will likely meet the 50 year threshold by the time the undertaking is completed.		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
79	Mid-Continental Plaza	55 E Monroe St	Office Building	1972; Shaw and Associates	Postmodern	Individually eligible under Criterion C as a distinctive example of Postmodern high-rise architecture in Chicago and the work of architectural firm Shaw and Associates		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
127	Chapin and Gore Building	63 E Adams St	Retail/Commercial Building	1905	Gothic-inspired	Individually Listed (NRHP #79000823) Chicago Landmark		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
134	Union League Club of Chicago	65-67 W Jackson Blvd	Club Building	1926	Italian Renaissance/Classical Revival	Determined Eligible (SHPO Reference #137049)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

Table 8. Historic Properties in APE but Outside Historic Districts

Map Ref#	Property Name	Location/Address	Resource Type/Use	Date(s) of Construction and Architect (if known)	Architectural Style/Details	NRHP Eligibility	Photo	Preliminary Effects Assessment
135	Chicago Engineers Club	314 S Federal St	Club Building	1912	Gothic Revival	Individually eligible under Criterion C as a distinctive example of Gothic Revival architecture within the context of the Loop Noted in CHRS as potentially significant in the context of the surrounding community (Orange)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
138	33 W. Jackson Boulevard	27-33 W Jackson Blvd	Retail/Commercial Building	1919	Chicago School/Commercial	Determined Eligible (SHPO Reference #137047)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
139	Standard Club	306-332 S Plymouth Ct	Club Building	1926; Albert Kahn	Italian Renaissance/Classical Revival	Individually eligible under Criterion A for its association with the Standard Club social organization and Criterion C as a distinctive example of Italian Renaissance/Classical Revival architecture and the work of architect Albert Kahn Noted in CHRS as potentially significant in the context of the surrounding community (Orange)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
141	Sears Building (John Marshall Law School)	17-23 W Jackson Blvd	Office/Education	1903	Chicago School	Individually eligible under Criterion C as a representative example of the Chicago School applied to a commercial vernacular building Noted in CHRS as potentially significant in the context of the surrounding community (Orange)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
142	City Club (John Marshall Law School)	315 S Plymouth Ct	Club/Education Building	1903	Late Gothic Revival	Individually eligible under Criterion C as a distinctive example of its Late Gothic Revival architecture within the context of the Loop Noted in CHRS as potentially significant in the context of the surrounding community (Orange)		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
153	Continental Center II	55 E Jackson Blvd	Office Building	1962; C.F. Murphy Associates with Jacques Brownson and James Ferris as co-designers	International	Chicago Landmark Individually eligible under Criterion C as a distinctive example of the International Style in Chicago and the work of architects C. F. Murphy Associates		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects
154	333 South Wasbash, "Big Red", formerly CNA Center, Continental Center III	325-333 S Wabash Ave/60 E Van Buren St	Office Building	1972; Graham, Anderson, Probst & White	International	Individually eligible under Criterion C as a distinctive example of the International Style in Chicago and the work of architecture firm Graham, Anderson, Probst & White		Alternative A: No Adverse Effects Alternative B: No Adverse Effects Alternative C: No Adverse Effects

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2 **Appendix C**
3 **Management Procedures Memorandum**
4 **No. 2015-01**

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EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

March 25, 2015

THE CONTROLLER

MANAGEMENT PROCEDURES MEMORANDUM NO. 2015-01

MEMORANDUM FOR: ALL CFO ACT EXECUTIVE AGENCIES

FROM: David Mader 
Controller

SUBJECT: Implementation of OMB Memorandum M-12-12 Section 3:
Reduce the Footprint

OMB CONTACTS: William Hamele (202-395-7583, whamele@omb.eop.gov) and
Stannis Smith (202-395-7764, ssmith@omb.eop.gov)

Summary:

Consistent with Section 3 of the Office of Management (OMB) and Budget Memorandum M-12-12, *Promoting Efficient Spending to Support Agency Operations* (May 11, 2012), all Chief Financial Officers (CFO) Act Executive Branch departments and agencies shall move aggressively to dispose of surplus properties held by the Federal Government, make more efficient use of the Government's real property assets, and reduce the total square footage of their domestic office and warehouse inventory relative to an established baseline. This Memorandum supersedes OMB Management Procedures Memorandum 2013-02 (March 14, 2013) and clarifies existing policy to dispose of excess properties and promote more efficient use of real property assets.

OMB and the General Services Administration (GSA) will annually monitor the continuing implementation of this policy. As part of this process, each agency will develop and submit a Real Property Efficiency Plan in lieu of a Revised Real Property Cost Savings and Innovation Plan. GSA will support policy implementation through data management and analytics to identify real property efficiency opportunities.

I. Actions Required:

1. Real Property Efficiency Plan

Each agency shall develop and submit to GSA and OMB a draft final 5-year Real Property Efficiency Plan (Plan) by July 10, 2015, and submit a final plan signed by the Agency's Deputy Secretary or Administrator by September 10, 2015. Each year thereafter, agencies shall submit a draft final Plan ninety (90) days after the final Federal Real Property Profile (FRPP) data submission. The final Plan, signed by the Agency's Deputy Secretary or Administrator, shall be submitted sixty (60) days after an agency's annual Strategic Review meeting with OMB. The first plan will cover Fiscal Years (FY) 2016 – FY2020, the second plan will cover FY2017 – FY2021, and so forth for five fiscal

years. The Plan will describe the agency's overall strategic and tactical approach in managing its real property, provide a rationale for and justify its optimum portfolio, and drive the identification and execution of real property disposal, efficiency improvements, general usage, and cost saving measures. The narrative section of the Plan should not exceed twenty (20) pages and will meet the requirements set forth in the Implementation Section of this Memorandum.

2. Space Design Standard for Office Space.

No later than one year after the date of this Memorandum, agencies shall issue a policy that specifies a design standard for maximum useable square feet by workstation for use in the design of owned and leased domestic office space, including GSA occupancy agreements, that it occupies. The policy shall apply, at a minimum, to all space renovations and new acquisitions for all agency components. Agency components may implement different standards based upon mission requirements, provided the Agency documents and justifies the applicable standard within its policy. Agencies are not required to retrofit existing space to meet the standard specified by their policy. Agencies also are not required to apply the standard to replacement, succeeding or superseding leases, executed by the agency or by GSA, if the agency can demonstrate that application of the standard is not cost effective.

- a. ***Elements of the Office Space Design Standard.*** In determining the office space standard, each agency shall consider core mission requirements associated with providing an appropriate work space for employees. Those core requirements include, but are not limited to: (1) agency mission; (2) job functions performed in the space; and (3) equipment necessary to perform the job.

3. Reduction Targets for Office and Warehouse Space.

Agencies shall specify in their Plan reduction targets for their portfolio of domestic office and warehouse space on an annual basis. Separate targets for offices and warehouses shall be specified for FY2016 through FY2020. Targets must be reported as annual net square foot reductions to office and warehouse space. Changes to mission requirements and availability of budgetary resources may require modifications to targets, particularly in the out-years.

- a. ***Measurement of Reductions.*** Reductions to office and warehouse space will be calculated annually using both GSA Occupancy Agreement data and FRPP data. To calculate reductions in office and warehouse space, the office and warehouse square footage reported by these data sources at the end of the target year (e.g., FY2017) will be compared to the office and warehouse square footage reported by these data sources in the previous year (i.e., FY 2016).
- b. ***Application of Warehouse Targets.*** Agencies that have fewer than two hundred (200) domestic warehouses in their portfolio are not required to set warehouse reduction targets. The total number of agency warehouses is determined by adding

the number of GSA warehouse Occupancy Agreement locations to the number of warehouses reported in the FRPP for which the agency is listed as the using organization.

4. Reduction Targets to Dispose of Owned Buildings.

In addition to the office and warehouse targets specified above, agencies shall specify in the Plan annual reduction targets for domestic owned building properties reported in the FRPP. Targets shall include all buildings with the exception of owned offices or warehouses (tracked separately) and shall be specified for FY2016 through FY2020. Targets must be reported as the number of individual buildings and square feet slated for disposal.

- a. ***Measurement of Reductions.*** Agency disposals will be calculated annually using FRPP data. Only owned building properties that have an FRPP disposition method of public benefit conveyance, Federal transfer, sale or demolition will be credited toward agencies' annual disposal targets. Disposal of office and warehouse space are not credits to this target as they are credited in 3 ("Reduction Targets for Office and Warehouse Space") above. Agencies must remove a property from their real property inventory or submit a report of excess to GSA in order to be credited with disposing of the property.

5. Freeze the Footprint.

An agency shall not increase the square footage of its domestic inventory of office and warehouse space. In general, while progress in meeting the Freeze the Footprint requirement will be based on an annual evaluation of an agency's total office and warehouse square footage compared to its baseline, there may be circumstances where an agency experiences mission changes leading it to exceed its square-footage baseline in a given year. The agency is nevertheless in compliance with this requirement based on the timing of already-identified offsets relative to its square-footage baseline.

- a. ***Baseline for Measurement.*** An agency's total square footage for office and warehouse space shall remain at its FY2012 baseline through FY2015. Agency baselines will be recalculated based on the FY2015 FRPP data and FY2015 GSA Occupancy Agreement data. GSA will consolidate this information and submit it to each agency for review. Within thirty (30) business days of receipt, each agency may provide comments and additional information to GSA for consideration. This new baseline shall remain in effect through FY2020.

- b. ***Requirements for Offsets.***¹

- i. On an annual basis, an agency must identify in its Plan offsets for any growth

¹ GSA is subject to the offset requirement for space that it uses for its own agency operations. The offset requirement does not apply to GSA for space that GSA maintains, leases, or otherwise obtains for the operations of other Federal agencies.

in total office and warehouse space with other corresponding reductions in total office or warehouse space to ensure that there is no net increase in the size of its owned and leased inventory of office and warehouse space, compared against its baseline.

- ii. A disposal creates an offset in the amount of the square footage of the office or warehouse space disposed. Within an agency's own inventory of owned and leased office or warehouse space, a consolidation can yield subsequent disposals that create offsets. The agency's declaration of a property as excess to GSA will count as an offset. Additionally, office and warehouse properties located at military installations that are closed or realigned as part of a Defense Base Realignment and Closure (BRAC) process may be counted as an offset. For GSA space leased on behalf of another agency, that agency's disposal of the space is recognized as occurring on the agency rent termination date.
- iii. An agency may not use the following as an offset:
 - a) Properties that the agency has "mothballed" (*i.e.*, property is temporarily not occupied or utilized);
 - b) Enhanced use leases (EULs) and outleases; or
 - c) Properties that have their predominant use code in the FRPP changed to a code other than "office" or "warehouse" after the baseline has been finalized.

II. Implementation:

1. Contents of the Real Property Efficiency Plan

Agencies' Plans shall contain the following information:

- a. ***Description of Internal Controls.*** Each agency shall describe the methods and procedures for complying with the requirements of this Memorandum. These controls may include, but are not limited to:
 - i. The processes through which the agency will identify and execute offsets when acquiring additional office and warehouse space;
 - ii. Internal reviews and certification processes, specifically the level of management review and approval required for new leases, acquisitions, expansions or other growth in the agency's office and warehouse space before they are implemented;
 - iii. Documentation to justify each instance in which the standard design requirement is not applied because it is not cost effective.

- iv. Tracking of all agency domestic office and warehouse increases and offsets; and
 - v. Process for identifying and prioritizing reductions to office and warehouse space and disposal of properties based upon return on investment and mission requirements.
- b. *Use of Performance Benchmarks.*** Each agency shall describe how it uses the President's Management Agenda performance benchmarks to prioritize the funding of consolidation and disposal projects. Other relevant factors employed in the prioritization process, such as mission delivery requirements, among others, shall be described.
- c. *Reduction Targets for Offices and Warehouse Space.*** Each agency shall report reduction targets as described in 3 above in tabular format by year. The actual square foot reduction achieved and the cost data described in section II.1 (f) (i) shall also be reported in the table.
- d. *Disposal Targets for Owned Buildings.*** Each agency shall report reduction targets as described in section I.4 above in tabular format by year. The actual number of disposed assets, square foot reduction, and the cost data described in section II.1 (f) (ii) shall be reported in the table.
- e. *Plan to Identify Reductions to Office and Warehouse Space to Reduce or Maintain the Freeze the Footprint Baseline.*** The objective of the Plan is to assist agency efforts to systematically develop real property project data to identify efficiency opportunities for consideration in future budget years. Each agency shall include:
- i. A spreadsheet that identifies potential agency office and warehouse acquisitions, consolidations, co-locations, disposals, and construction projects as acquisitions or offsets anticipated over the first three years of the five year planning period. The last two years of the five-year planning period can be summarized as portfolio-wide square footage changes to office and warehouse space. The spreadsheet shall include the following column headers and appropriate data: FRPP Real Property Unique Identifier;² Office or Warehouse; Size; Legal Interest; City; State; Zip Code; and Estimated Date the Asset will Leave the Inventory or Estimated Date the Agency will Begin Occupation of New Space;
 - ii. A narrative description of the strategies and policies an agency will utilize to carry out mission and program priorities while staying at or reducing its baseline, identifying and implementing offices and warehouse reductions, and identifying and disposing of owned property;
 - iii. A narrative description to the individual project level of the planning process the

² For GSA assignments, each agency shall include the Occupancy Agreement number.

agency will use to leverage data and portfolio requirements for developing recommendations for future budget years;

- iv. At least three project examples of planned reductions to office and warehouse space through consolidation, co-locations, and disposals that can be updated and tracked publicly; and
 - v. A brief narrative, which can be updated and tracked publicly, describing successful strategies, specific challenges, and explanation for the result achieved in the annual Freeze the Footprint baseline compliance assessment.
- f. *Documentation of Costs.*** Each agency shall include:
- i. At the asset level, for projects completed in the previous fiscal year (FY15 excluded), the total investment cost and total cost reduction generated through disposal of owned and leased office and warehouse space 2,500 square feet or greater, for one- and cumulative seven-year time periods, per guidance provided by GSA;
 - ii. At the program level, for projects completed the previous fiscal year (FY15 excluded), the total investment cost and total cost reduction generated through disposal of all owned buildings, excluding office and warehouse space, for one- and cumulative seven-year time periods, per guidance provided by GSA; and
 - iii. A general description of how the agency will implement the records retention requirement for cost documentation in Section II.3 below.

g. *Explanation of Efficiency.* Each agency shall include:

- i. An analysis and discussion of what actions the agency is taking to maximize and increase efficiency in its office space; and
- ii. Cost effective alternatives to acquisition of additional office space, such as consolidation, co-location, teleworking, and “hoteling.”

2. Certification of FRPP Data.

a. *FRPP Data Submittal.* Each agency shall:

- i. Submit to GSA a certification letter signed by the agency CFO that characterizes the accuracy of the data being submitted to the FRPP system and the methodology used to evaluate the accuracy of the data. The letter must be provided to GSA by December 31 of each year; and
- ii. Describe efforts currently employed or planned as part of the agency’s independent verification and validation process to improve the accuracy and

completeness of FRPP data.

3. Records Retention.

Each agency shall retain records that document the calculations completed to implement the above reporting requirements in Section II.1 (f) (i) and Section II.1 (f) (ii). A spreadsheet summary, by individual reduction and disposal project, shall be retained and updated annually. These records shall be made available to GSA as needed to support its monitoring and reporting responsibilities in Section II.4 (b) and Section II.4(c). Records shall be maintained until the expiration of this policy.

4. Government-Wide Controls.

GSA and OMB will take the following actions to improve the consistency and accuracy of information used to measure agency performance:

- a. **GSA Monitoring Methods.** No later than thirty (30) days following the release of this Memorandum, GSA will provide the draft monitoring and reporting methods and the draft templates agencies will use to report on the requirements of this Memorandum, to the agencies for review and comment. Agencies will have fifteen (15) days to provide comment and GSA will finalize the methods and templates twenty (20) days after the fifteen (15) day comment period closes.
- b. **GSA Monitoring.** Within sixty (60) days of agencies submitting their final FRPP data, GSA will analyze the data submissions and agency Occupancy Agreement data maintained by GSA to measure compliance with this policy. GSA will define and perform data integrity tests on agency-submitted FRPP and Occupancy Agreement data that will help ensure the information is valid and reliable.
- c. **GSA Reporting.** Within sixty (60) days of agencies submitting their final FRPP data, GSA will transmit a report to OMB that provides each agency's: (i) office and warehouse square footage, reduction from the previous reporting year, and an assessment of whether agency targets have been met; (ii) the number of buildings disposed, including total square footage, and an assessment of whether corresponding agency targets have been met; (iii) the office and warehouse square footage compared to the Freeze the Footprint baseline; and (iv) an assessment of the adequacy of agency compliance with Section II.1(f)(i) through Section II.1(f)(ii) of this Memorandum based on its most recent report.
- d. **OMB Review.** OMB will review each agency's Plan prior to the spring meeting between the OMB and the agency.

5. Transparency.

On an annual, calendar year basis, and after consultation with GSA and the agencies, OMB will update Performance.gov with information on each agency's office and

warehouse reduction targets and annual reduction achieved, disposal targets and actual disposal achieved, and total office and warehouse square footage relative to each agency's baseline.

Glossary of Terms.

Co-location. For the purposes of this Memorandum, a co-location is the merging of two or more components, offices, bureaus or divisions from two or more agencies, where one agency consolidates its components, offices, bureaus or divisions into the host agency's space.

Consolidation. For the purposes of this Memorandum, a consolidation is combining one or more components, offices, bureaus or divisions, of the same agency in an existing owned office or warehouse space, and disposing of the square footage in a leased facility.

Enhanced use leases (EULs) and outleases. For the purposes of this Memorandum, enhanced use leases and outleases are properties occupied by a non-government entity that remain titled to the Federal government.

Disposal. For the purposes of baseline calculation, a disposal is a sale, demolition, lease termination, public benefit conveyance, Federal transfer, or any other action that results in the removal of the asset from the inventory of the agency.

Domestic. Buildings located in the fifty United States, the District of Columbia, and the U.S. territories of American Samoa, Guam, Northern Mariana Islands, Puerto Rico, U.S. Minor Outlying Islands, and the U.S. Virgin Islands.

Hoteling. For the purposes of this Memorandum, hoteling is an arrangement where employees use non-dedicated, non-permanent workspaces assigned for use by reservation on an as-needed basis.

New Acquisition. Space that an agency built, purchased, or leased (directly or through a GSA occupancy agreement) in the most recently completed fiscal year.

Office Space (From FRPP Data Dictionary). Buildings primarily used for office space or military headquarters

Useable Square Feet – The definition provided the Building Owners and Managers Association's 2010 Floor Measurement Standard ANSI/BOMA Z65.1-2010. The total of occupant area and building amenity area on any floor level, and for the building.

Workstation. An office, cubicle, or open workspace where employees or contractors work, counted by individual seat.

Warehouse Space (From FRPP Data Dictionary). Buildings used for storage, such as

ammunition storage, covered sheds, and buildings primarily used for storage of vehicles or materials. Also included are underground or earth covered ammunition storage bunkers and magazines. This category excludes water reservoirs and petroleum, oil, and lubricants storage tanks which are storage structures.

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2 **Appendix D**

3 **Agency Correspondence**

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December 2, 2022

Mr. Bradley Hayes
Illinois DNR
Office of Realty & Environmental Planning
Illinois Dept. of Natural Resources
One Natural Resources Way
Springfield, IL 62702-1271

Subject: 202-220 South State Street, Chicago, IL

Dear Mr. Hayes:

The General Services Administration (GSA) is preparing an Environmental Impact Statement to assess the future of four buildings owned by GSA at 202, 208-212, 214 and 220 South State Street in downtown Chicago (Figure 1).

The buildings, which are vacant, are adjacent to the Dirksen U.S. Courthouse. Federal law enforcement agencies have concerns over the proximity of the four State Street buildings to the Dirksen U.S. Courthouse from a security standpoint and the federal government does not have a need for the space. Two of the four buildings are contributing elements of the Loop Retail Historic District.

GSA is currently considering three alternatives for the buildings:

- Demolition: The buildings would be demolished the site landscaped and secured
- Viable Adaptive Reuse: GSA will consider viable adaptive reuse alternatives if they meet the 15 criteria listed in the NOI (attached). No federal funds are available for rehabilitation, preservation, or restoration of buildings.
- No Action. GSA would take no action: The buildings would remain in place and vacant

In accordance with the National Environmental Policy Act, as amended (42 U.S.C. § 4321), Council on Environmental Quality Regulations 40 CFR 1500-1508), and the GSA Public Building Service NEPA Desk Guide (October 1999), GSA is evaluating the potential environmental, cultural and socioeconomic effects of these three alternatives.

Our recent ecoCAT search indicated “the Illinois Natural Heritage Database contains no record of State-listed threatened or endangered species, Illinois Natural Area Inventory sites, dedicated Illinois Nature Preserves, or registered Land and Water Reserves in the vicinity of the project location.”

The U.S. Fish & Wildlife Service has indicated they have no concerns about this project.

GSA is soliciting input from your office on the potential for this project to affect plant or animal species or other resources under your agency’s jurisdiction. So that we may complete our environmental review in a timely manner, GSA respectfully requests your review and input no later than thirty (30) days after receipt of the correspondence. If you have questions or require

additional information regarding this project please contact me at 312-810-2326 or michael.gonczar@gsa.gov.

Sincerely,

Michael Gonczar 12/2/2022

Michael Gonczar
Regional Environmental Quality Advisor

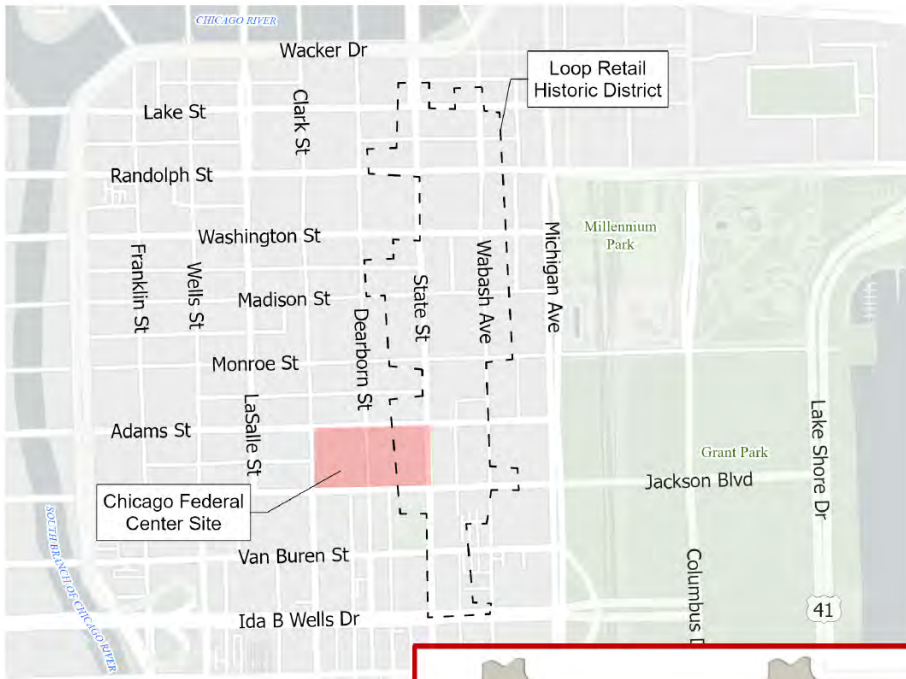
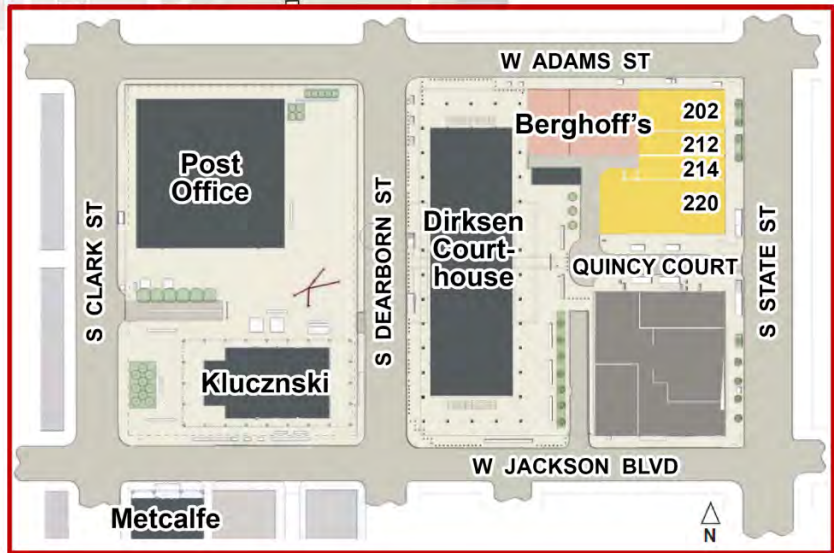


Figure 1. Site Location
 202, 208-212, 214, and 220
 South State Street in Chicago





Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
<http://dnr.state.il.us>

JB Pritzker, Governor

Natalie Phelps Finnie, Director

February 06, 2023

Michael Gonczar
General Services Administration
230 S. Dearborn St.
Suite 3600
Chicago, IL 60604

RE: 202, 208-212, 214 and 220 South State Street, Chicago
Project Number(s): 2308450 [2308442, 2307112]
County: Cook

Dear Applicant:

This letter is in reference to the project you recently submitted for consultation. The natural resource review provided by EcoCAT identified protected resources that may be in the vicinity of the proposed action. The Department has evaluated this information and concluded that adverse effects are unlikely. Therefore, consultation under 17 Ill. Adm. Code Part 1075 is terminated.

This consultation is valid for two years unless new information becomes available that was not previously considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of the project submittal, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, you must comply with the applicable statutes and regulations. Also, note that termination does not imply IDNR's authorization or endorsement of the proposed action.

Please contact me if you have questions regarding this review.

Bradley Hayes
Division of Ecosystems and Environment
217-785-5500

From: "'Cirton, Shawn' via State Street North Site" statestreet@gsa.gov
Subject: Re: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER22/0464 - Notice of Intent by the General Services Administration for Four Buildings at 202, 208–212, 214 and 220 South State Street - Chicago, Illinois
Date: November 03, 2022 at 4:56 PM EST
To: "statestreet@gsa.gov" statestreet@gsa.gov
cc: "Thatcher, Ben" ben_thatcher@fws.gov, "McPeck, Kraig", "Payne, Carlita", "Krska, Robert", "Green, Frankie A", "FERC, FW3", "ERs, FWS HQ"

The USGS has no comment at this time. Thank you.

From: oepchq@ios.doi.gov <oepchq@ios.doi.gov>
Sent: Tuesday, November 1, 2022 8:43 PM
To: Alam, Shawn K <Shawn_Alam@ios.doi.gov>; Braegelmann, Carol <carol_braegelmann@ios.doi.gov>; Kelly, Cheryl L <cheryl_kelly@ios.doi.gov>; Hathaway, Ryan S <ryan_hathaway@ios.doi.gov>; ERs, FWS HQ <FWS_HQ_ERs@fws.gov>; Runkel, Roxanne <Roxanne_Runkel@nps.gov>; Stedeford, Melissa <Melissa_Stedeford@nps.gov>; Hamlett, Stephanie R <shamlett@osmre.gov>; Janowicz, Jon A <jjanowicz@usgs.gov>; Gordon, Alison D <agordon@usgs.gov>; oepchq@ios.doi.gov <oepchq@ios.doi.gov>; Darby, Valincia <Valincia_Darby@ios.doi.gov>; Nelson, John V <John_Nelson@ios.doi.gov>
Subject: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER22/0464 - Notice of Intent by the General Services Administration for Four Buildings at 202, 208–212, 214 and 220 South State Street - Chicago, Illinois

This e-mail alerts you to a Environmental Review (ER) request from the Office of Environmental Policy and Compliance (OEPC). This ER can be accessed [here](#).

To access electronic ERs visit the Environmental Assignments website:

<https://ecl.doi.gov/ERs.cfm>. For assistance, please contact the Environmental Review Team at 202-208-5464.

Comments due to Agency by: 12/12/22



Michael Gonczar - 5P1FB <michael.gonczar@gsa.gov>

Re: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER22/0464 - Notice of Intent by the General Services Administration for Four Buildings at 202, 208–212, 214 and 220 South State Street - Chicago, Illinois

'Cirton, Shawn' via State Street North Site <statestreet@gsa.gov>

Thu, Nov 3, 2022 at 4:56 PM

Reply-To: "Cirton, Shawn" <shawn_cirton@fws.gov>

To: "statestreet@gsa.gov" <statestreet@gsa.gov>

Cc: "Thatcher, Ben" <ben_thatcher@fws.gov>, "McPeek, Kraig" <kraig_mcpeek@fws.gov>, "Payne, Carlita" <carlita_payne@fws.gov>, "Krska, Robert" <robert_krska@fws.gov>, "Green, Frankie A" <frankie_green@fws.gov>, "FERC, FW3" <fw3ferc@fws.gov>, "ERs, FWS HQ" <FWS_HQ_ERs@fws.gov>

To whom it may concern,

The USFWS does not have any substantive comments to offer regarding ER22/0464, Notice of Intent by the General Services Administration for Four Buildings at 202, 208212, 214 and 220 South State Street - Chicago, Illinois.

Sincerely,

Shawn Cirton
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Chicago Illinois Field Office
230 South Dearborn Street, Suite 2938
Chicago, IL 60604
(847)366-2345

From: ERs, FWS HQ <FWS_HQ_ERs@fws.gov>**Sent:** Thursday, November 3, 2022 3:38 PM**To:** Cirton, Shawn <shawn_cirton@fws.gov>; FERC, FW3 <fw3ferc@fws.gov>; Payne, Carlita <carlita_payne@fws.gov>; Krska, Robert <robert_krska@fws.gov>**Cc:** Thatcher, Ben <ben_thatcher@fws.gov>**Subject:** Fw: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER22/0464 - Notice of Intent by the General Services Administration for Four Buildings at 202, 208–212, 214 and [220 South State Street - Chicago, Illinois](#)

Project Title: Notice of intent by the General Services Administration for Four Buildings at 202, 208212, 214 and [220 South State Street -Chicago, Illinois](#)

FWS Directions:

FO - Comments due to GSA (statestreet@gsa.gov) by 12/12/22.

Please provide a copy of comments to HQ Branch of Environmental Review (FWS_HQ_ERs@fws.gov).

Thank you,

HQ Branch of Environmental Review*

*We check this inbox regularly. If you have time-sensitive questions, please contact:

Frankie Green

Fish and Wildlife Biologist

U.S. Fish and Wildlife Service

[Branch of Environmental Review](#)

[5275 Leesburg Pike](#)

[Falls Church, VA 22041-3803](#)

(703) 358-1884

From: oepchq@ios.doi.gov <oepchq@ios.doi.gov>


Sent: Tuesday, November 1, 2022 8:43 PM

To: Alam, Shawn K <Shawn_Alam@ios.doi.gov>; Braegelmann, Carol <carol_braegelmann@ios.doi.gov>; Kelly, Cheryl L <cheryl_kelly@ios.doi.gov>; Hathaway, Ryan S <ryan_hathaway@ios.doi.gov>; ERs, FWS HQ <FWS_HQ_ERs@fws.gov>; Runkel, Roxanne <Roxanne_Runkel@nps.gov>; Stedeford, Melissa <Melissa_Stedeford@nps.gov>; Hamle, Stephanie R <shamlett@osmre.gov>; Janowicz, Jon A <jjanowicz@usgs.gov>; Gordon, Alison D <agordon@usgs.gov>; oepchq@ios.doi.gov <oepchq@ios.doi.gov>; Darby, Valincia <Valincia_Darby@ios.doi.gov>; Nelson, John V <John_Nelson@ios.doi.gov>

Subject: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER22/0464 - Notice of Intent by the General Services Administration for Four Buildings at 202, 208-212, 214 and [220 South State Street - Chicago, Illinois](#)

This e-mail alerts you to a Environmental Review (ER) from the Office of Environmental Policy and Compliance (OEPC). This ER can be accessed [here](#). To access electronic ERs visit the Environmental Assignments website: <https://ecl.doi.gov/ERs.cfm>. For assistance, please contact the Environmental Review Team at 202-208-5464.

Comments due to Agency by: 12/12/22

 **20221102_ER 22-0464_summary from OEPC.pdf**
80K



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON
BOULEVARD CHICAGO, IL
60604-3590

December 12, 2022

REPLY TO THE ATTENTION OF:
Mail Code RM-19J

Joseph Mulligan
U.S. General Services Administration
230 S. Dearborn St., Suite 3600
Chicago, IL 60604

Re: Scoping Comments on the Four Buildings at 202, 208–212, 214 and 220 South State Street Project, City of Chicago, Cook County, Illinois

Dear Mr. Mulligan:

The U.S. Environmental Protection Agency has reviewed the November 1, 2022, *Notice of Intent (NOI) To Prepare an Environmental Impact Statement (EIS) and Initiate Section 106 Consultation* for the project referenced above. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The U.S. General Services Administration (GSA) is the lead agency under NEPA.

The project area includes four buildings on South State Street between Adams Street and Jackson Boulevard, adjacent to the Dirksen Federal Courthouse in Chicago's South Loop, downtown Chicago. Buildings reside in the Loop Retail Historic District listed in the National Register of Historic Places. Two of the four buildings, the Century Building (202 State Street) and the Consumers Building (220 South State Street) are identified as contributing structures to the historic district. The NOI states that the project purpose is to (1) address the potential security vulnerabilities associated with the buildings, (2) respond to the passing of the 2022 Consolidated Appropriations Act, which calls for the demolition of these buildings, and (3) effectively manage federal property. Enclosed please find EPA's detailed scoping comments, with recommendations on (1) the project description, purpose, need, and range of alternatives, (2) hazardous materials releases during demolition, (3) air quality, (4) children's health and safety, (5) historic preservation and tribal resources, (6) noise and vibrations, (7) environmental justice and community impacts, and (8) climate change.

Thank you for the opportunity to review this project. The National Archives and Records Administration and the Office of Management and Budget have mandated that Federal agencies transition business processes and recordkeeping to fully electronic environments. Please help achieve this goal by refraining from mailing paper materials to EPA. When the Draft EIS

becomes available, please send an electronic copy to Jen Tyler, the lead reviewer for this project, at tyler.jennifer@epa.gov. Ms. Tyler is available at (312) 886-6394 if you wish to discuss EPA's comments.

Sincerely,

Kathy Triantafillou

Kathy Triantafillou
Acting NEPA Section Supervisor
Tribal and Multimedia Programs Office
Office of the Regional Administrator

Enclosures: (1) Detailed Scoping Comments, (2) Construction Emission Control Checklist

ENCLOSURE 1: DETAILED SCOPING COMMENTS ON THE FOUR BUILDINGS AT 202, 208–212, 214 AND 220 SOUTH STATE STREET PROJECT, CHICAGO, ILLINOIS

Project Description, Purpose, Need, and Alternatives

Disclosing the project's purpose and need, and thereby allowing commenters to understand the root need that the project seeks to fulfill, may allow commenters to recommend additional feasible action alternatives.

Recommendations for the Draft Environmental Impact Statement (DEIS):

- Describe all elements of the proposed project and alternatives. For any proposed demolition, describe methods that would be employed and logistics of removing materials from the site. Describe plans for the site after demolition is complete (i.e., what would be left on the properties, what would the appearance be from State Street, etc.). Consider the potential for lag time prior to redevelopment.
- Include a Purpose and Need Statement that meets the requirements of the Council on Environmental Quality Regulations for Implementing NEPA (40 CFR § 1502.13). Ensure that the Purpose and Need Statement is broad enough to allow for a reasonable range of alternatives.
- Evaluate all reasonable alternatives, in line with the CEQ NEPA Regulations (40 CFR § 1502.14).
- Describe how the proposed project aligns with local and regional plans and policies.
- Discuss whether National Historic Preservation Act (NHPA) Section 110 applies to the project. If so, describe how GSA will meet the requirements of Section 110.

Construction and Demolition Debris and Building Materials

Best practices in demolishing buildings prevents the spread of dust and potentially hazardous materials, such as lead and asbestos, that were historically used in buildings. Demolishing buildings also presents opportunities for reuse and recycling of materials, which benefits the environment and preserves valuable landfill capacity.

Recommendations for the DEIS:

- Recycle construction and demolition debris to the greatest extent feasible.
- Discuss applicable practices from EPA's *Sustainable Management of Construction and Demolition Materials* webpage.¹ Best practices may also be applicable from *EPA's Large-Scale Residential Demolition* webpage.² Use these resources to help: (1) identify environmentally-sensitive activities associated with building removal and (2) develop contract language for bid packages with specific technical requirements to improve environmental results from demolition.
- Use recycled materials to replace raw materials for infrastructure components to the extent feasible. Consider use of recycled materials in pavement applications and to replace carbon-intensive Portland Cement in concrete. In some circumstances, on-site asphalt can also be re-used.

¹ <https://www.epa.gov/smm/sustainable-management-construction-and-demolition-materials>

² <https://www.epa.gov/large-scale-residential-demolition>

Air Quality

Construction activity would release air emissions from equipment engines, truck engines, and earthwork activity. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Diesel exhaust can also worsen heart and lung disease, especially in vulnerable populations, such as children and elderly people.

Recommendations for the DEIS:

- Discuss existing air quality conditions in the project area and disclose air quality impacts that could result from this project.
- Discuss whether the project area can be enclosed (e.g., with tarps) to capture dust and debris when demolishing the building.
- Require construction contractors to use best practices. Options include: (1) requiring specific idling time limits for construction trucks and heavy equipment, (2) locating construction equipment and staging zones away from fresh air intakes to buildings, and (3) soliciting bids that require zero-emission technologies or advanced emission control systems. Commit to applicable recommendations in the enclosed Construction Emissions Control Checklist.

Children's Health

Executive Order 13045 on children's health and safety directs each federal agency to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children and ensure that policies, programs, activities, and standards address these risks.

Recommendations for the DEIS:

Prior to construction, require a construction traffic management plan to ensure that trucks hauling materials and heavy machinery avoid areas where children congregate along the route to and from the project area, when possible. Route construction truck traffic away from schools, daycare facilities, and parks when possible, and use crossing guards when such areas cannot be avoided. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents.

NHPA and Tribal Resources

The NOI explains, "NHPA and NEPA are independent statutes, yet may be executed concurrently to optimize efficiencies, transparency, and accountability to better understand the effects to the human, natural, and cultural environment." EPA appreciates GSA's efforts to align processes and recognizes the benefits of doing so.

Recommendations for the DEIS:

- Describe GSA's approach to fulfilling NHPA Section 106 requirements. Document coordination and input received from the State Historic Preservation Officer and Tribes with ancestral ties to the land. Explain how GSA has and will continue to address input provided by the SHPO and Tribal representatives.
- Assess options for documenting historic building information prior to demolition.

- Commit to consult with Tribes with ancestral ties prior to any demolition.
- If buildings are demolished, describe the process for (1) addressing inadvertent discoveries (e.g., Tribal remains, artifacts, other culturally or historically sensitive items) and (2) complying with the Native American Graves Protection and Repatriation Act.

Noise and Vibration

If GSA selects an alternative that includes demolition, then there would be noise and vibration impacts from the project. EPA’s website discusses health effects associated with noise. “Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity...[R]esearch has shown that exposure to constant or high levels of noise can cause countless adverse health effects.”³

Recommendations for the DEIS:

- Identify noise and vibration sensitive receptors in the project area. Include residences, cultural and religious gathering spots, schools, day care centers, senior housing, community centers, medical facilities, and offices, among other. Assess how the project would impact such receptors.
- Disclose and compare noise and vibration impacts at specific noise sensitive locations for all project alternatives.
- If needed, consider measures to reduce or mitigate noise and vibration. This may include use of alternative equipment or limiting time windows when certain equipment may be used.

Environmental Justice (EJ) and Community Engagement

To promote environmental justice, Executive Order 12898 requires Federal agencies to identify and address disproportionately high and adverse impacts of all programs, policies, and activities on low income and/or minority populations. EPA encourages the use of EJScreen⁴ for EJ scoping efforts. EPA’s nationally consistent EJ screening and mapping tool is a useful first step in highlighting locations that may be candidates for further analysis. The tool can help identify potential community vulnerabilities by calculating EJ Indexes and displaying other environmental and socioeconomic information in color-coded maps and standard data reports (e.g., pollution sources, health disparities, critical service gaps, climate change data). EJScreen can also help focus environmental justice outreach efforts by identifying potential language barriers, meeting locations, tribal lands and indigenous areas, and lack of broadband access. For purposes of NEPA review, EPA considers a project to be in an area of potential EJ concern when the area shows one or more of the twelve EJ Indexes at or above the 80th percentile in the nation and/or state. However, scores under the 80th percentile should not be interpreted to mean there are definitively no EJ concerns present.

While EJScreen provides access to high-resolution environmental and demographic data, it does not provide information on every potential community vulnerability that may be relevant. The tool’s standard data report should not be considered a substitute for conducting a full EJ analysis, and scoping efforts using the tool should be supplemented with additional data and local knowledge. Also, in recognition of the inherent uncertainties with screening level data and to

³ <https://www.epa.gov/clean-air-act-overview/clean-air-act-title-iv-noise-pollution>

⁴ <https://www.epa.gov/ejscreen>

help address instances when the presence of EJ populations may be diluted (e.g., in large project areas or in rural locations), EPA recommends assessing each block group within the project area individually and adding an appropriate buffer around the project area. Please see the EJScreen Technical Documentation⁵ for a discussion of these and other issues.

Recommendations for the DEIS:

- Identify the presence of low-income and/or minority communities within the project area that could experience environmental impacts from the proposed project. Disclose demographic information. For initial screening, use EPA's EJScreen mapping tool. Use census-tract-level information to initially help locate communities with EJ concerns.
- Describe past activities and future plans to engage minority populations, low-income populations, and the surrounding community in the environmental review and planning phase, and, if the project commences, during demolition.
- Evaluate the impacts of this proposal on low-income and/or minority communities and sensitive receptors (e.g., children, people with asthma, etc.).
- Compare project impacts on low-income and minority populations with an appropriate reference community to determine whether there may be disproportionate impacts. Consider risk of exposure to hazardous/toxic materials associated with the proposed demolition and noise impacts.
- In conducting the EJ analysis, utilize resources such as the *Promising Practices Report*⁶ and the *Community Guide to EJ and NEPA Methods*⁷ to appropriately engage in meaningful, targeted, community outreach, analyze impacts, and advance environmental justice through NEPA implementation.
- Identify measures to (1) ensure meaningful community engagement, (2) minimize adverse community impacts, and (3) avoid disproportionate impacts to communities with EJ concerns.
- Consider cumulative environmental impacts to minority populations, low-income populations, and indigenous peoples in the project area within the environmental justice analysis and disclose GSA's conclusions.
- Include GSA's analysis and conclusion regarding whether the Proposed Action or any action alternatives may have disproportionately high and adverse impacts on low income or minority communities, as specified in CEQ's Environmental Justice Guidance.⁸
- Describe measures that GSA would take to avoid, minimize, or mitigate impacts any disproportionate impacts to communities with EJ concerns and impacts to other sensitive populations.

Greenhouse Gas Reduction (GHG) and Climate Change

Executive Order 14008: *Tackling the Climate Crisis at Home and Abroad* states, states "The United States and the world face a profound climate crisis. We have a narrow moment to pursue action...to avoid the most catastrophic impacts of that crisis and to seize the opportunity that

⁵ <https://www.epa.gov/ejscreen/technical-information-about-ejscreen>

⁶ https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

⁷ <https://www.energy.gov/sites/prod/files/2019/05/f63/NEPA%20Community%20Guide%202019.pdf>

⁸ CEQ's Environmental Justice Guidance Under the National Environmental Policy Act. See Section III, Part C-4.

https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf?VersionId=78iNGtdwSTz5E2x.H0aHq.E96_Tphbgd

tackling climate change presents.” The U.S. Global Change Research Program’s National Climate Assessment provides data and scenarios that may be helpful in assessing trends in temperature, precipitation, and frequency and severity of storm events.⁹ The proposed project would release GHG emissions during construction from trucks hauling materials, workers’ vehicles, and operation of construction equipment. It is important for the DEIS to fully quantify and disclose emissions from the proposed action.

In addition, estimates of the social cost of greenhouse gases (SC-GHG¹⁰) are informative for assessing the impacts of GHG emissions. SC-GHG estimates monetize the societal value of changes in GHG emissions from actions that have small, or marginal, impacts on cumulative global emissions. Estimates of the social cost of carbon (SC-CO₂) and other greenhouse gases (e.g., social cost of methane (SC-CH₄)) have been used for over a decade in Federal government analyses. Quantification of anticipated GHG releases and associated SC-GHG comparisons among all alternatives (including the No Action Alternative) within the DEIS could inform project decision-making and provide support for implementing all practicable measures to minimize GHG emissions.

Recommendations for the DEIS:

Emissions & SC-GHG Disclosure and Analysis

- Quantify reasonably foreseeable direct (e.g., construction) and indirect (off-site material hauling and disposal) GHG emissions.
- Use SC-GHG estimates to consider the climate damages from net changes in direct and indirect emissions of CO₂ and other GHGs from the proposed project. To do so, EPA recommends a breakdown of estimated net GHG emission changes by individual gas, rather than relying on CO₂-equivalent (CO₂e) estimates, and then monetize the climate impacts associated with each GHG using the corresponding social cost estimate (i.e., monetize CH₄ emissions changes expected to occur with the social cost of methane (SC-CH₄) estimate for emissions).¹¹ When applying SC-GHG estimates, just as with tools to quantify emissions, disclose the assumptions (e.g., discount rates) and uncertainties associated with such analysis and the need for updates over time to reflect evolving science and economics of climate impacts.
- Compare GHG emissions and SC-GHG across alternatives to inform project decision-making.

Resilience and Adaptation

- Describe changing climate conditions (i.e., temperatures and frequency and severity of storm events) and assess how such changes could impact the proposed project and

⁹ Information on changing climate conditions is available through the National Climate Assessment at: <http://nca2018.globalchange.gov>

¹⁰ EPA uses the general term, “social cost of greenhouse gases” (SC-GHG), where possible because analysis of GHGs other than CO₂ are also relevant when assessing the climate damages resulting from GHG emissions. The social cost of carbon (SC-CO₂), social cost of methane (SC-CH₄), and social cost of nitrous oxide (SC-N₂O) can collectively be referenced as the SC-GHG.

¹¹ Transforming gases into CO₂e using Global Warming Potential (GWP) metrics, and then multiplying the CO₂e tons by the SC-CO₂, is not as accurate as a direct calculation of the social costs of non-CO₂ GHGs. This is because GHGs differ not just in their potential to absorb infrared radiation over a given time frame, but also in the temporal pathway of their impact on radiative forcing and in their impacts on physical endpoints other than temperature change, both of which are relevant for estimating their social cost but not reflected in the GWP. See the Interagency Working Group on Social Cost of Greenhouse Gases’ February 2021 *Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990* for more discussion and the range of annual SC-CO₂, SC-CH₄, and SC-N₂O estimates currently used in Federal benefit-costs analyses.

- the environmental impacts of the proposed project and alternatives. Consider increases in frequency and severity of storm events, flooding, and periods of high heat.
- Describe climate resilience and adaption considerations for (1) construction plans; (2) emergency planning; (3) stormwater management; and (5) maintenance and monitoring of the site post demolition.

Reduction and Mitigation

- Identify practices GSA could take to reduce and mitigate GHG emissions; include commitments in the DEIS and in permit conditions, if applicable. Consider practices in the enclosed Construction Emission Control Checklist.

Public Outreach & Implementation of Mitigation

We encourage GSA to keep the surrounding community informed of protective measures that construction contractors will be required to follow.

Recommendations for the DEIS:

List all applicable measures (such as specific time restrictions for construction vehicle idling and noise generation, among others) on a bulletin, and post the bulletin at easily visible locations within and adjacent to the project area. Include a contact name and telephone number for people to call if they have questions or observe protective measures not being followed. We also recommend prominently posting such information on GSA's website and at nearby community buildings.

ENCLOSURE 2: CONSTRUCTION EMISSION CONTROL CHECKLIST

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.¹² We recommend GSA consider the following protective measures and commit to applicable measures in the DEIS.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).¹³
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).¹⁴
- Locomotives: Locomotives servicing infrastructure sites should meet, or exceed, the EPA Tier 4 exhaust emissions standards for line-haul and switch locomotive engines where possible.
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).¹⁵
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).

¹² Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. *The Lancet*. June 15, 2012

¹³ <http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm>

¹⁴ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

¹⁵ <https://www.epa.gov/emission-standards-reference-guide/all-epa-emission-standards>

- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a NIOSH approval number.

Applicant: General Services Administration
Contact: Michael Gonczar
Address: 230 S. Dearborn St.
Suite 3600
Chicago, IL 60604

IDNR Project Number: 2308442
Date: 12/30/2022

Project: 202, 208-212, 214 and 220 South State Street, Chicago
Address: 202, 208-212, 214 and 220 South State Street, Chicago

Description: Evaluation of the future of the buildings which are owned by GSA.

Natural Resource Review Results

This project was submitted for information only. It is not a consultation under Part 1075.

The Illinois Natural Heritage Database contains no record of State-listed threatened or endangered species, Illinois Natural Area Inventory sites, dedicated Illinois Nature Preserves, or registered Land and Water Reserves in the vicinity of the project location.

Location

The applicant is responsible for the accuracy of the location submitted for the project.

County: Cook

Township, Range, Section:

39N, 14E, 15

39N, 14E, 16



IL Department of Natural Resources

Contact

Impact Assessment Section

217-785-5500

Division of Ecosystems & Environment

Government Jurisdiction

Other

Disclaimer

The Illinois Natural Heritage Database cannot provide a conclusive statement on the presence, absence, or condition of natural resources in Illinois. This review reflects the information existing in the Database at the time of this inquiry, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, compliance with applicable statutes and regulations is required.

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Applicant: General Services Administration
Contact: Michael Gonczar
Address: 230 S. Dearborn St.
Suite 3600
Chicago, IL 60604

IDNR Project Number: 2308450
Date: 12/30/2022
Alternate Number: 2308442, 2307112

Project: 202, 208-212, 214 and 220 South State Street, Chicago
Address: 202, 208-212, 214 and 220 South State Street, Chicago, Chicago

Description: Evaluation of the future of the buildings which are owned by GSA.

Natural Resource Review Results

Thank you for submitting this project for review through the IDNR Comprehensive Environmental Review Process. An IDNR staff member will contact you regarding the results of the Department's review.

Location

The applicant is responsible for the accuracy of the location submitted for the project.

County: Cook

Township, Range, Section:

39N, 14E, 15

39N, 14E, 16



IL Department of Natural Resources

Contact

Justin Dillard

217-785-5500

Division of Ecosystems & Environment

Disclaimer

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Security

EcoCAT operates on a state of Illinois computer system. We may use software to monitor traffic and to identify unauthorized attempts to upload, download, or change information, to cause harm or otherwise to damage this site. Unauthorized attempts to upload, download, or change information on this server is strictly prohibited by law.

Unauthorized use, tampering with or modification of this system, including supporting hardware or software, may subject the violator to criminal and civil penalties. In the event of unauthorized intrusion, all relevant information regarding possible violation of law may be provided to law enforcement officials.

Privacy

EcoCAT generates a public record subject to disclosure under the Freedom of Information Act. Otherwise, IDNR uses the information submitted to EcoCAT solely for internal tracking purposes.



July 10, 2023

Federal Consistency Coordinator
Illinois Coastal Management Program
Illinois Department of Natural Resources
160 N LaSalle, Ste 700
Chicago IL 60601

RE: 202 to 220 South State Street, Chicago, Illinois, coastal zone negative determination

This letter provides the Illinois Department of Natural Resources with the General Service Administration's (GSA) Negative Determination under Section 307 of the CZMA, Title 16 United States Code Section 1456, and Title 15 Code of Federal Regulations Section 930.35.

GSA has prepared a Draft Environmental Impact Statement (EIS) to assess the environmental impact for the future of federally owned vacant buildings adjacent to the Everett McKinley Dirksen United States Courthouse in downtown Chicago, Illinois. The three buildings are at 202, 214, and 220 South State Street. Two of the buildings, the 16-story Century Building (202 South State Street) and the 21-story Consumers Building (220 South State Street), are contributing structures of the Loop Retail Historic District, which is listed on the National Register of Historic Places (National Register). A fourth building at 208-212 South State Street is being demolished under an emergency action due to its condition, which posed an immediate threat to human health and safety.

Federal law enforcement agencies extensively studied and determined that the buildings pose a specific and significant security threat to the Dirksen Courthouse. The purpose of the Proposed Action is to address the security needs of the Dirksen Courthouse. The Proposed Action is needed to address security, respond to Congressional intent in the 2022 Consolidated Appropriations Act, and GSA's federal asset management responsibilities.

The EIS analyzes three alternatives. Alternative A, Demolition, would demolish the three vacant buildings at 202, 214, and 220 South State Street. Alternative B, Viable Adaptive Reuse, would involve GSA collaborating with one or more developers who would use the buildings in accordance with fifteen viable adaptive reuse criteria. The EIS also includes a No Action Alternative as a baseline for the assessment.

After review of the Illinois Coastal Management Plan and its enforceable policies, GSA has decided that this Proposed Action would not affect the state of Illinois coastal zones or its resources, as outlined below:

- Category 1: Public Waters, Navigation and the Public Interest.
 - The project would not occur in Lake Michigan, would not divert or withdraw water from the lake for any purpose, would not affect any natural areas, and would not develop public parks or recreational resources.
- Category 2: Erosion and Flooding.
 - The project would not occur in Lake Michigan, would not manage public water supplies, would not degrade or decline the sustainability of groundwater supplies, and would not affect any natural areas.
- Category 3: Water Quality and Water Supply.

- The project would not occur in Lake Michigan, would not divert or withdraw water from Lake Michigan, would not manage public water resources, and would not affect any natural areas.
- Category 4: Habitats, Wetlands, and Wildlife.
 - The project would not occur in Lake Michigan or any other public waters or flood plain areas, would not degrade or decline the sustainability of groundwater supplies, would not affect any natural areas, would not harvest fish for commerce or sport, and would not develop public parks or recreational resources.
- Category 5: Historic, Archaeological and Cultural Resources.
 - The project could affect buildings that contribute to a National Register of Historic Places District. However, no buildings on the Illinois Register of Historic Places would be affected.
- Category 6: Recreation and Public Access.
 - The project would not occur in Lake Michigan or other public waters, would not degrade or decline the sustainability of groundwater supplies, would not affect any natural areas, and would not develop public parks or recreational resources.
- Category 7: Economic Development.
 - The project would not occur in Lake Michigan or other public waters, would not divert or withdraw water from Lake Michigan, would not require management of public water supplies, would not degrade or decline the sustainability of groundwater supplies, would not affect natural areas, would not impact highways, would not emit air pollutants from point sources, would not develop public parks or recreational resources, and would not redevelop brownfields.
- Category 8: Energy Facilities and Air Quality.
 - The project would not occur in Lake Michigan or other public waters, would not divert or withdraw water from Lake Michigan, would not site electrical generating or high voltage transmission lines, would not emit air pollutants from point sources, would not site energy facilities, and would not require storing or transporting energy resources.

If you have any questions or need additional information regarding the project, please contact me at michael.gonczar@gsa.gov.

Sincerely,

Michael Gonczar
Regional Environmental Quality Advisor
GSA, Great Lakes Region
(312) 810-2326
michael.gonczar@gsa.gov

Enclosures:

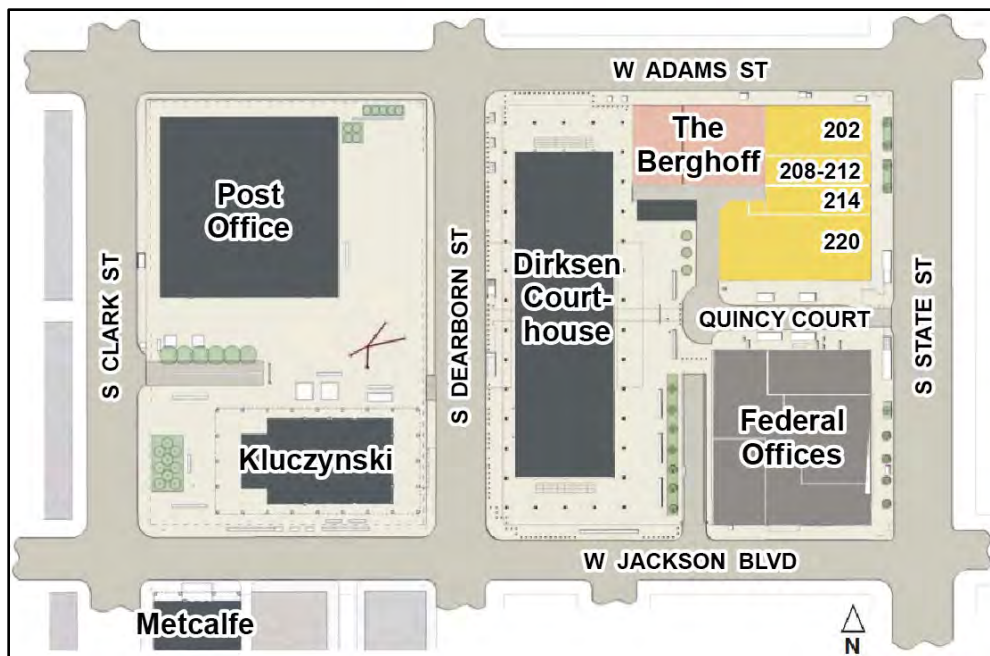
Attachment 1: Project Location Maps



Site Location Map



Site Aerial View



1

2

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1

2 **Appendix E**
3 **EJScreen Output**

1

2

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EJScreen Report (Version 2.1)

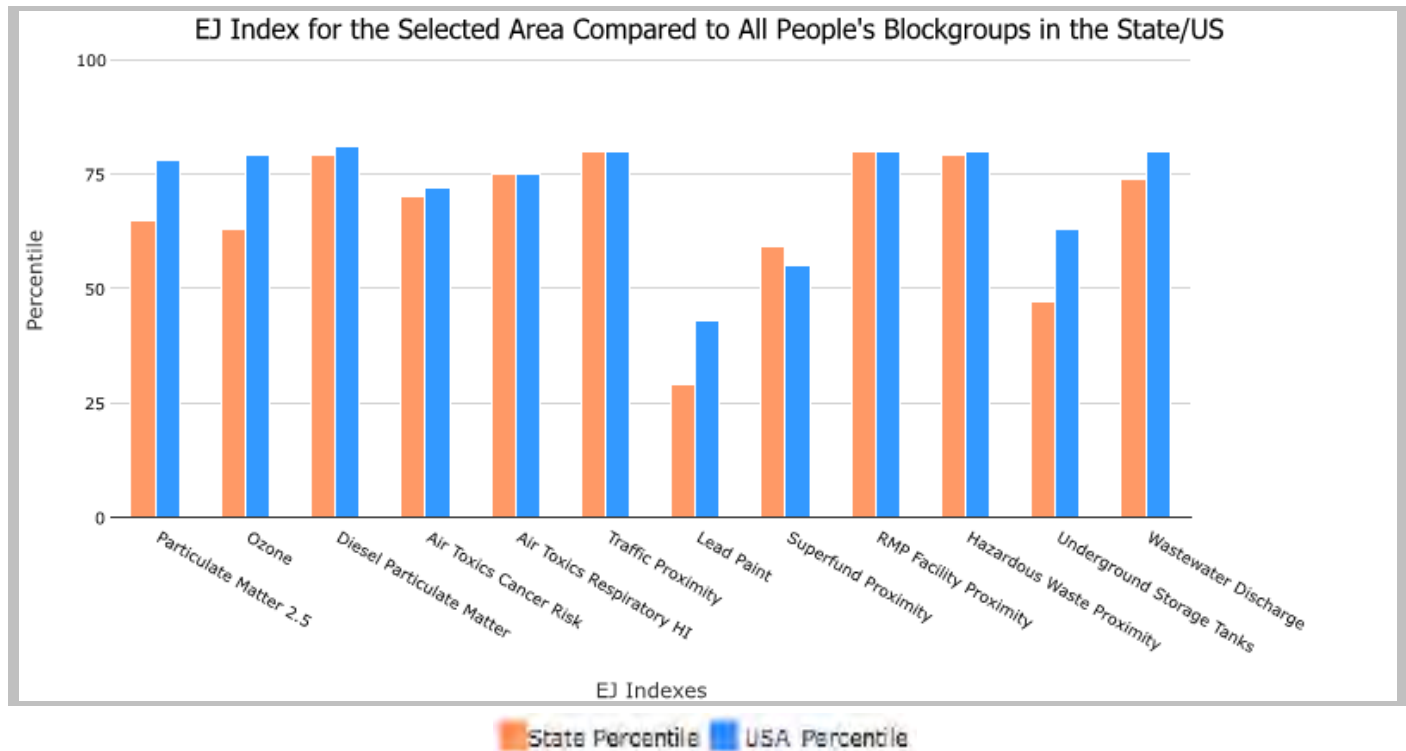


Blockgroup: 170313201011, ILLINOIS, EPA Region 5

Approximate Population: 3,886

Input Area (sq. miles): 0.05

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	65	78
EJ Index for Ozone	63	79
EJ Index for Diesel Particulate Matter*	79	81
EJ Index for Air Toxics Cancer Risk*	70	72
EJ Index for Air Toxics Respiratory HI*	75	75
EJ Index for Traffic Proximity	80	80
EJ Index for Lead Paint	29	43
EJ Index for Superfund Proximity	59	55
EJ Index for RMP Facility Proximity	80	80
EJ Index for Hazardous Waste Proximity	79	80
EJ Index for Underground Storage Tanks	47	63
EJ Index for Wastewater Discharge	74	80



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

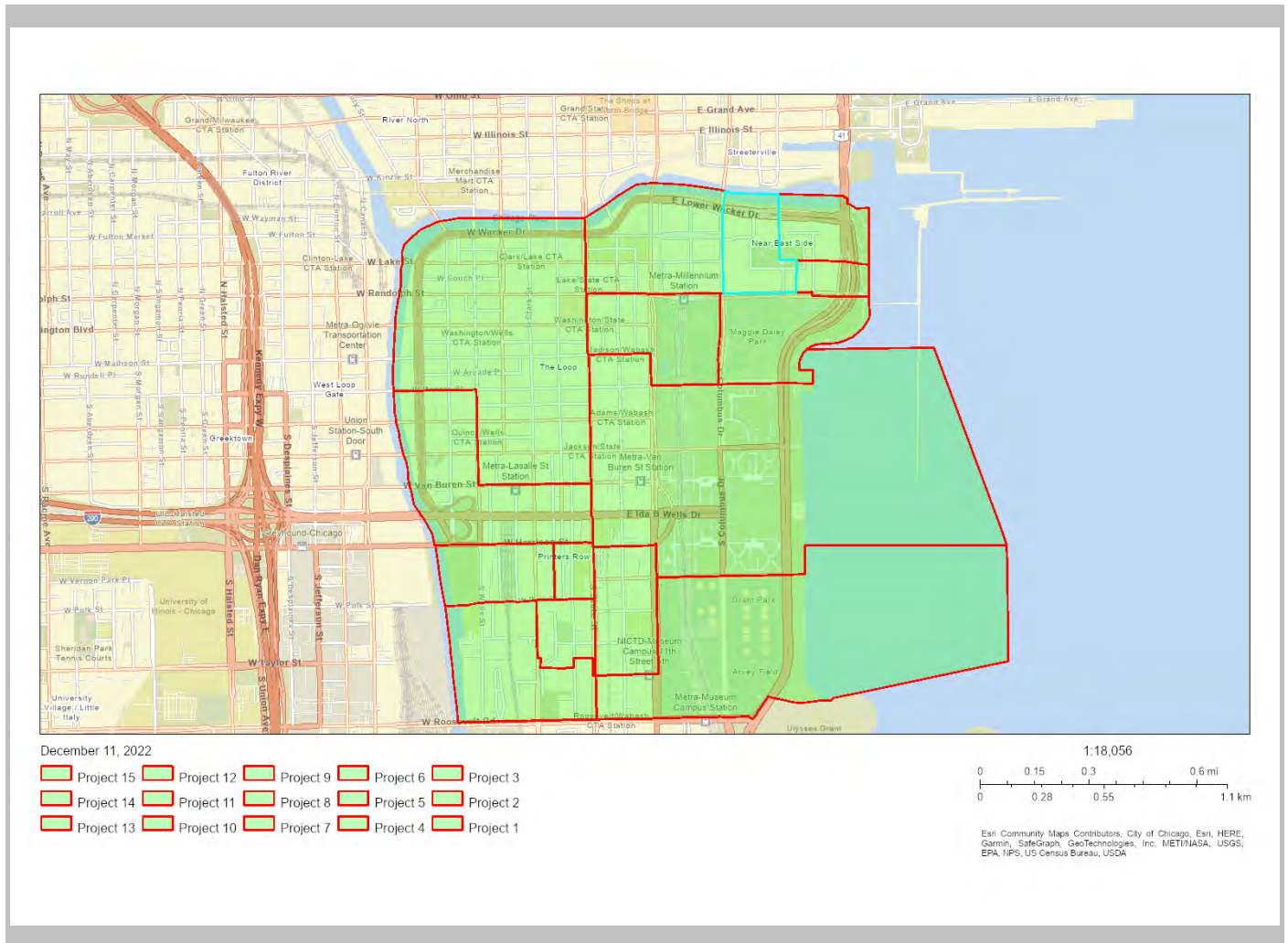
EJScreen Report (Version 2.1)



Blockgroup: 170313201011, ILLINOIS, EPA Region 5

Approximate Population: 3,886

Input Area (sq. miles): 0.05



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

Blockgroup: 170313201011, ILLINOIS, EPA Region 5

Approximate Population: 3,886

Input Area (sq. miles): 0.05



Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.2	9.92	57	8.67	87
Ozone (ppb)	45.3	45.2	50	42.5	78
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.61	0.396	98	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	6400	760	98	760	98
Lead Paint (% Pre-1960 Housing)	0.058	0.4	14	0.27	27
Superfund Proximity (site count/km distance)	0.043	0.095	42	0.13	38
RMP Facility Proximity (facility count/km distance)	7.7	1.2	99	0.77	99
Hazardous Waste Proximity (facility count/km distance)	24	2.7	99	2.2	99
Underground Storage Tanks (count/km ²)	1.4	8.6	30	3.9	52
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.085	27	63	12	84
Socioeconomic Indicators					
Demographic Index	36%	34%	62	35%	59
People of Color	57%	39%	72	40%	71
Low Income	14%	27%	27	30%	25
Unemployment Rate	4%	6%	48	5%	52
Limited English Speaking Households	5%	4%	74	5%	74
Less Than High School Education	20%	10%	84	12%	81
Under Age 5	3%	6%	24	6%	27
Over Age 64	31%	16%	92	16%	90

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

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EJScreen Report (Version 2.1)

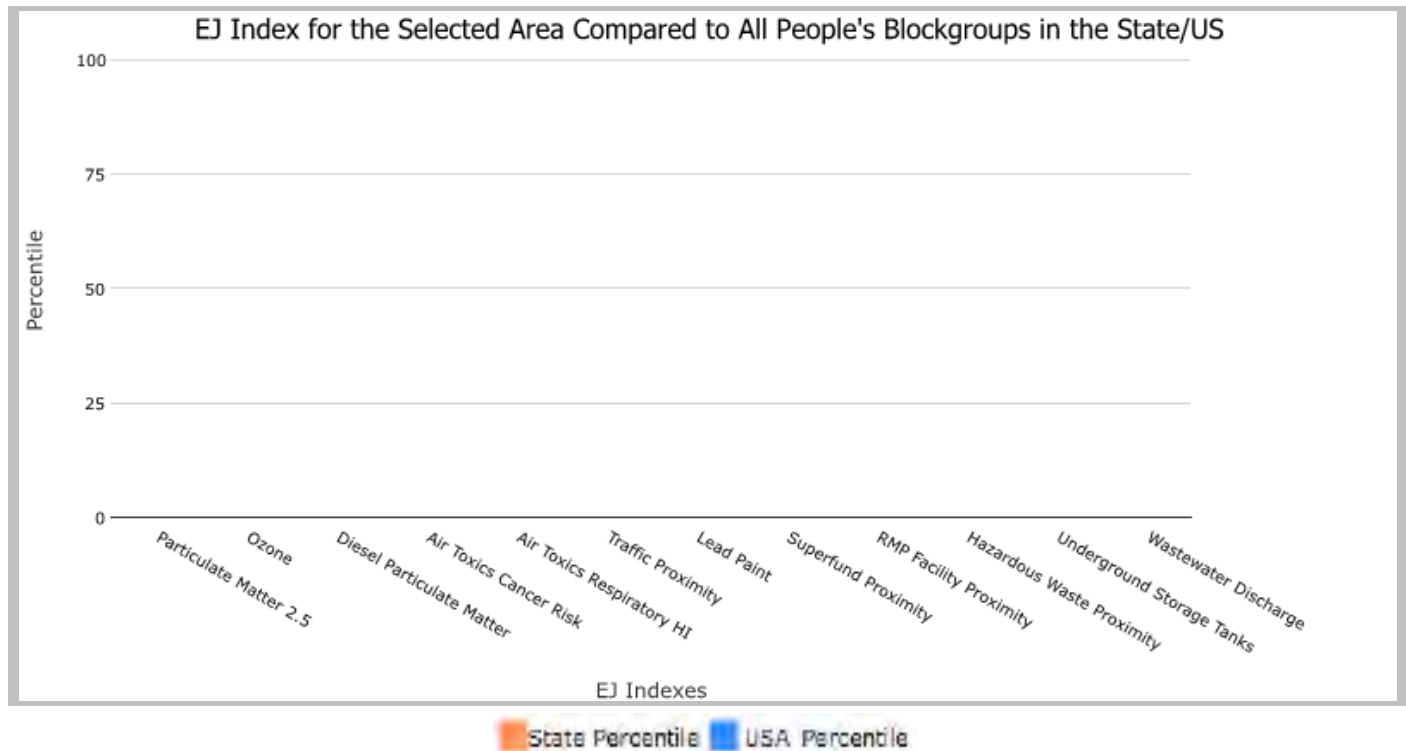


Blockgroup: 170313201012, ILLINOIS, EPA Region 5

Approximate Population: 153

Input Area (sq. miles): 0.08

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	0	0
EJ Index for Ozone	0	0
EJ Index for Diesel Particulate Matter*	0	0
EJ Index for Air Toxics Cancer Risk*	0	0
EJ Index for Air Toxics Respiratory HI*	0	0
EJ Index for Traffic Proximity	0	0
EJ Index for Lead Paint	0	0
EJ Index for Superfund Proximity	0	0
EJ Index for RMP Facility Proximity	0	0
EJ Index for Hazardous Waste Proximity	0	0
EJ Index for Underground Storage Tanks	0	0
EJ Index for Wastewater Discharge	0	0



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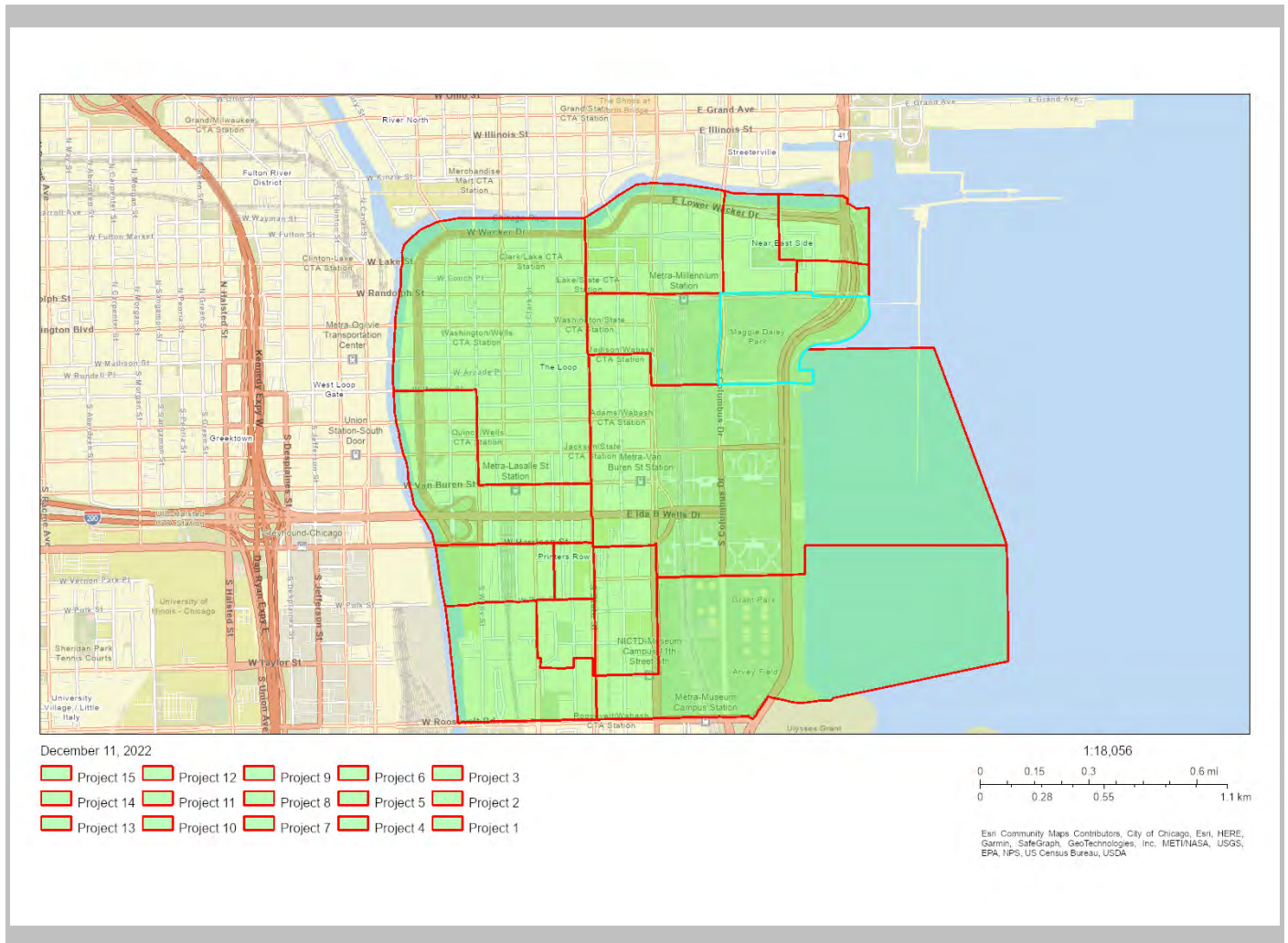
EJScreen Report (Version 2.1)



Blockgroup: 170313201012, ILLINOIS, EPA Region 5

Approximate Population: 153

Input Area (sq. miles): 0.08



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

Blockgroup: 170313201012, ILLINOIS, EPA Region 5

Approximate Population: 153

Input Area (sq. miles): 0.08

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.2	9.92	57	8.67	87
Ozone (ppb)	45.3	45.2	50	42.5	78
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.61	0.396	98	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	7600	760	98	760	98
Lead Paint (% Pre-1960 Housing)	0	0.4	0	0.27	0
Superfund Proximity (site count/km distance)	0.043	0.095	43	0.13	39
RMP Facility Proximity (facility count/km distance)	13	1.2	99	0.77	99
Hazardous Waste Proximity (facility count/km distance)	19	2.7	99	2.2	99
Underground Storage Tanks (count/km ²)	4.9	8.6	51	3.9	77
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.074	27	61	12	83
Socioeconomic Indicators					
Demographic Index	0%	34%	0	35%	0
People of Color	0%	39%	0	40%	0
Low Income	0%	27%	0	30%	0
Unemployment Rate	0%	6%	0	5%	0
Limited English Speaking Households	0%	4%	0	5%	0
Less Than High School Education	0%	10%	0	12%	0
Under Age 5	53%	6%	99	6%	99
Over Age 64	0%	16%	0	16%	0

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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EJScreen Report (Version 2.1)

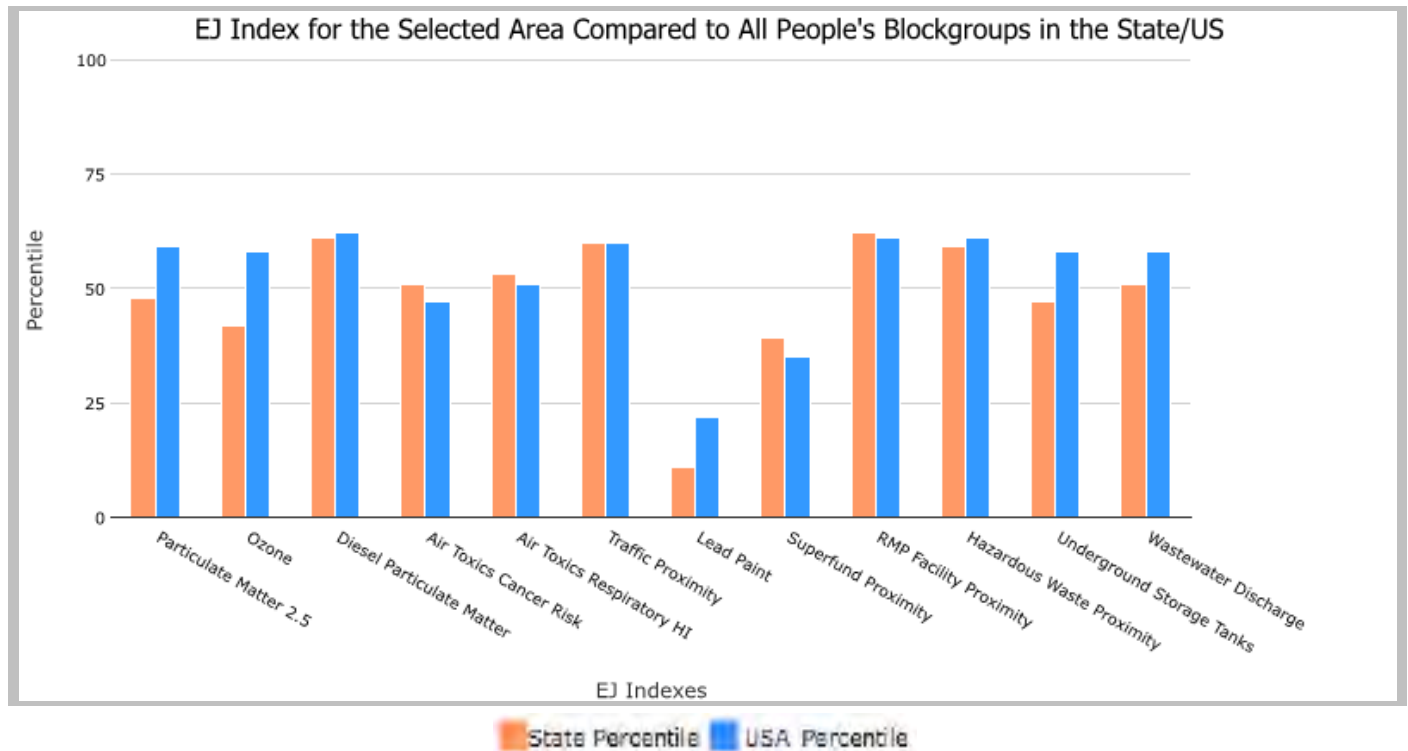


Blockgroup: 170313201013, ILLINOIS, EPA Region 5

Approximate Population: 2,541

Input Area (sq. miles): 0.04

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	48	59
EJ Index for Ozone	42	58
EJ Index for Diesel Particulate Matter*	61	62
EJ Index for Air Toxics Cancer Risk*	51	47
EJ Index for Air Toxics Respiratory HI*	53	51
EJ Index for Traffic Proximity	60	60
EJ Index for Lead Paint	11	22
EJ Index for Superfund Proximity	39	35
EJ Index for RMP Facility Proximity	62	61
EJ Index for Hazardous Waste Proximity	59	61
EJ Index for Underground Storage Tanks	47	58
EJ Index for Wastewater Discharge	51	58



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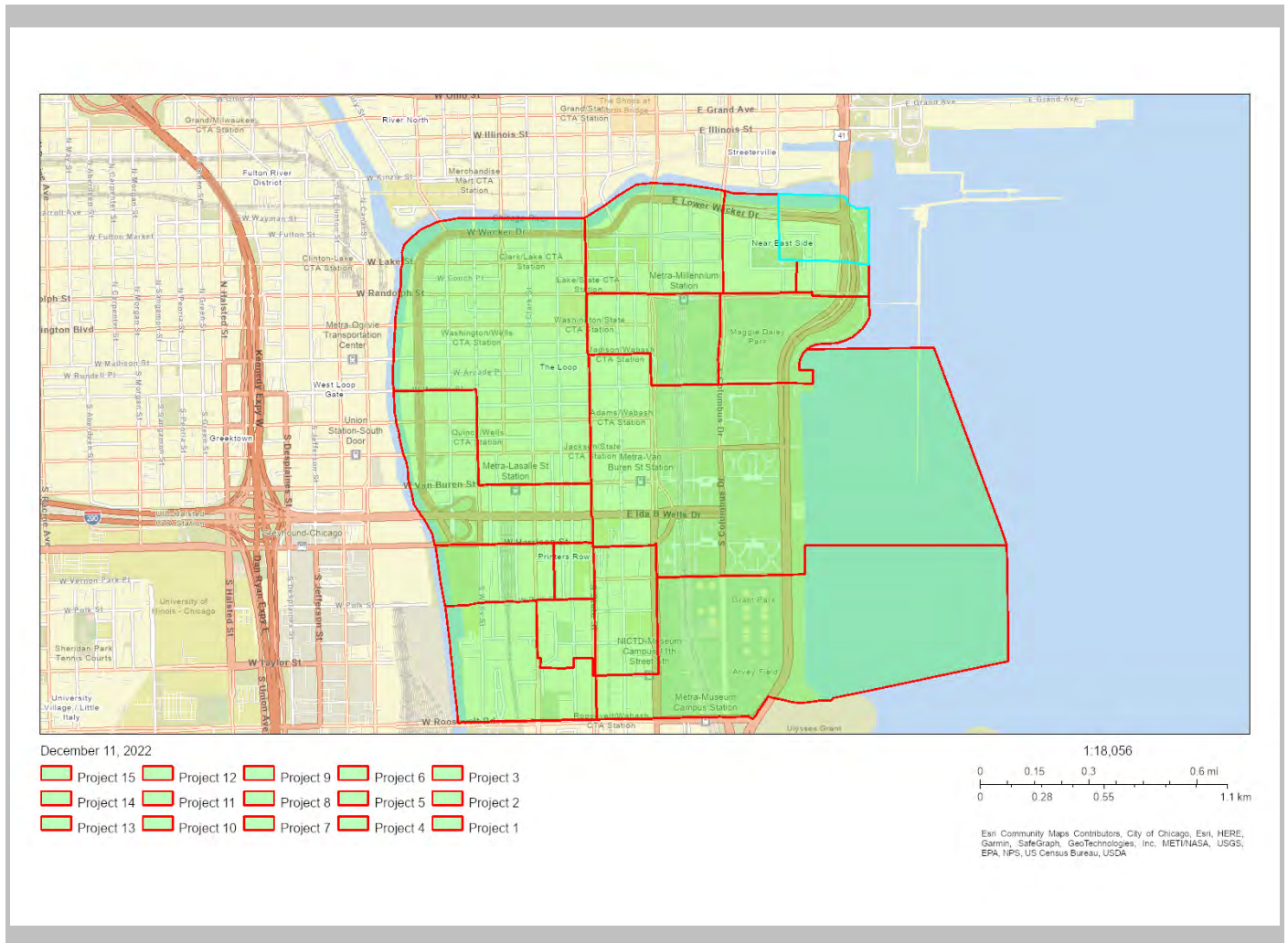
EJScreen Report (Version 2.1)



Blockgroup: 170313201013, ILLINOIS, EPA Region 5

Approximate Population: 2,541

Input Area (sq. miles): 0.04



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

Blockgroup: 170313201013, ILLINOIS, EPA Region 5

Approximate Population: 2,541

Input Area (sq. miles): 0.04



Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.2	9.92	57	8.67	87
Ozone (ppb)	45.3	45.2	50	42.5	78
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.61	0.396	98	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	9400	760	99	760	99
Lead Paint (% Pre-1960 Housing)	0.026	0.4	9	0.27	20
Superfund Proximity (site count/km distance)	0.043	0.095	42	0.13	38
RMP Facility Proximity (facility count/km distance)	4.2	1.2	95	0.77	98
Hazardous Waste Proximity (facility count/km distance)	16	2.7	98	2.2	98
Underground Storage Tanks (count/km ²)	7	8.6	59	3.9	83
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.071	27	60	12	83
Socioeconomic Indicators					
Demographic Index	18%	34%	33	35%	29
People of Color	30%	39%	51	40%	50
Low Income	7%	27%	12	30%	12
Unemployment Rate	6%	6%	59	5%	63
Limited English Speaking Households	0%	4%	0	5%	0
Less Than High School Education	0%	10%	0	12%	0
Under Age 5	0%	6%	0	6%	0
Over Age 64	12%	16%	37	16%	37

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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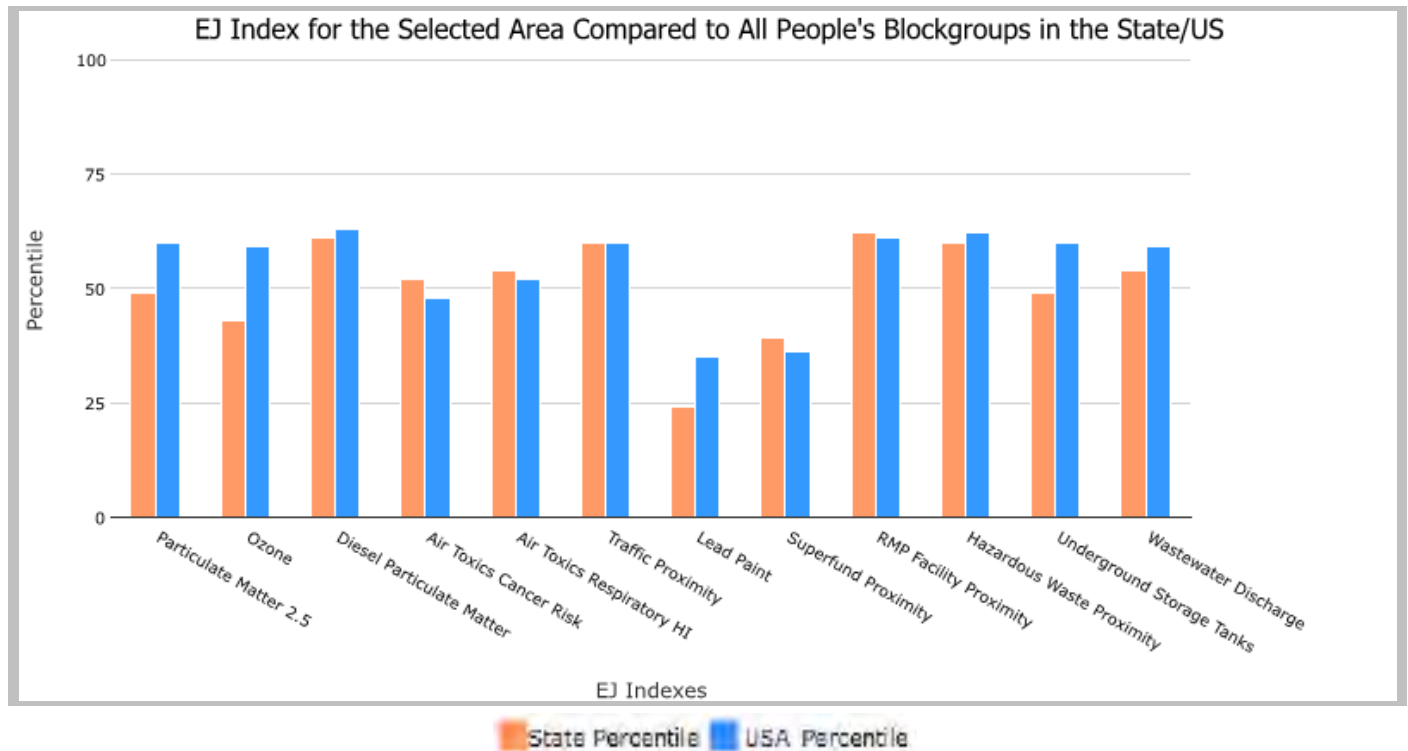


Blockgroup: 170313201021, ILLINOIS, EPA Region 5

Approximate Population: 3,524

Input Area (sq. miles): 0.11

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	49	60
EJ Index for Ozone	43	59
EJ Index for Diesel Particulate Matter*	61	63
EJ Index for Air Toxics Cancer Risk*	52	48
EJ Index for Air Toxics Respiratory HI*	54	52
EJ Index for Traffic Proximity	60	60
EJ Index for Lead Paint	24	35
EJ Index for Superfund Proximity	39	36
EJ Index for RMP Facility Proximity	62	61
EJ Index for Hazardous Waste Proximity	60	62
EJ Index for Underground Storage Tanks	49	60
EJ Index for Wastewater Discharge	54	59



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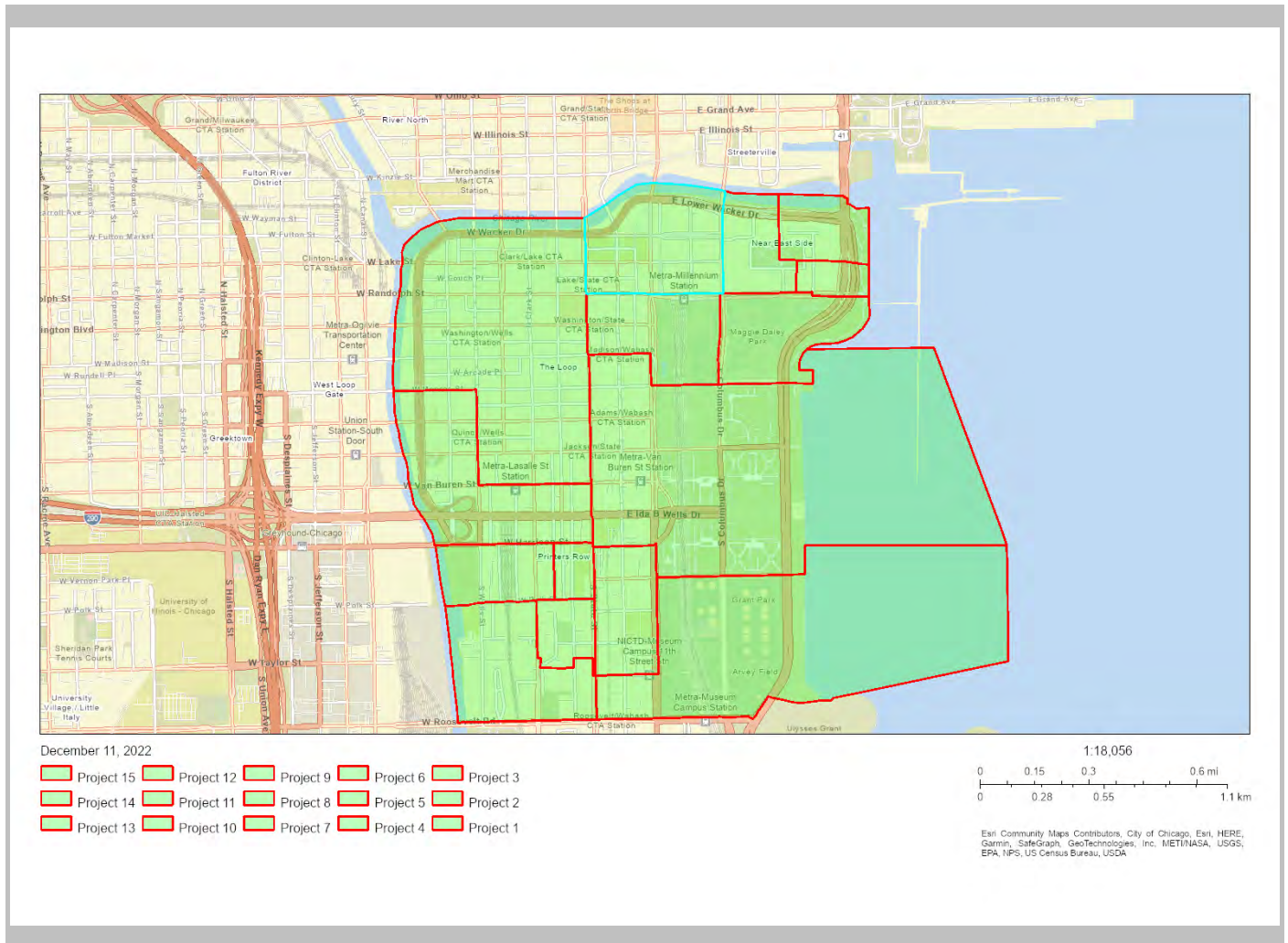
EJScreen Report (Version 2.1)



Blockgroup: 170313201021, ILLINOIS, EPA Region 5

Approximate Population: 3,524

Input Area (sq. miles): 0.11



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1

EJScreen Report (Version 2.1)

Blockgroup: 170313201021, ILLINOIS, EPA Region 5

Approximate Population: 3,524

Input Area (sq. miles): 0.11



Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.2	9.92	57	8.67	87
Ozone (ppb)	45.3	45.2	50	42.5	78
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.61	0.396	98	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	5100	760	97	760	97
Lead Paint (% Pre-1960 Housing)	0.13	0.4	22	0.27	39
Superfund Proximity (site count/km distance)	0.043	0.095	42	0.13	38
RMP Facility Proximity (facility count/km distance)	4.5	1.2	96	0.77	98
Hazardous Waste Proximity (facility count/km distance)	25	2.7	99	2.2	99
Underground Storage Tanks (count/km ²)	8.4	8.6	64	3.9	86
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.11	27	65	12	85
Socioeconomic Indicators					
Demographic Index	19%	34%	33	35%	30
People of Color	24%	39%	45	40%	44
Low Income	13%	27%	25	30%	23
Unemployment Rate	4%	6%	44	5%	49
Limited English Speaking Households	8%	4%	82	5%	82
Less Than High School Education	0%	10%	0	12%	0
Under Age 5	0%	6%	0	6%	0
Over Age 64	5%	16%	6	16%	8

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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EJScreen Report (Version 2.1)

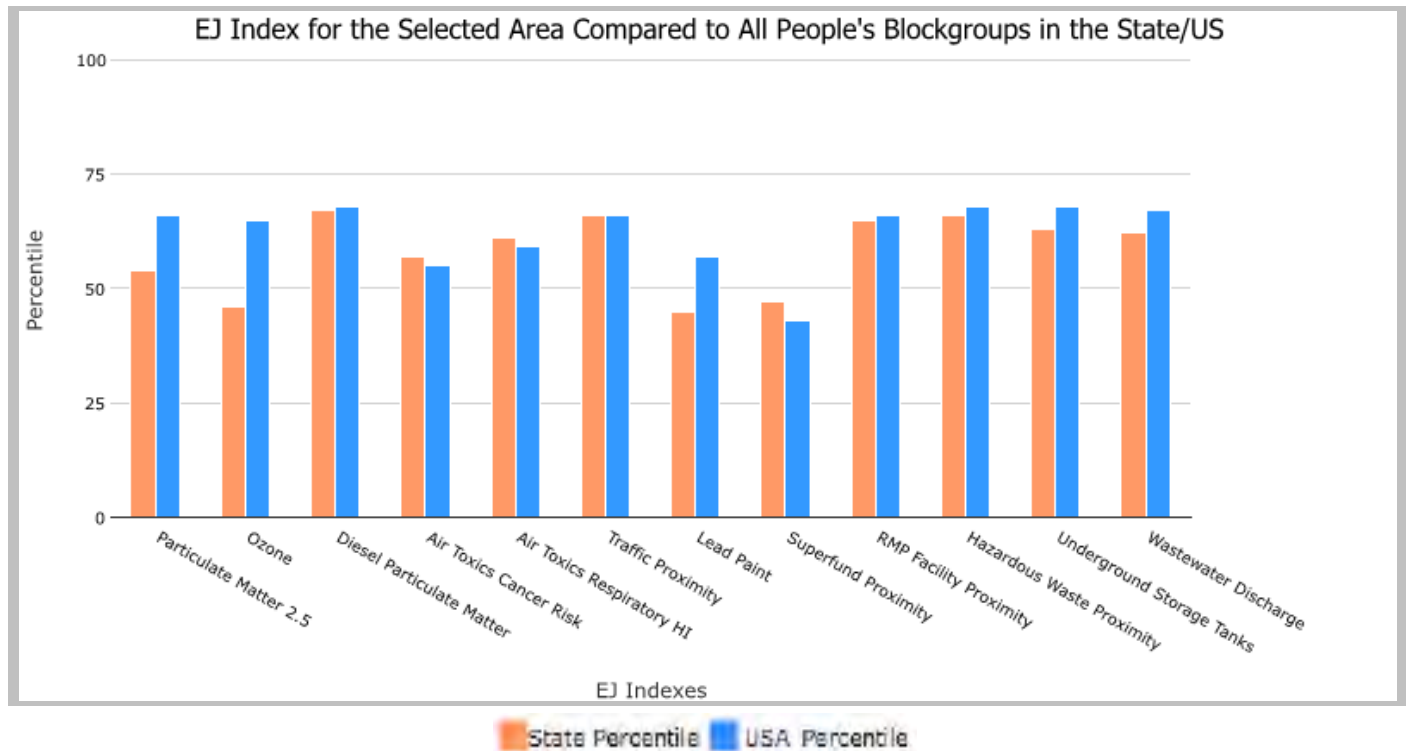


Blockgroup: 170313204001, ILLINOIS, EPA Region 5

Approximate Population: 3,049

Input Area (sq. miles): 0.56

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	54	66
EJ Index for Ozone	46	65
EJ Index for Diesel Particulate Matter*	67	68
EJ Index for Air Toxics Cancer Risk*	57	55
EJ Index for Air Toxics Respiratory HI*	61	59
EJ Index for Traffic Proximity	66	66
EJ Index for Lead Paint	45	57
EJ Index for Superfund Proximity	47	43
EJ Index for RMP Facility Proximity	65	66
EJ Index for Hazardous Waste Proximity	66	68
EJ Index for Underground Storage Tanks	63	68
EJ Index for Wastewater Discharge	62	67



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

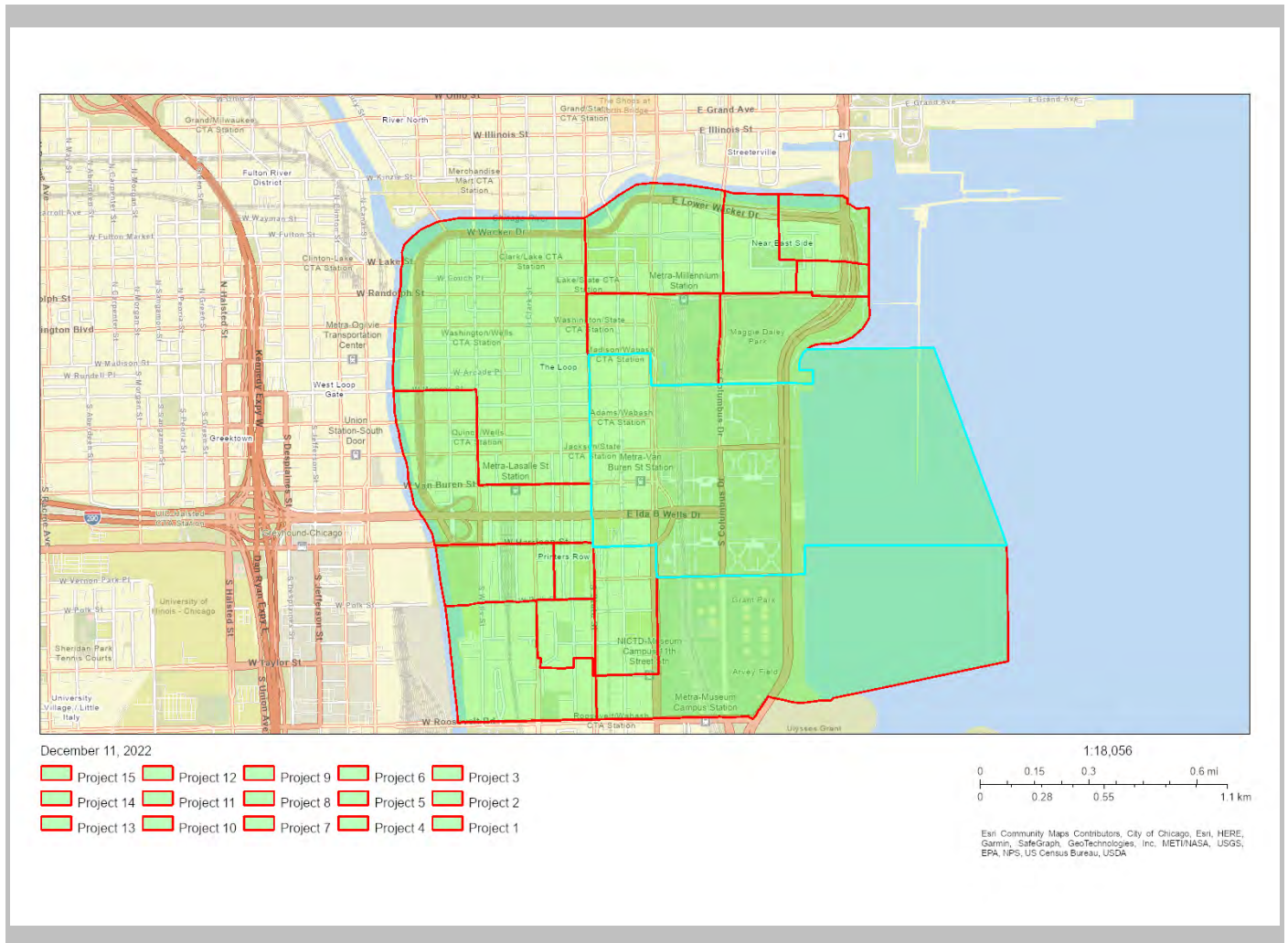
EJScreen Report (Version 2.1)



Blockgroup: 170313204001, ILLINOIS, EPA Region 5

Approximate Population: 3,049

Input Area (sq. miles): 0.56



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1

EJScreen Report (Version 2.1)

Blockgroup: 170313204001, ILLINOIS, EPA Region 5

Approximate Population: 3,049

Input Area (sq. miles): 0.56

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.2	9.92	58	8.67	87
Ozone (ppb)	45.2	45.2	46	42.5	78
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.68	0.396	99	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	6300	760	98	760	98
Lead Paint (% Pre-1960 Housing)	0.36	0.4	41	0.27	63
Superfund Proximity (site count/km distance)	0.044	0.095	44	0.13	40
RMP Facility Proximity (facility count/km distance)	2.7	1.2	88	0.77	94
Hazardous Waste Proximity (facility count/km distance)	22	2.7	99	2.2	99
Underground Storage Tanks (count/km ²)	23	8.6	89	3.9	96
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.13	27	67	12	86
Socioeconomic Indicators					
Demographic Index	23%	34%	43	35%	39
People of Color	38%	39%	58	40%	57
Low Income	8%	27%	14	30%	13
Unemployment Rate	14%	6%	87	5%	89
Limited English Speaking Households	3%	4%	66	5%	67
Less Than High School Education	1%	10%	10	12%	11
Under Age 5	0%	6%	0	6%	0
Over Age 64	9%	16%	20	16%	21

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

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EJScreen Report (Version 2.1)

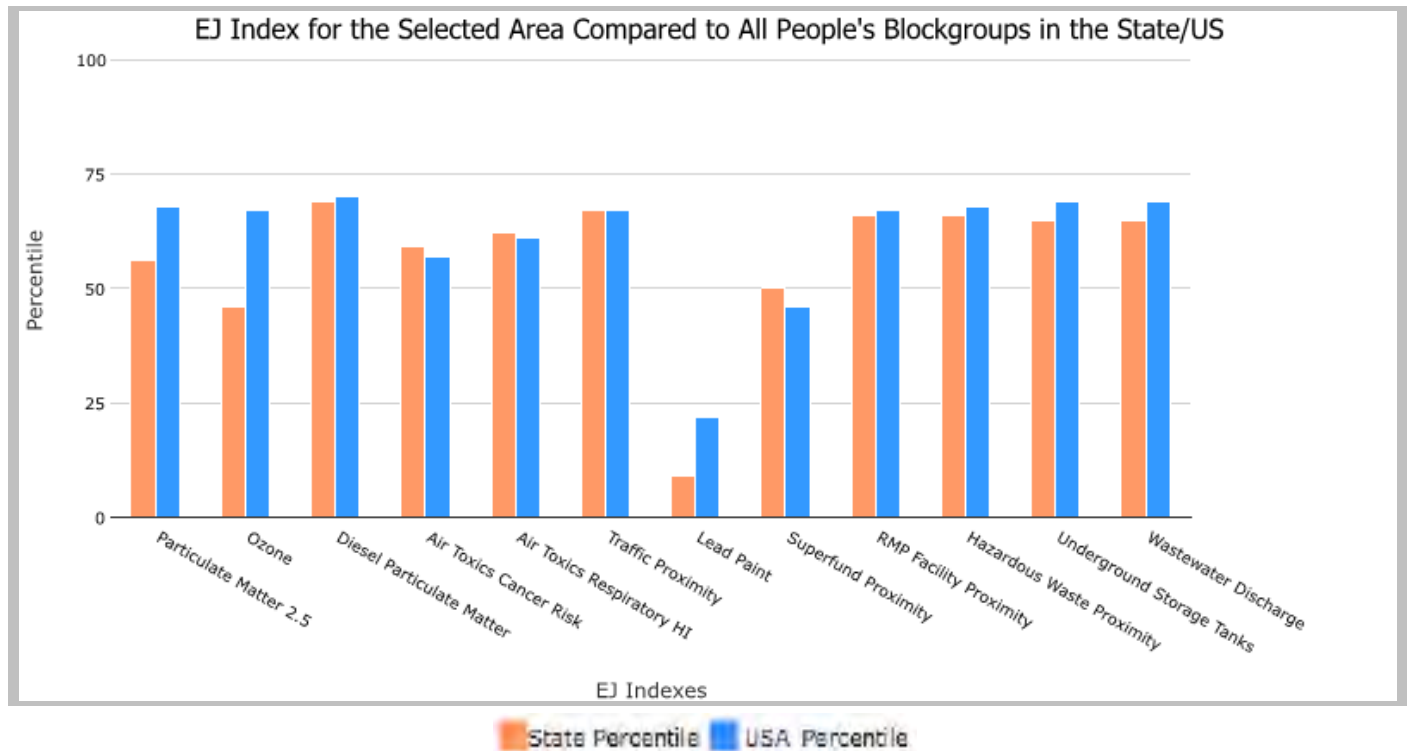


Blockgroup: 170313206001, ILLINOIS, EPA Region 5

Approximate Population: 2,148

Input Area (sq. miles): 0.39

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	56	68
EJ Index for Ozone	46	67
EJ Index for Diesel Particulate Matter*	69	70
EJ Index for Air Toxics Cancer Risk*	59	57
EJ Index for Air Toxics Respiratory HI*	62	61
EJ Index for Traffic Proximity	67	67
EJ Index for Lead Paint	9	22
EJ Index for Superfund Proximity	50	46
EJ Index for RMP Facility Proximity	66	67
EJ Index for Hazardous Waste Proximity	66	68
EJ Index for Underground Storage Tanks	65	69
EJ Index for Wastewater Discharge	65	69



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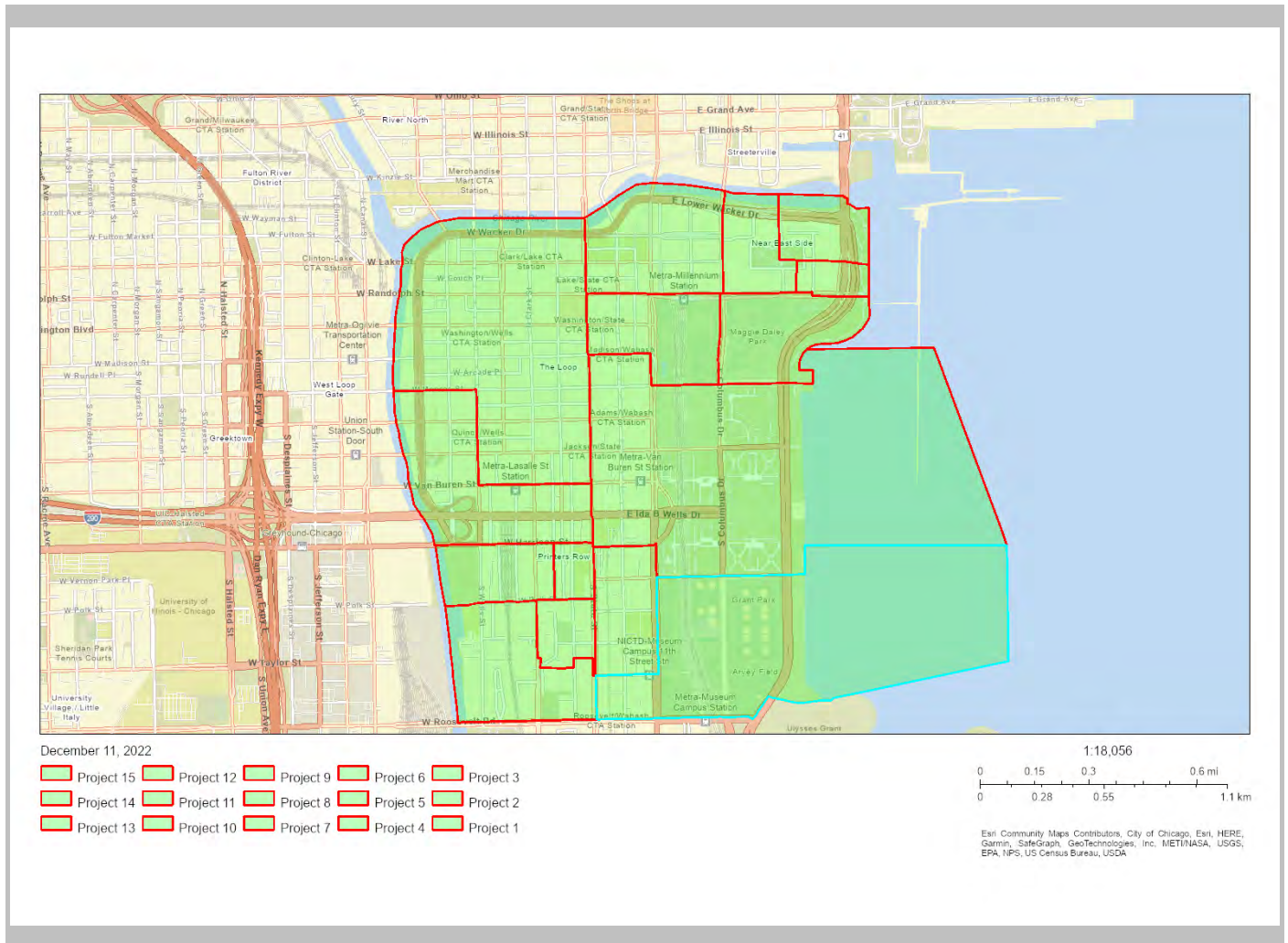
EJScreen Report (Version 2.1)



Blockgroup: 170313206001, ILLINOIS, EPA Region 5

Approximate Population: 2,148

Input Area (sq. miles): 0.39



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

Blockgroup: 170313206001, ILLINOIS, EPA Region 5

Approximate Population: 2,148

Input Area (sq. miles): 0.39

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.3	9.92	60	8.67	88
Ozone (ppb)	45.1	45.2	43	42.5	77
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.63	0.396	99	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	4200	760	96	760	96
Lead Paint (% Pre-1960 Housing)	0.0071	0.4	0	0.27	15
Superfund Proximity (site count/km distance)	0.046	0.095	47	0.13	41
RMP Facility Proximity (facility count/km distance)	2.4	1.2	86	0.77	92
Hazardous Waste Proximity (facility count/km distance)	11	2.7	96	2.2	96
Underground Storage Tanks (count/km ²)	23	8.6	90	3.9	96
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.16	27	69	12	87
Socioeconomic Indicators					
Demographic Index	24%	34%	46	35%	41
People of Color	38%	39%	59	40%	58
Low Income	10%	27%	18	30%	17
Unemployment Rate	5%	6%	57	5%	61
Limited English Speaking Households	3%	4%	68	5%	69
Less Than High School Education	0%	10%	0	12%	0
Under Age 5	7%	6%	65	6%	66
Over Age 64	12%	16%	35	16%	35

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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EJScreen Report (Version 2.1)

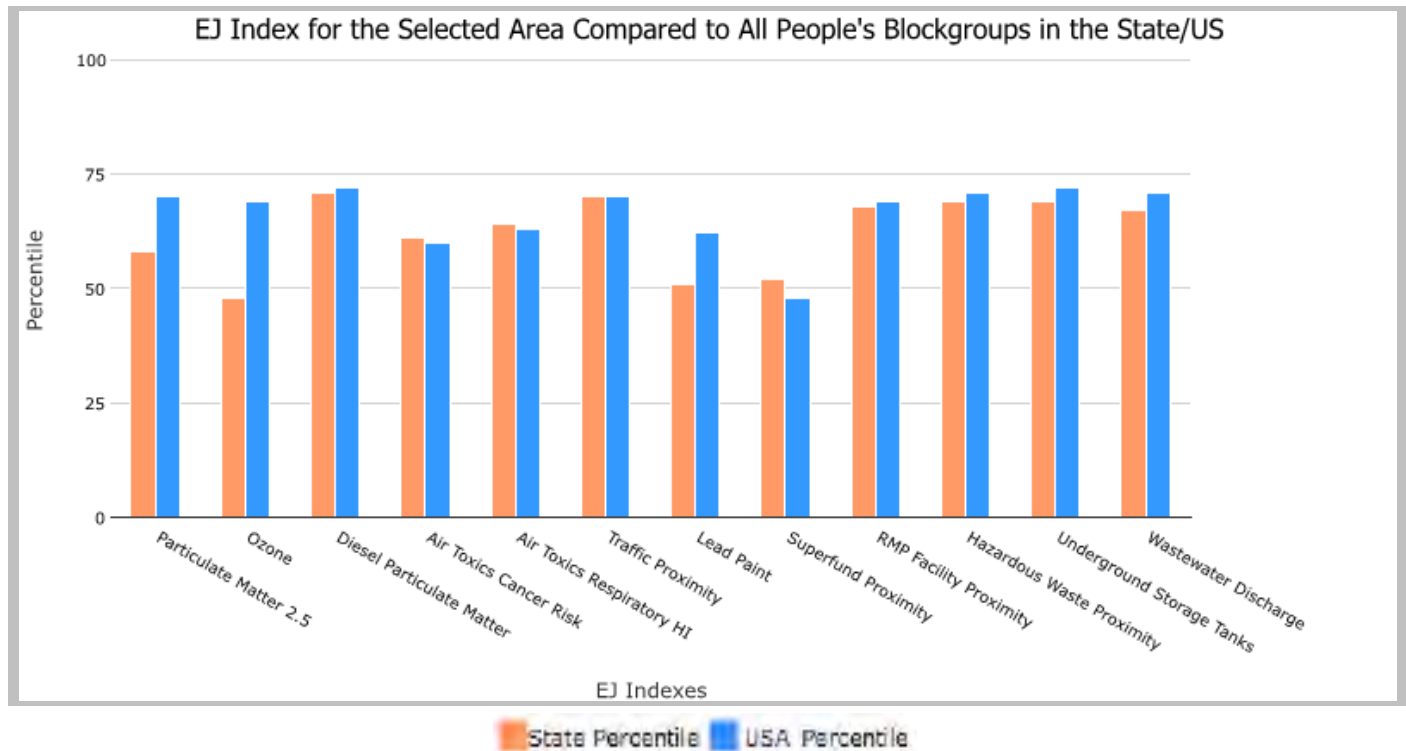


Blockgroup: 170313206002, ILLINOIS, EPA Region 5

Approximate Population: 2,946

Input Area (sq. miles): 0.06

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	58	70
EJ Index for Ozone	48	69
EJ Index for Diesel Particulate Matter*	71	72
EJ Index for Air Toxics Cancer Risk*	61	60
EJ Index for Air Toxics Respiratory HI*	64	63
EJ Index for Traffic Proximity	70	70
EJ Index for Lead Paint	51	62
EJ Index for Superfund Proximity	52	48
EJ Index for RMP Facility Proximity	68	69
EJ Index for Hazardous Waste Proximity	69	71
EJ Index for Underground Storage Tanks	69	72
EJ Index for Wastewater Discharge	67	71



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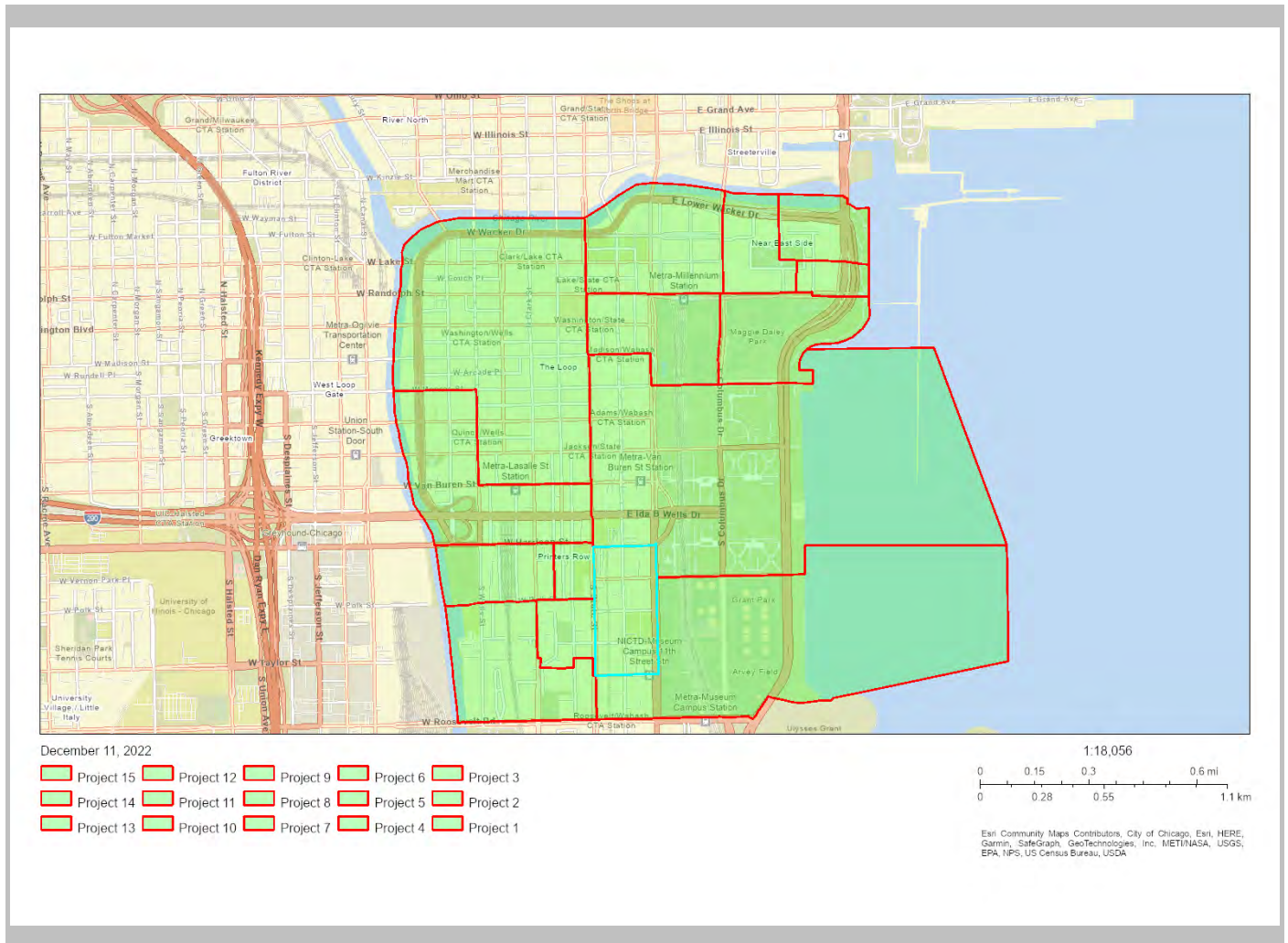
EJScreen Report (Version 2.1)



Blockgroup: 170313206002, ILLINOIS, EPA Region 5

Approximate Population: 2,946

Input Area (sq. miles): 0.06



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

Blockgroup: 170313206002, ILLINOIS, EPA Region 5

Approximate Population: 2,946

Input Area (sq. miles): 0.06



Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.3	9.92	60	8.67	88
Ozone (ppb)	45.1	45.2	43	42.5	77
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.63	0.396	99	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	3900	760	96	760	96
Lead Paint (% Pre-1960 Housing)	0.39	0.4	44	0.27	65
Superfund Proximity (site count/km distance)	0.046	0.095	46	0.13	41
RMP Facility Proximity (facility count/km distance)	2.3	1.2	85	0.77	92
Hazardous Waste Proximity (facility count/km distance)	12	2.7	97	2.2	97
Underground Storage Tanks (count/km ²)	40	8.6	97	3.9	99
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.16	27	69	12	87
Socioeconomic Indicators					
Demographic Index	26%	34%	49	35%	44
People of Color	36%	39%	57	40%	56
Low Income	16%	27%	31	30%	28
Unemployment Rate	6%	6%	58	5%	63
Limited English Speaking Households	4%	4%	70	5%	70
Less Than High School Education	0%	10%	0	12%	0
Under Age 5	5%	6%	44	6%	47
Over Age 64	4%	16%	6	16%	8

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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EJScreen Report (Version 2.1)

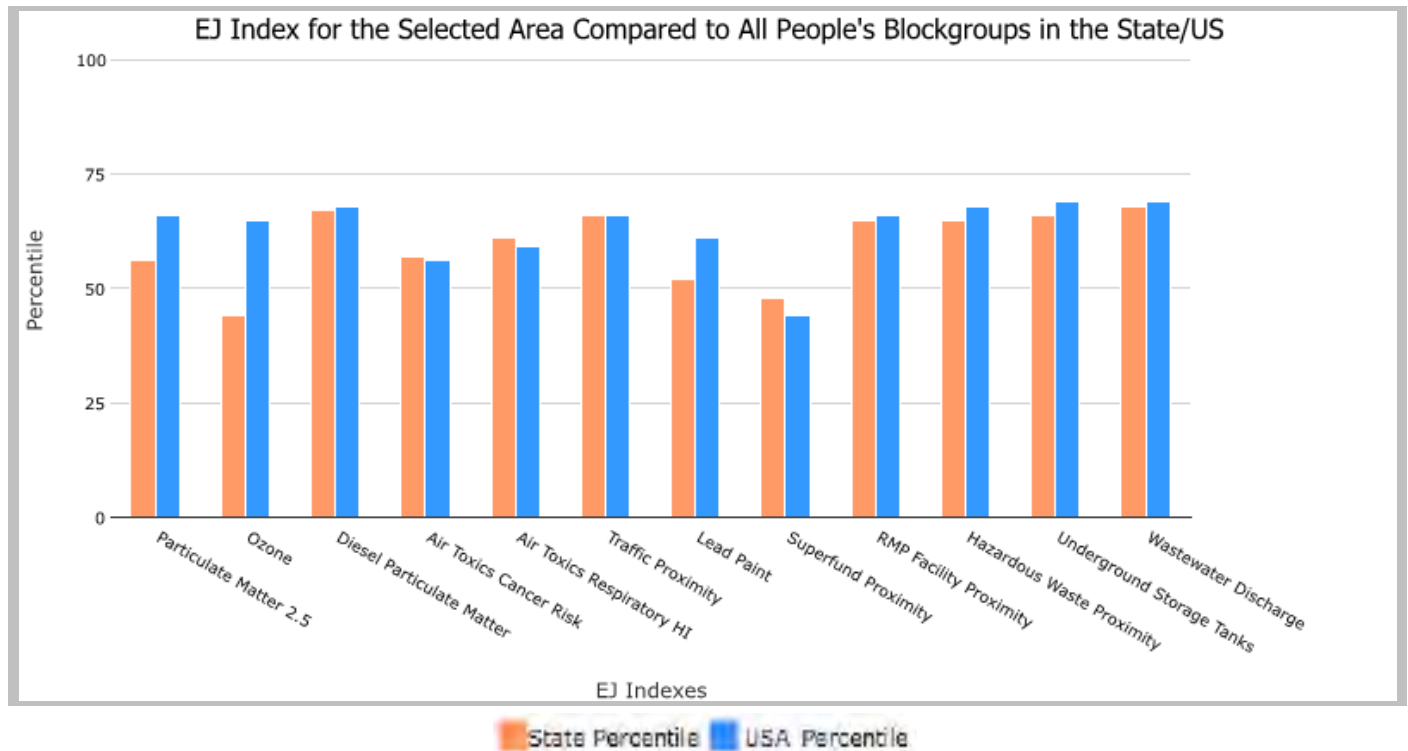


Blockgroup: 170318390001, ILLINOIS, EPA Region 5

Approximate Population: 2,805

Input Area (sq. miles): 0.05

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	56	66
EJ Index for Ozone	44	65
EJ Index for Diesel Particulate Matter*	67	68
EJ Index for Air Toxics Cancer Risk*	57	56
EJ Index for Air Toxics Respiratory HI*	61	59
EJ Index for Traffic Proximity	66	66
EJ Index for Lead Paint	52	61
EJ Index for Superfund Proximity	48	44
EJ Index for RMP Facility Proximity	65	66
EJ Index for Hazardous Waste Proximity	65	68
EJ Index for Underground Storage Tanks	66	69
EJ Index for Wastewater Discharge	68	69



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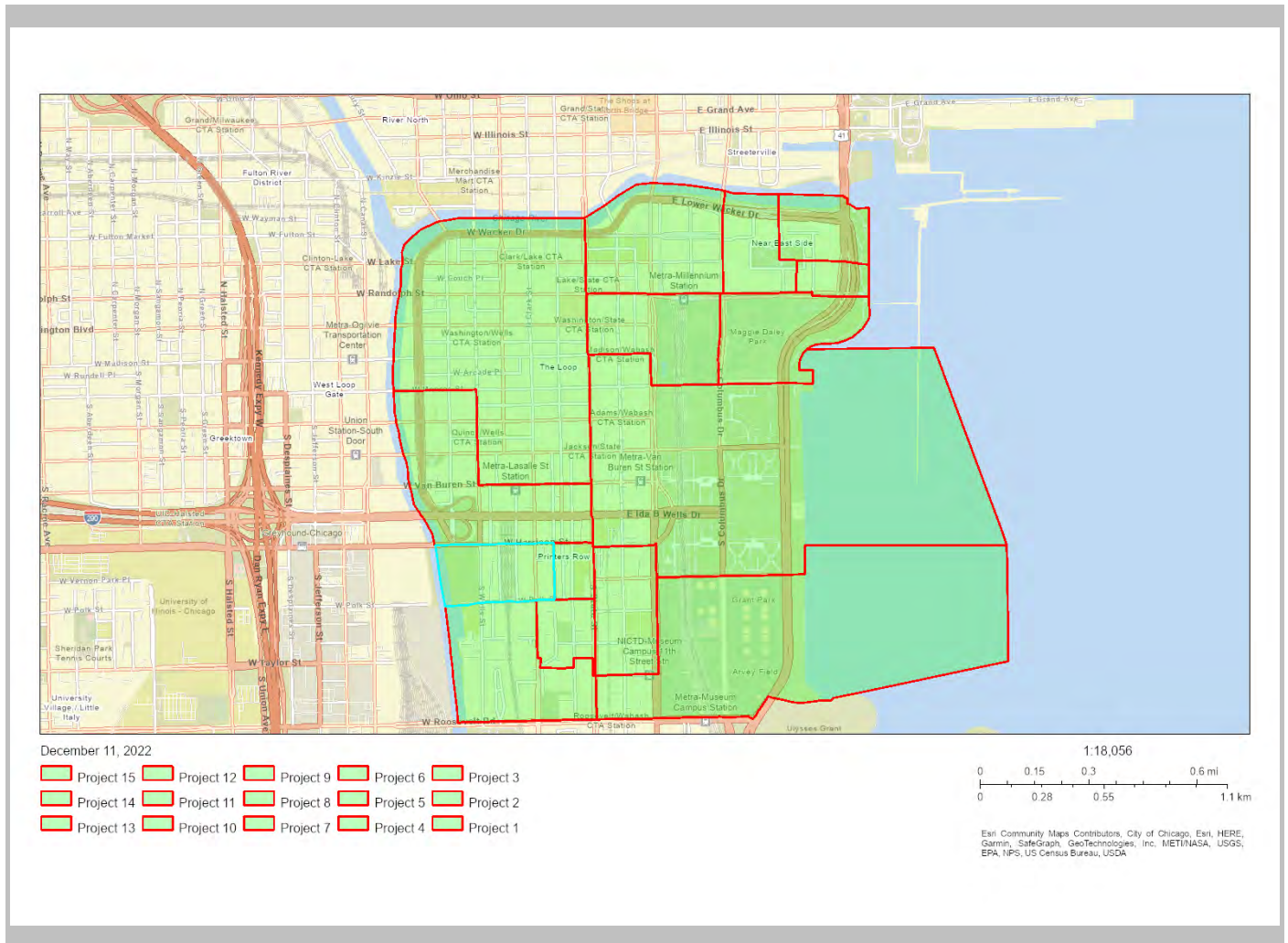
EJScreen Report (Version 2.1)



Blockgroup: 170318390001, ILLINOIS, EPA Region 5

Approximate Population: 2,805

Input Area (sq. miles): 0.05



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

Blockgroup: 170318390001, ILLINOIS, EPA Region 5

Approximate Population: 2,805

Input Area (sq. miles): 0.05



Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.3	9.92	61	8.67	88
Ozone (ppb)	45.1	45.2	43	42.5	77
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.71	0.396	99	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	4900	760	97	760	97
Lead Paint (% Pre-1960 Housing)	0.47	0.4	51	0.27	71
Superfund Proximity (site count/km distance)	0.045	0.095	45	0.13	40
RMP Facility Proximity (facility count/km distance)	2.3	1.2	86	0.77	92
Hazardous Waste Proximity (facility count/km distance)	15	2.7	98	2.2	98
Underground Storage Tanks (count/km ²)	44	8.6	98	3.9	99
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.54	27	80	12	91
Socioeconomic Indicators					
Demographic Index	23%	34%	44	35%	39
People of Color	37%	39%	58	40%	57
Low Income	9%	27%	15	30%	15
Unemployment Rate	3%	6%	34	5%	39
Limited English Speaking Households	0%	4%	0	5%	0
Less Than High School Education	0%	10%	0	12%	0
Under Age 5	8%	6%	77	6%	77
Over Age 64	3%	16%	3	16%	4

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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EJScreen Report (Version 2.1)

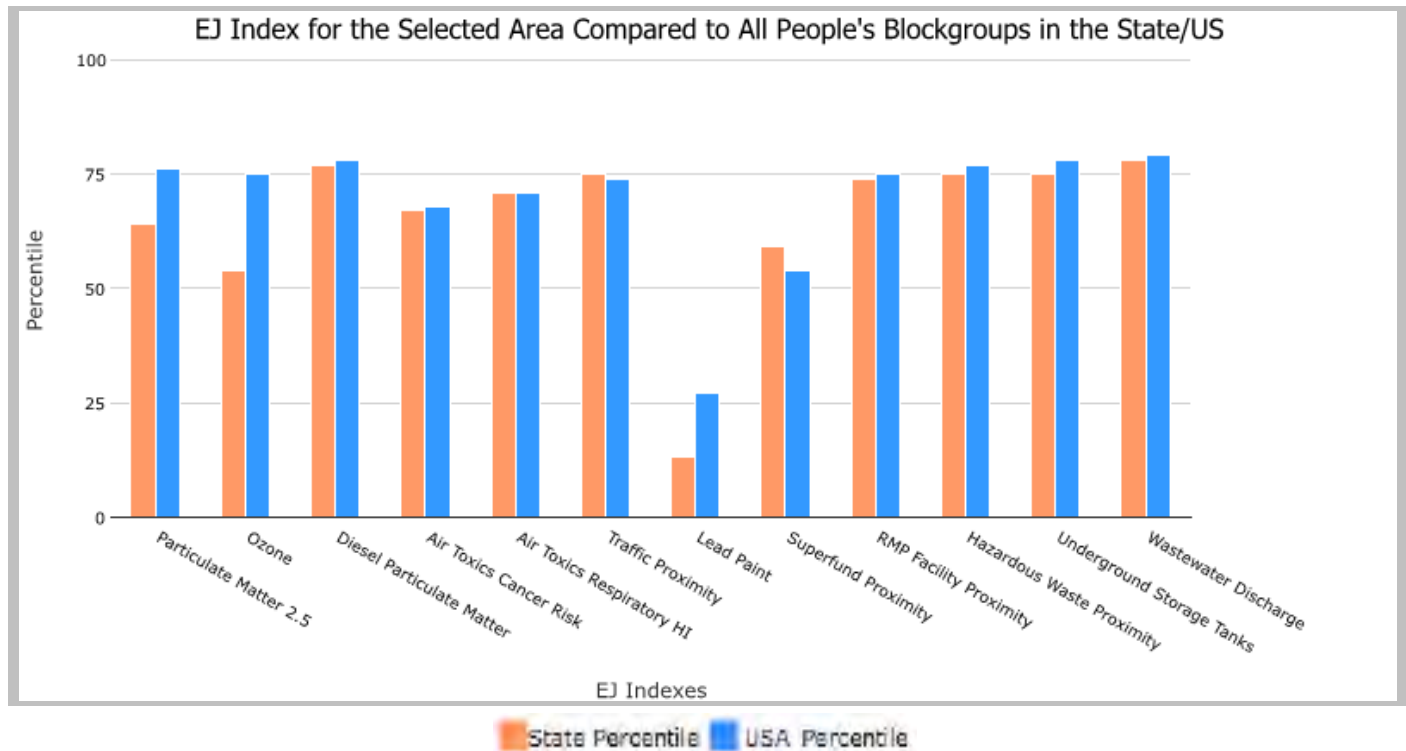


Blockgroup: 170318390002, ILLINOIS, EPA Region 5

Approximate Population: 4,604

Input Area (sq. miles): 0.10

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	64	76
EJ Index for Ozone	54	75
EJ Index for Diesel Particulate Matter*	77	78
EJ Index for Air Toxics Cancer Risk*	67	68
EJ Index for Air Toxics Respiratory HI*	71	71
EJ Index for Traffic Proximity	75	74
EJ Index for Lead Paint	13	27
EJ Index for Superfund Proximity	59	54
EJ Index for RMP Facility Proximity	74	75
EJ Index for Hazardous Waste Proximity	75	77
EJ Index for Underground Storage Tanks	75	78
EJ Index for Wastewater Discharge	78	79



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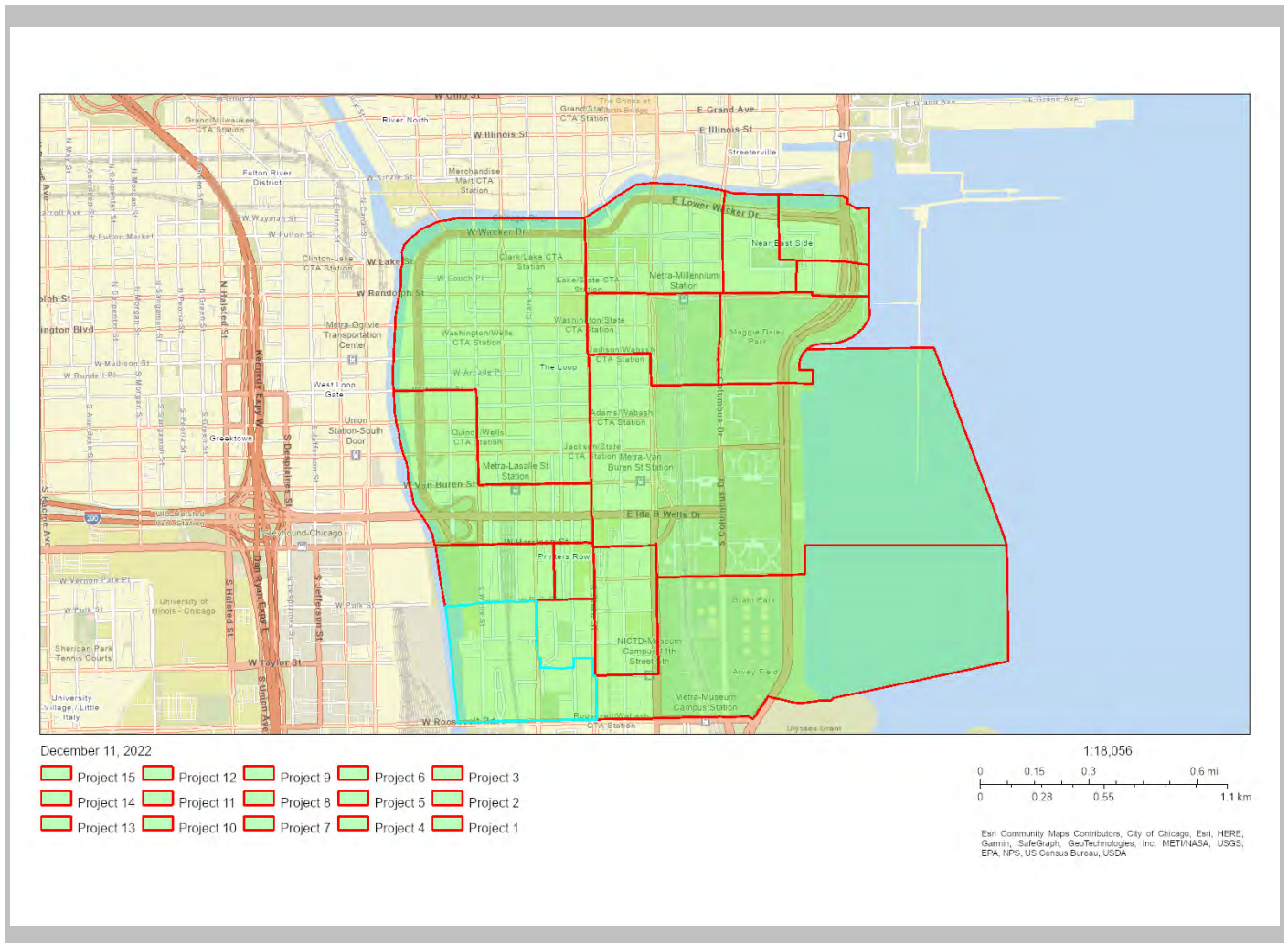
EJScreen Report (Version 2.1)



Blockgroup: 170318390002, ILLINOIS, EPA Region 5

Approximate Population: 4,604

Input Area (sq. miles): 0.10



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

Blockgroup: 170318390002, ILLINOIS, EPA Region 5

Approximate Population: 4,604

Input Area (sq. miles): 0.10



Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.3	9.92	61	8.67	88
Ozone (ppb)	45.1	45.2	43	42.5	77
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.71	0.396	99	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	1900	760	92	760	90
Lead Paint (% Pre-1960 Housing)	0.011	0.4	6	0.27	16
Superfund Proximity (site count/km distance)	0.046	0.095	46	0.13	41
RMP Facility Proximity (facility count/km distance)	2.4	1.2	86	0.77	92
Hazardous Waste Proximity (facility count/km distance)	12	2.7	97	2.2	97
Underground Storage Tanks (count/km ²)	47	8.6	98	3.9	99
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.58	27	81	12	91
Socioeconomic Indicators					
Demographic Index	32%	34%	58	35%	54
People of Color	38%	39%	59	40%	58
Low Income	26%	27%	51	30%	47
Unemployment Rate	11%	6%	82	5%	85
Limited English Speaking Households	2%	4%	62	5%	63
Less Than High School Education	2%	10%	18	12%	18
Under Age 5	0%	6%	0	6%	0
Over Age 64	5%	16%	8	16%	10

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

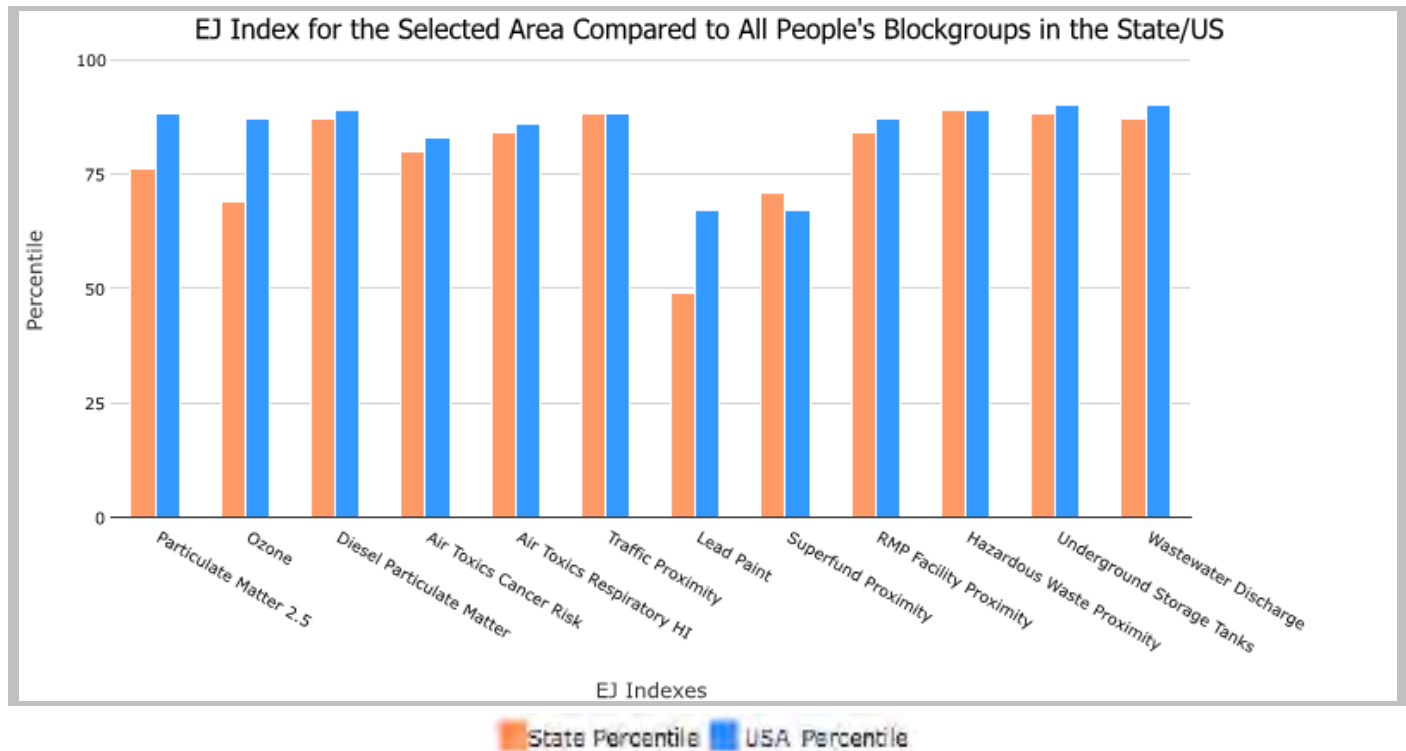
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Blockgroup: 170318390003, ILLINOIS, EPA Region 5

Approximate Population: 915

Input Area (sq. miles): 0.03

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	76	88
EJ Index for Ozone	69	87
EJ Index for Diesel Particulate Matter*	87	89
EJ Index for Air Toxics Cancer Risk*	80	83
EJ Index for Air Toxics Respiratory HI*	84	86
EJ Index for Traffic Proximity	88	88
EJ Index for Lead Paint	49	67
EJ Index for Superfund Proximity	71	67
EJ Index for RMP Facility Proximity	84	87
EJ Index for Hazardous Waste Proximity	89	89
EJ Index for Underground Storage Tanks	88	90
EJ Index for Wastewater Discharge	87	90



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

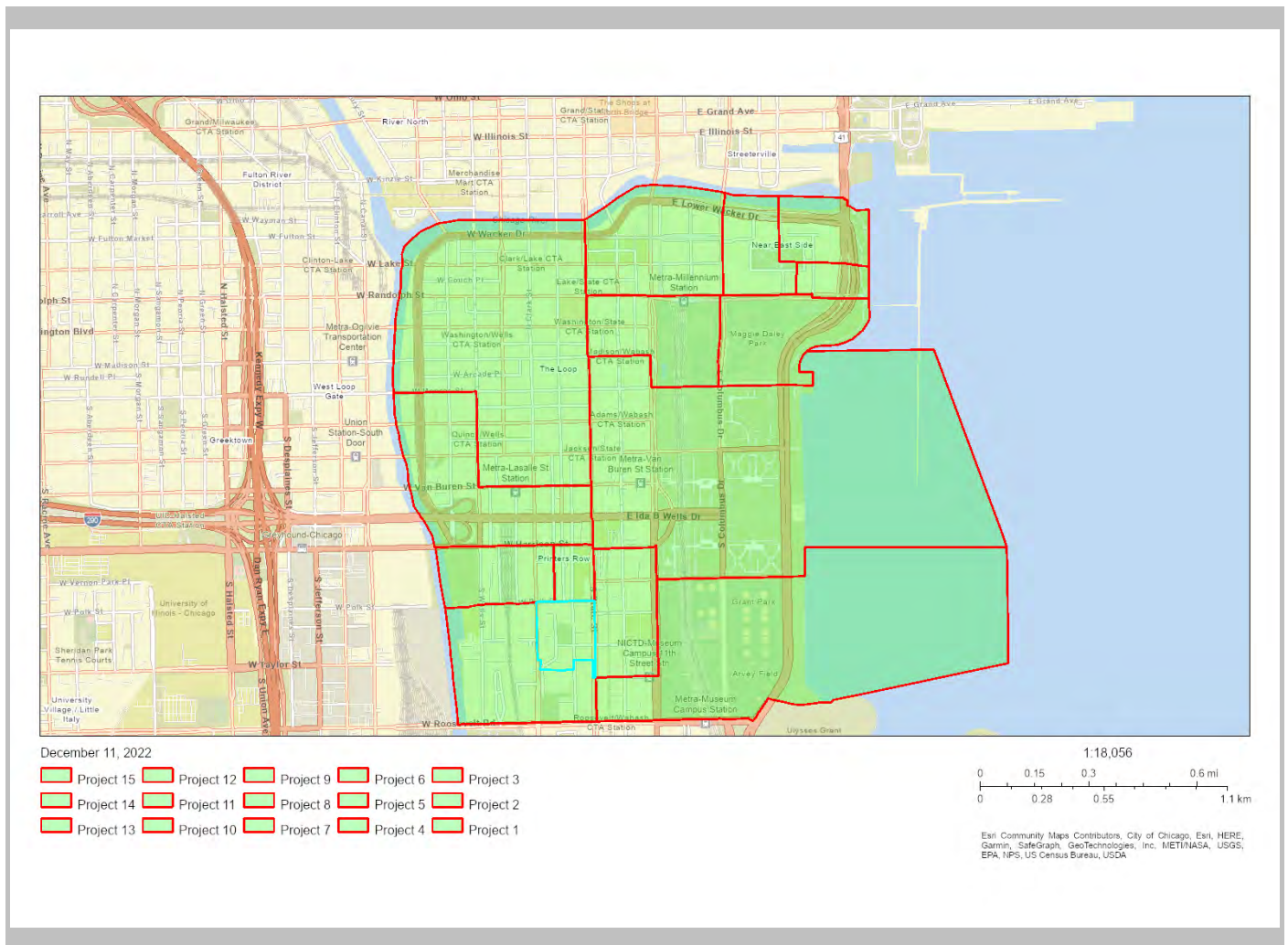
EJScreen Report (Version 2.1)



Blockgroup: 170318390003, ILLINOIS, EPA Region 5

Approximate Population: 915

Input Area (sq. miles): 0.03



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)



Blockgroup: 170318390003, ILLINOIS, EPA Region 5

Approximate Population: 915

Input Area (sq. miles): 0.03

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.3	9.92	61	8.67	88
Ozone (ppb)	45.1	45.2	43	42.5	77
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.71	0.396	99	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	2700	760	94	760	93
Lead Paint (% Pre-1960 Housing)	0.13	0.4	22	0.27	39
Superfund Proximity (site count/km distance)	0.046	0.095	46	0.13	41
RMP Facility Proximity (facility count/km distance)	2.3	1.2	85	0.77	92
Hazardous Waste Proximity (facility count/km distance)	13	2.7	97	2.2	97
Underground Storage Tanks (count/km ²)	44	8.6	98	3.9	99
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.23	27	72	12	88
Socioeconomic Indicators					
Demographic Index	50%	34%	75	35%	74
People of Color	69%	39%	77	40%	78
Low Income	31%	27%	60	30%	56
Unemployment Rate	18%	6%	92	5%	94
Limited English Speaking Households	15%	4%	91	5%	90
Less Than High School Education	7%	10%	49	12%	45
Under Age 5	0%	6%	0	6%	0
Over Age 64	42%	16%	98	16%	96

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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EJScreen Report (Version 2.1)

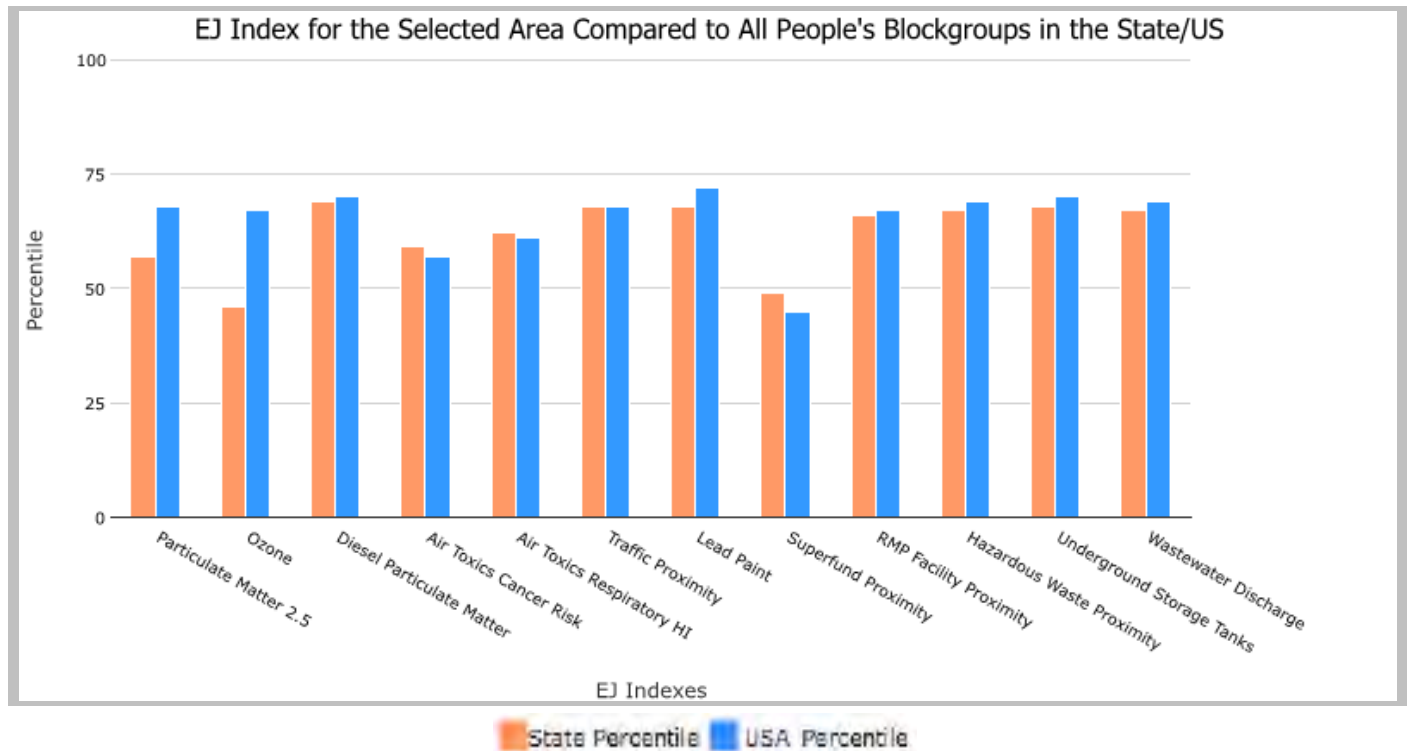


Blockgroup: 170318390004, ILLINOIS, EPA Region 5

Approximate Population: 1,702

Input Area (sq. miles): 0.02

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	57	68
EJ Index for Ozone	46	67
EJ Index for Diesel Particulate Matter*	69	70
EJ Index for Air Toxics Cancer Risk*	59	57
EJ Index for Air Toxics Respiratory HI*	62	61
EJ Index for Traffic Proximity	68	68
EJ Index for Lead Paint	68	72
EJ Index for Superfund Proximity	49	45
EJ Index for RMP Facility Proximity	66	67
EJ Index for Hazardous Waste Proximity	67	69
EJ Index for Underground Storage Tanks	68	70
EJ Index for Wastewater Discharge	67	69



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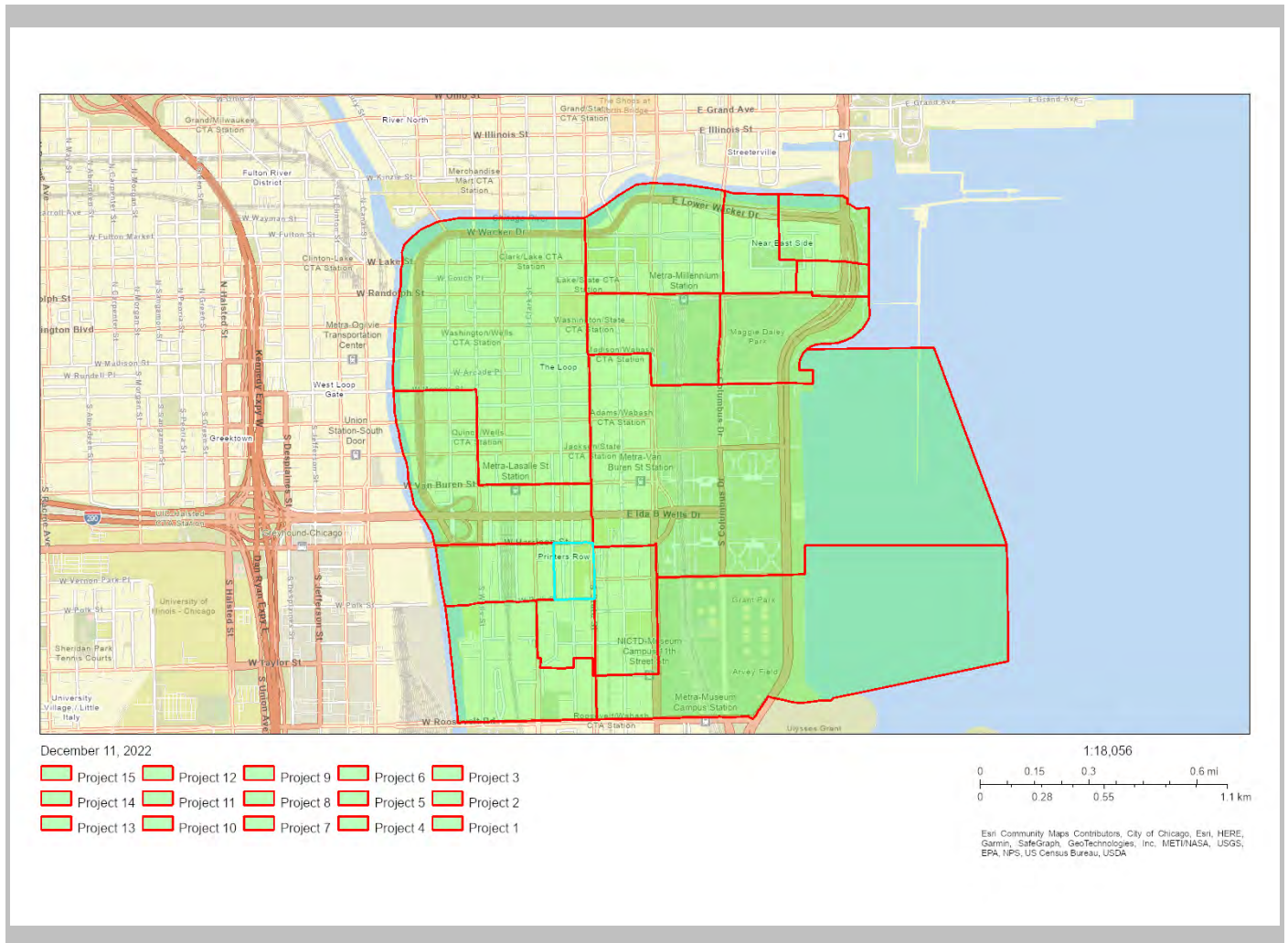
EJScreen Report (Version 2.1)



Blockgroup: 170318390004, ILLINOIS, EPA Region 5

Approximate Population: 1,702

Input Area (sq. miles): 0.02



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)



Blockgroup: 170318390004, ILLINOIS, EPA Region 5
Approximate Population: 1,702
Input Area (sq. miles): 0.02

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.3	9.92	61	8.67	88
Ozone (ppb)	45.1	45.2	43	42.5	77
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.71	0.396	99	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	5600	760	97	760	97
Lead Paint (% Pre-1960 Housing)	0.85	0.4	90	0.27	94
Superfund Proximity (site count/km distance)	0.045	0.095	45	0.13	40
RMP Facility Proximity (facility count/km distance)	2.4	1.2	86	0.77	92
Hazardous Waste Proximity (facility count/km distance)	15	2.7	98	2.2	98
Underground Storage Tanks (count/km ²)	48	8.6	99	3.9	99
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.22	27	72	12	88
Socioeconomic Indicators					
Demographic Index	24%	34%	46	35%	41
People of Color	36%	39%	57	40%	56
Low Income	12%	27%	23	30%	22
Unemployment Rate	8%	6%	71	5%	74
Limited English Speaking Households	0%	4%	0	5%	0
Less Than High School Education	0%	10%	0	12%	0
Under Age 5	9%	6%	79	6%	79
Over Age 64	3%	16%	4	16%	6

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

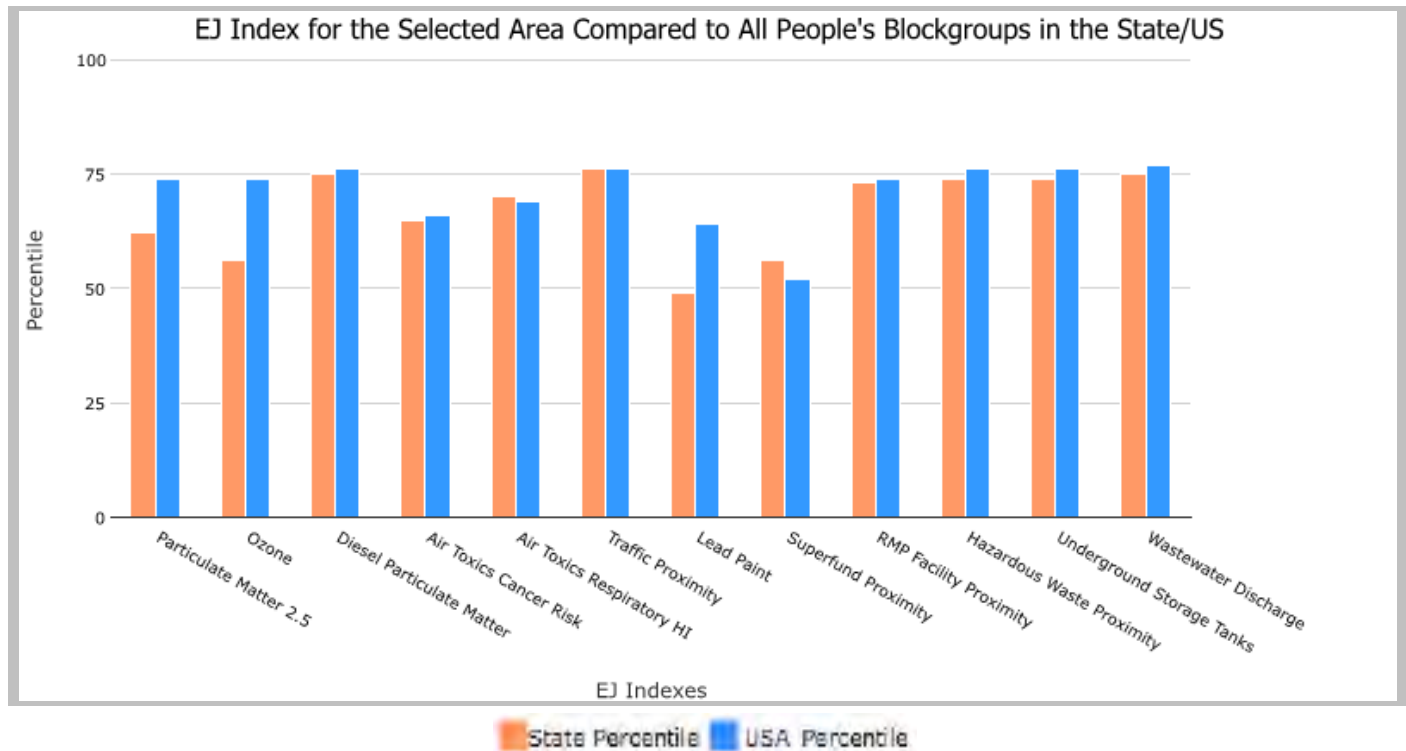
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Blockgroup: 170318391002, ILLINOIS, EPA Region 5

Approximate Population: 2,896

Input Area (sq. miles): 0.13

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	62	74
EJ Index for Ozone	56	74
EJ Index for Diesel Particulate Matter*	75	76
EJ Index for Air Toxics Cancer Risk*	65	66
EJ Index for Air Toxics Respiratory HI*	70	69
EJ Index for Traffic Proximity	76	76
EJ Index for Lead Paint	49	64
EJ Index for Superfund Proximity	56	52
EJ Index for RMP Facility Proximity	73	74
EJ Index for Hazardous Waste Proximity	74	76
EJ Index for Underground Storage Tanks	74	76
EJ Index for Wastewater Discharge	75	77



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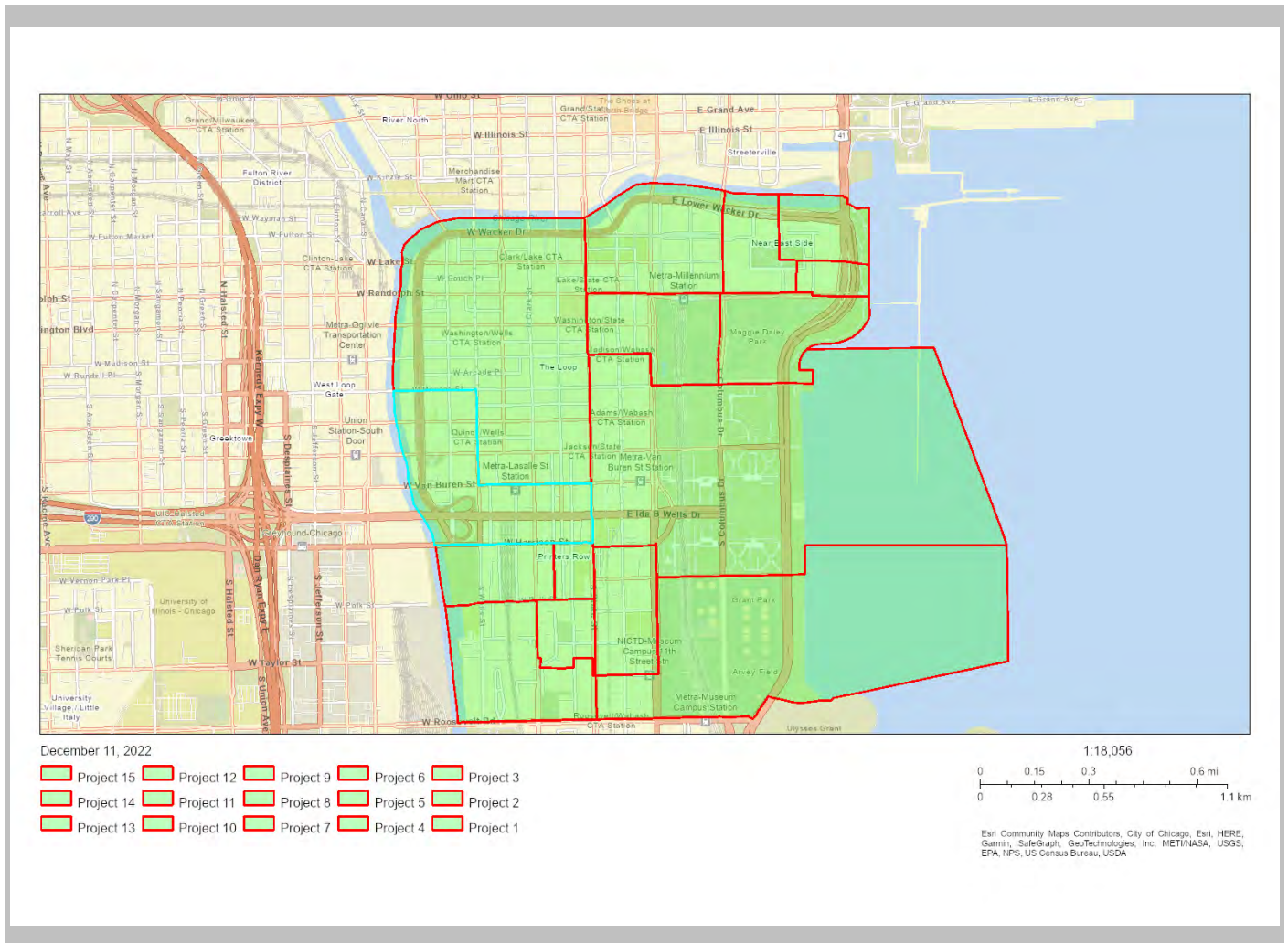
EJScreen Report (Version 2.1)



Blockgroup: 170318391002, ILLINOIS, EPA Region 5

Approximate Population: 2,896

Input Area (sq. miles): 0.13



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

Blockgroup: 170318391002, ILLINOIS, EPA Region 5

Approximate Population: 2,896

Input Area (sq. miles): 0.13



Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.2	9.92	59	8.67	87
Ozone (ppb)	45.2	45.2	47	42.5	78
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.76	0.396	99	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	8900	760	99	760	99
Lead Paint (% Pre-1960 Housing)	0.3	0.4	36	0.27	58
Superfund Proximity (site count/km distance)	0.045	0.095	44	0.13	40
RMP Facility Proximity (facility count/km distance)	2.5	1.2	87	0.77	93
Hazardous Waste Proximity (facility count/km distance)	17	2.7	99	2.2	98
Underground Storage Tanks (count/km ²)	36	8.6	97	3.9	98
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.37	27	77	12	90
Socioeconomic Indicators					
Demographic Index	31%	34%	56	35%	52
People of Color	46%	39%	65	40%	64
Low Income	15%	27%	28	30%	26
Unemployment Rate	2%	6%	24	5%	30
Limited English Speaking Households	0%	4%	0	5%	0
Less Than High School Education	14%	10%	72	12%	68
Under Age 5	0%	6%	0	6%	0
Over Age 64	6%	16%	10	16%	12

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

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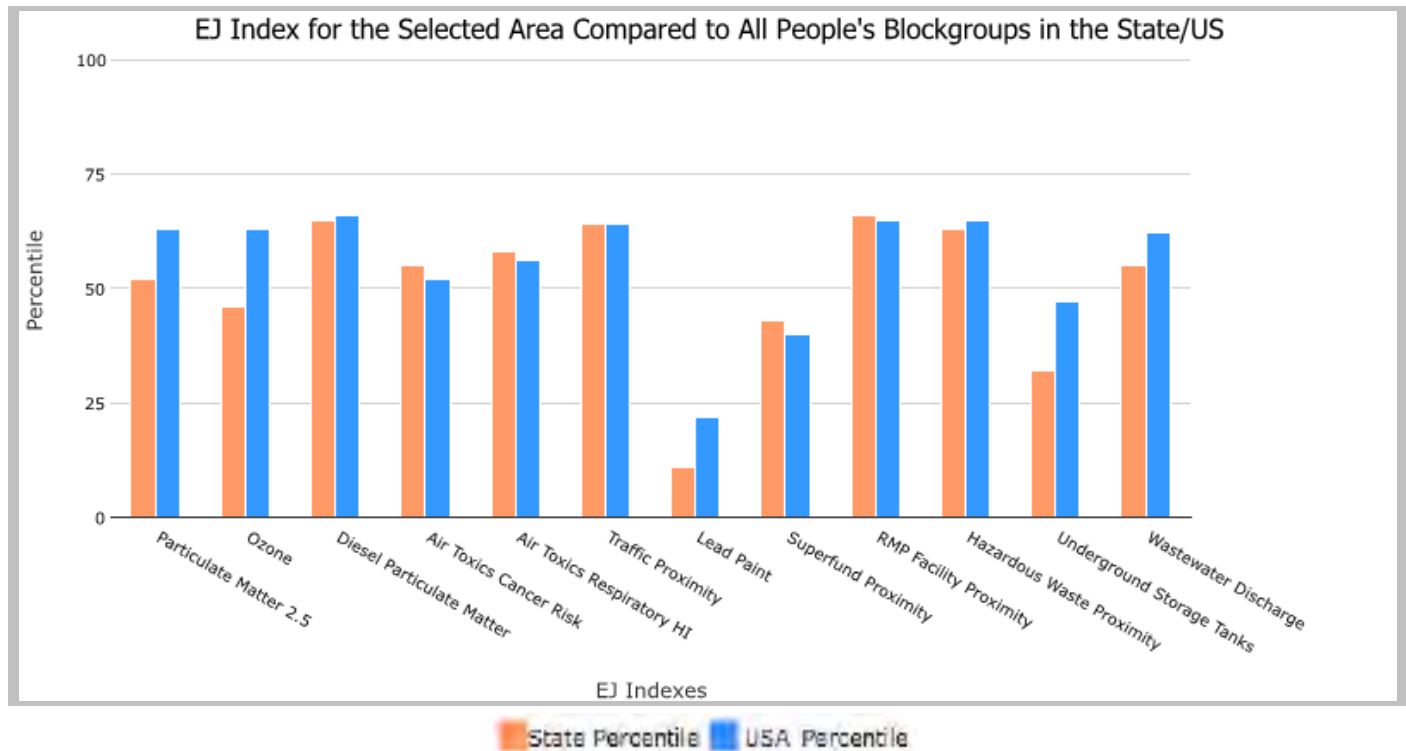
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EJScreen Report (Version 2.1)



Blockgroup: 170313201014, ILLINOIS, EPA Region 5
Approximate Population: 2,306
Input Area (sq. miles): 0.02

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	52	63
EJ Index for Ozone	46	63
EJ Index for Diesel Particulate Matter*	65	66
EJ Index for Air Toxics Cancer Risk*	55	52
EJ Index for Air Toxics Respiratory HI*	58	56
EJ Index for Traffic Proximity	64	64
EJ Index for Lead Paint	11	22
EJ Index for Superfund Proximity	43	40
EJ Index for RMP Facility Proximity	66	65
EJ Index for Hazardous Waste Proximity	63	65
EJ Index for Underground Storage Tanks	32	47
EJ Index for Wastewater Discharge	55	62



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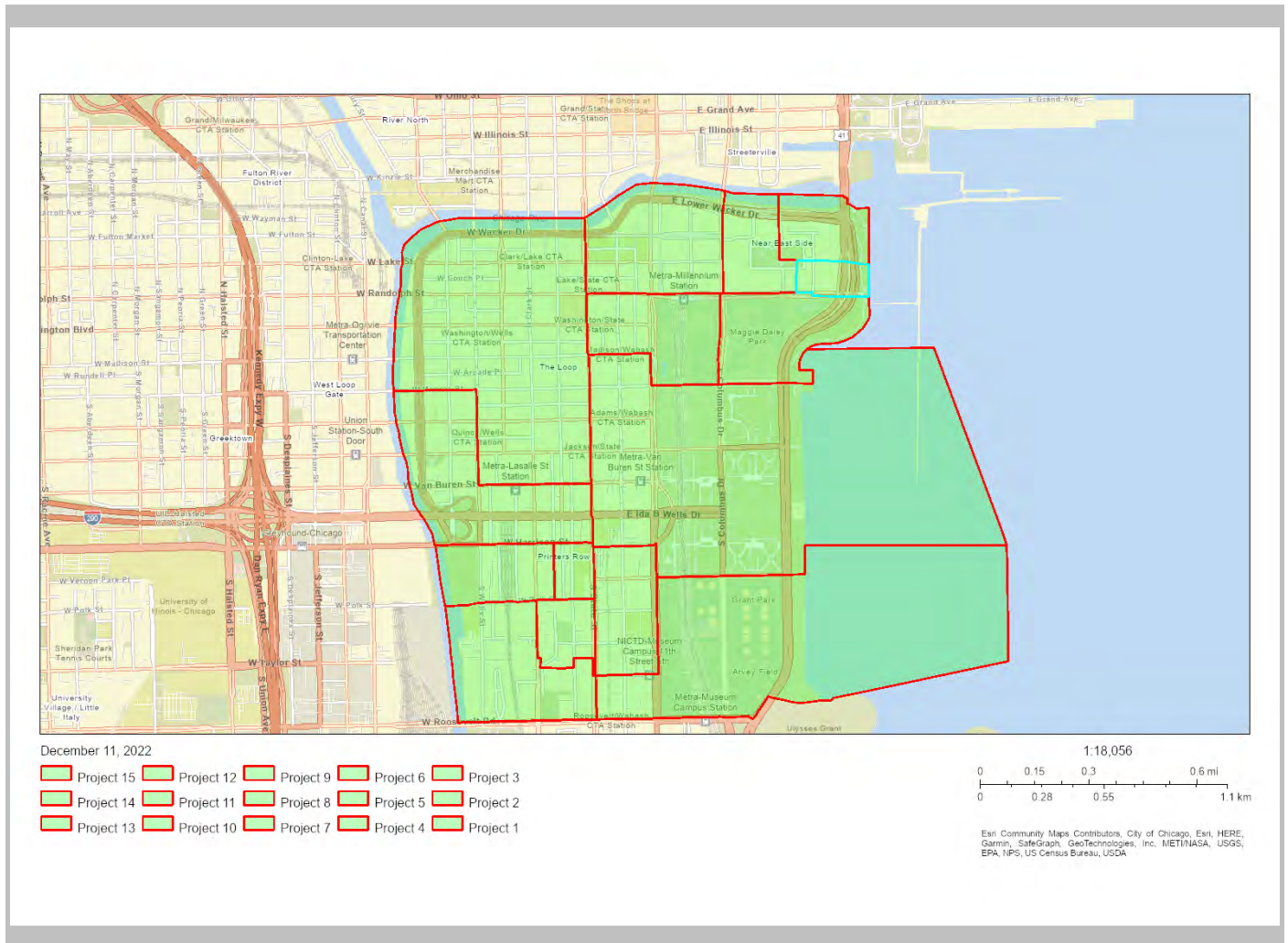
EJScreen Report (Version 2.1)



Blockgroup: 170313201014, ILLINOIS, EPA Region 5

Approximate Population: 2,306

Input Area (sq. miles): 0.02



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

Blockgroup: 170313201014, ILLINOIS, EPA Region 5

Approximate Population: 2,306

Input Area (sq. miles): 0.02



Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	10.2	9.92	57	8.67	87
Ozone (ppb)	45.3	45.2	50	42.5	78
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	1.61	0.396	98	0.294	95-100th
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	98	28	95-100th
Air Toxics Respiratory HI*	0.6	0.37	99	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	9700	760	99	760	99
Lead Paint (% Pre-1960 Housing)	0.021	0.4	8	0.27	18
Superfund Proximity (site count/km distance)	0.043	0.095	43	0.13	39
RMP Facility Proximity (facility count/km distance)	4.5	1.2	96	0.77	98
Hazardous Waste Proximity (facility count/km distance)	16	2.7	98	2.2	98
Underground Storage Tanks (count/km ²)	0.88	8.6	25	3.9	46
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.066	27	59	12	82
Socioeconomic Indicators					
Demographic Index	21%	34%	39	35%	35
People of Color	36%	39%	57	40%	56
Low Income	7%	27%	11	30%	11
Unemployment Rate	2%	6%	29	5%	34
Limited English Speaking Households	0%	4%	0	5%	0
Less Than High School Education	0%	10%	0	12%	0
Under Age 5	4%	6%	35	6%	39
Over Age 64	39%	16%	97	16%	95

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

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1

2

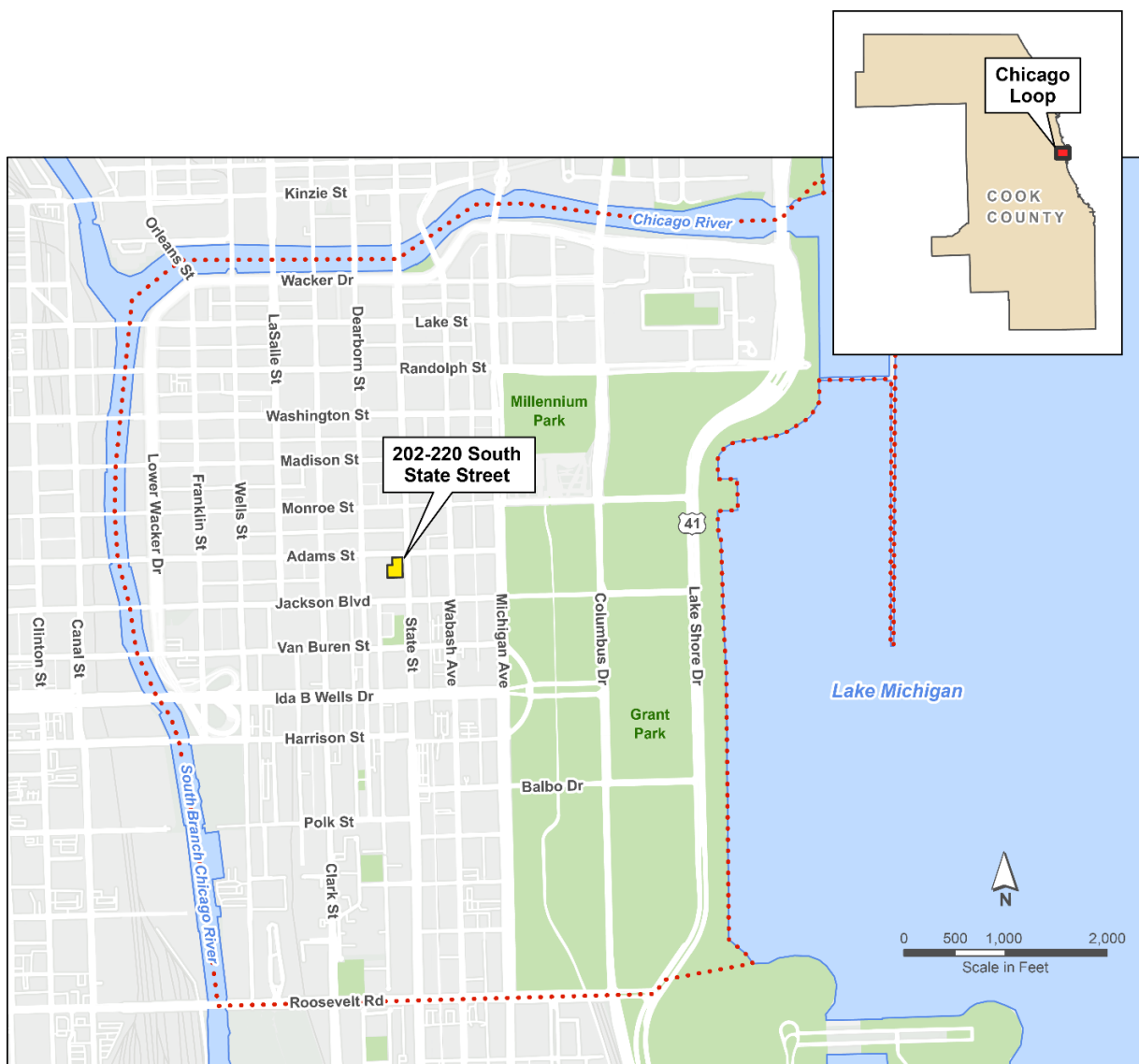
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Socioeconomic and Fiscal Impact Assessment Report

F.1. Introduction

This report describes the socioeconomic conditions in Cook County and the Chicago Loop (refer to Figure F-1 for a location map showing Cook County and the Chicago Loop) and the potential changes that could occur from implementing the alternatives evaluated in the Environmental Impact Statement (EIS) for the Buildings at 202, 214, and 220 South State Street, Chicago, Illinois. The socioeconomic conditions described in this report are related to demographics (population, race/ethnicity, age, educational attainment), employment, housing, income, and taxes. Additionally, since the project is likely to have an impact on opportunities related to heritage tourism in the Chicago area, a brief literature summary of heritage tourism in the local economy is included in the report.

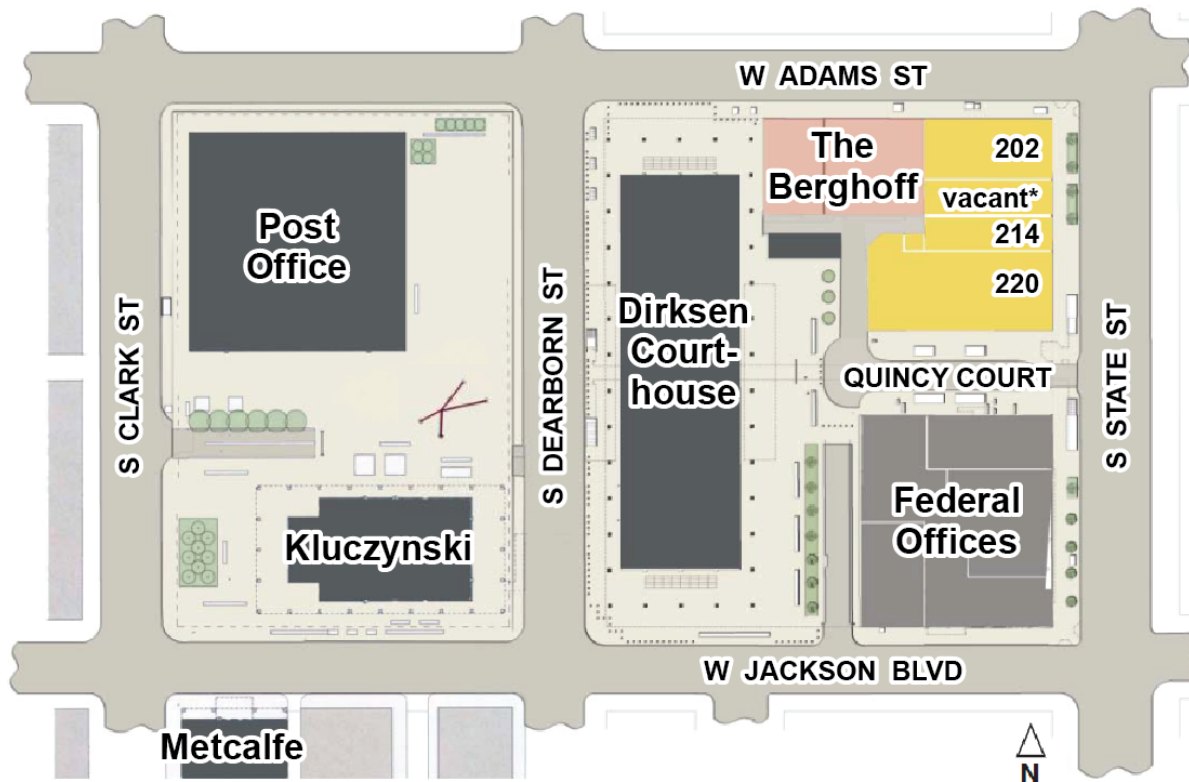
Figure F-1. Location Map



F.2. Project Site

The project site is a half-acre property in the Loop of downtown Chicago, Illinois, which is bounded by State Street on the east, Adams Street on the north, the Everett McKinley Dirksen U.S. Courthouse (Dirksen Courthouse) and The Berghoff restaurant on the west, and Quincy Court on the south (Figure F-2). The federal government owns the entire block, except for two privately owned parcels containing The Berghoff restaurant.

Figure F-2. Project Site



*Former 208-212 South State Street was demolished in Spring 2023.

F.2.1 Project History

In 2005, the U.S. Congress authorized funding for GSA to acquire a 1.3-acre block adjacent to the Dirksen Courthouse, including the four 202-220 South State Street buildings as well as three buildings on the south side of Quincy Court. During the acquisition process, GSA and The Berghoff restaurant developed a memorandum of understanding, which enabled GSA to take ownership of Quincy Court while allowing The Berghoff restaurant to use Quincy Court for its operational needs. The intent of the property acquisition, referred to as the Chicago Federal Campus Expansion Site, was to meet future office space needs of federal agencies, reduce dependence on leasing to meet federal agency space requirements, and increase the security perimeter of the Dirksen Courthouse. GSA completed the property acquisition in 2007.

One of the four buildings, 208-212 South State Street, was demolished between April and June 2023 after an architect-engineer team found that collapsed segments of the first and third floors meant potential imminent structural failure.

F.3. Study Area

For purposes of analyzing the socioeconomic and fiscal impacts associated with the Action Alternatives, Cook County, Illinois is the study area.

F.4. Methods and Assumptions

This section describes the methodology and assumptions used to evaluate the short-term impacts associated with the Action Alternatives including the demolition of the three buildings (Alternative A) and the construction related to the adaptive reuse of the buildings (Alternative B). The long-term impacts associated with operations are described for both the direct and secondary (indirect and induced) impacts. The impacts were evaluated both quantitatively using the IMPLAN model and qualitatively. The qualitative evaluation was primarily related to the importance of heritage tourism in the local economy.

F.4.1 Regional Economic Impacts

Changes in the socioeconomic resources from implementation of the Action Alternatives and long-term impacts associated with operations were evaluated in terms of their direct impact on population, housing, employment (labor force and unemployment rate), income, and overall economic development. The changes in the socioeconomic resources are a direct result of the changes in employment (number of workers during project construction) and income (measured as expenditures during project construction) in the analysis area.

In addition to the direct economic effects, the Action Alternatives may cause secondary (indirect and induced) economic effects. These economic effects include changes in characteristics such as regional employment and income. Secondary employment effects would include indirect employment from the purchase of goods and services by firms involved with the demolition, as well as those involved in the construction related to the adaptive reuse of the buildings, and induced employment because of construction workers spending their income within the analysis area. In addition to these secondary employment impacts, construction would also result in increased indirect and induced incomes. The magnitudes of these economic effects depend on the initial changes in economic activity within the region (such as construction expenditures), the interactions within the regional economy, and the leakage of economic activity from this regional economy to the larger, surrounding economy. Economic linkages create multiplier effects in a regional economy as money is circulated by trade. Economic leakages reduce the multiplier effects in a regional economy.

The IMPLAN model—an economic input-output model commonly used by federal agencies for these types of analyses—was used to estimate the regional economic effects of expenditures for the Action Alternatives. The IMPLAN model package includes county-level data to describe the local economy each year and an online platform that allows users to input more refined and/or accurate input data reflecting the regional economy. Indirect and induced economic effects associated with the alternatives were evaluated using an IMPLAN model of the analysis area and the 2021 IMPLAN Data (IMPLAN Group, 2022).

F.4.2 Population, Housing, Employment, Income, and Taxes

The total (direct plus secondary) employment and income outputs from the IMPLAN model were compared to the analysis area's existing employment and income to determine the changes related to these two indicators under each of the Action Alternatives. Additionally, the changes in employment were used to evaluate any potential impacts to the analysis area's population and housing. Impacts to the fiscal resources were determined qualitatively.

F.4.3 Literature Review

A review of the existing literature as it relates to the economic importance of historic buildings and particularly historic buildings of architectural importance was conducted. A summary of the results of this literature is provided is included in the existing conditions section below.

F.5. Existing Conditions

F.5.1 Demographics

F.5.1.1 General Population Characteristics

As of 2020, 5,275,541 people resided in Cook County and 42,298 people resided in the Chicago Loop. Between 2010 and 2020, the population in the County increased by 1.6 percent, whereas the population in the Chicago Loop increased by 44.4 percent. In 2020, Cook County had 2,086,940 households and the average household size was 2.5. In the same year, the Chicago Loop had 24,134 households and an average household size of 1.6. Table F-1 presents general population characteristics for Cook County and the Chicago Loop.

Table F-1. General Population Characteristics, 2020

Population Characteristic	Cook County	Chicago Loop
Total Population	5,275,541	42,298
Total Households	2,086,940	24,134
Average Household Size	2.5	1.6

Source: CMAP 2022a, 2022b

F.5.1.2 Race and Ethnicity

In 2020, Non-Hispanic Whites comprised the greatest percentage of the total population in Cook County (42 percent) and the Chicago Loop (59.0 percent). Hispanics were the second largest ethnic group in the County (25.3 percent), whereas Non-Hispanic Asians were the second largest group in the Chicago Loop (21.1 percent). There is a much larger percentage of Hispanics and Non-Hispanic African Americans in the County (25.3 percent and 22.9 percent, respectively) than in the Chicago Loop (9.6 percent and 7.1 percent, respectively). Table F-2 breaks down the Cook County and Chicago Loop populations by race or ethnicity.

Table F-2. Race and Ethnicity, 2020

Race and Ethnicity	Cook County Count	Cook County Percent	Chicago Loop Count	Chicago Loop Percent
White (Non-Hispanic)	2,168,964	42.0	23,194	59.0
Hispanic or Latino (of Any Race)	1,308,432	25.3	3,761	9.6
Black (Non-Hispanic)	1,184,373	22.9	2,784	7.1
Asian (Non-Hispanic)	382,075	7.4	8,297	21.1
Other/Multiple Races (Non-Hispanic)	125,673	2.4	1,301	3.3

Source: CMAP 2022a, 2022b

F.5.1.3 Age Characteristics

As indicated in Table F-3, the largest age group in Cook County in 2020 was the 20-to-34-years age group (22.8 percent). The 5-to-9-years age group, 35-to-49-years age group, and 50-to-64-years age group made up a comparable percentage of the total population (18 to 20 percent). The median age was 37.0 years.

In the Chicago Loop, the largest age group was the 20-to-34-years age group (46.8 percent). In general, the population of the Chicago Loop is younger than Cook County as a whole. The second largest age group was the 35-to-49-years age group (20.5 percent). The median age was 32.6.

Table F-3. Age Cohorts, 2020

Age Group	Cook County Count	Cook County Percent	Chicago Loop Count	Chicago Loop Percent
Under 5	315,368	6.1	1,050	2.7
5 to 19	934,763	18.1	3,216	8.2
20 to 34	1,179,280	22.8	18,419	46.8
35 to 49	1,026,034	19.8	8,080	20.5
50 to 64	956,384	18.5	4,386	11.2
65 to 74	433,863	8.4	2,916	7.4
75 to 84	219,634	4.2	953	2.4
85 and Over	104,191	2.0	307	0.8
Median Age	37.0	-	32.6	-

Source: CMAP 2022a, 2022b

F.5.1.4 Educational Attainment

As indicated in Table F-4, individuals with a bachelor's degree make up the greatest percentage of population in Cook County (23.6). Individuals with a high school diploma or equivalent are the second highest percentage (22.6 percent), and individuals with some college, no degree are the third highest percentage (18.4 percent). The population in the Chicago Loop is highly educated compared to the County as a whole; 82.4 percent of the population has a bachelor's degree or higher.

Table F-4. Educational Attainment^[a], 2020

Education Level	Cook County Count	Cook County Percent	Chicago Loop Count	Chicago Loop Percent
Less than High School Diploma	442,048	12.3	1,217	4.0
High School Diploma or Equivalent	811,264	22.6	1,011	3.3
Some College, No Degree	660,139	18.4	2,199	7.2
Associate's Degree	238,063	6.6	959	3.1
Bachelor's Degree	846,361	23.6	11,410	37.2
Graduate or Professional Degree	587,058	16.4	13,853	45.2

Source: CMAP 2022a, 2022b

^[a] Highest degree or level of school completed by an individual.

F.5.2 Economy and Employment

F.5.2.1 Housing

Table F-5 presents the housing type distribution for Cook County. Single Family, Detached is the most common type of housing (40.5 percent). The next most common housing type is 20 or More Units (18.8 percent), which can be attributed to the many multi-unit residential buildings in Chicago area. The majority of homes are less than 3 bedrooms (83.1 percent), as indicated in Table F-6. A large percentage of homes were built between 1940 and 1969 (35.4 percent), as presented in Table F-7. A slightly smaller percentage of homes were built before 1940 (28.3 percent), and 26.3 percent of homes were built between 1970 and 1999. As of December 31, 2022, according to Zillow.com, the median home value in Cook County was \$312,317 (Zillow 2022a).

In the Chicago Loop, 94.7 percent of the housing is 20 or More Units, which can be attributed to the high density, high-rise buildings in the Chicago Loop. The majority of homes are 0 or 1 bedroom (52.9 percent). The housing stock in the Chicago Loop is newer than in Cook County as a whole. The majority of homes were built in 2000 or later (51.5 percent). As of December 31, 2022, according to Zillow.com, the median home value in the Chicago Loop was \$381,775 (Zillow 2022b).

Table F-5. Housing Type, 2020

Housing Type	Cook County Count	Cook County Percent	Chicago Loop Count	Chicago Loop Percent
Single Family, Detached	889,820	40.5	625	2.5
Single Family, Attached	115,249	5.2	290	1.2
2 Units	211,928	9.6	105	0.4
3 or 4 Units	232,291	10.6	48	0.2
5 to 9 Units	216,511	9.8	67	0.3
10 to 19 Units	102,644	4.7	111	0.5
20 or More Units	412,247	18.8	23,271	94.7
Mobile Home/Other*	17,799	0.8	48	0.2

Source: CMAP 2022a, 2022b

Table F-6. Housing Size, 2020

Housing Size	Cook County Count	Cook County Percent	Chicago Loop Count	Chicago Loop Percent
0 or 1 Bedroom	442,645	20.1	13,007	52.9
2 Bedrooms	683,707	31.1	8,716	35.5
3 Bedrooms	701,940	31.9	2,662	10.8
4 Bedrooms	275,143	12.5	136	0.6
5 or More Bedrooms	95,055	4.3	44	0.2
Median Number of Rooms ^[a]	5.2	-	3.6	-

Source: CMAP 2022a, 2022b

^[a] Includes living rooms, dining rooms, kitchens, bedrooms, etc., that are separated by built-in, floor-to-ceiling walls. Excludes bathrooms, porches, balconies, foyers, halls, and unfinished basements.

Table F-7. Housing Age, 2020

Housing Age	Cook County Count	Cook County Percent	Chicago Loop Count	Chicago Loop Percent
Built 2000 or Later	220,573	10.0	12,641	51.5
Built 1970 to 1999	577,412	26.3	5,607	22.8
Built 1940 to 1969	779,026	35.4	1,910	7.8
Built Before 1940	621,478	28.3	4,407	17.9
Median Year Built	1959	-	2001	-

Source: CMAP 2022a, 2022b

F.5.2.2 Employment

As indicated in Table F-8, of the 2,756,348 persons in the labor force in Cook County in 2020, 92.9 percent were employed and 7.0 percent were unemployed. In the Chicago Loop, of the 27,122 persons in the labor force in 2020, 94.2 percent were employed and 5.8 percent were unemployed.

As presented in Table F-9, the Services sector, which accounted for 47 percent of the total industry employment in 2020, is the top industry in Cook County. Within the Services sector, the Arts, Entertainment, and Recreation subsector, which includes tourism, accounted for 1 percent and 4 percent of the total Cook County employment and Services sector employment, respectively. In terms of contribution to the overall Cook County economy, the Services sector is followed by Financial Activities (14 percent) and Government (9.0 percent). The employment in the Construction sector accounts for about 3 percent of the total employment by industry. Table F-9 also summarizes employment by industry for the Chicago Loop using the IMPLAN zip code data. Within the Chicago Loop, employment in the Services sector accounted for 64 percent of the total industry employment in 2020. The Arts, Entertainment, and Recreation subsector of the Services sector accounted 5 percent of the total Chicago Loop employment and 8 percent of the Services sector employment.

Table F-8. Employment Status, 2020

Employment Status	Cook County Count	Cook County Percent	Chicago Loop Count	Chicago Loop Percent
In Labor Force	2,756,348	66.1	2,756,348	66.1
<i>Employed</i> ^[a]	2,560,882	92.9	2,560,882	92.9
<i>Unemployed</i> ^[a]	193,952	7.0	193,952	7.0
Not in Labor Force	1,410,947	33.9	1,410,947	33.9

Source: CMAP 2022a, 2022b

^[a] Does not include employed population in the Armed Forces.**Table F-9. Employment by Industry, 2020**

Industry Sector	Employment (FTE) Cook County	Employment (FTE) Chicago Loop ^[a]
Services	1,443,203 (47.0%)	234,278 (63.6%)
<i>Arts, entertainment, and recreation</i>	57,632 (1.9%)	19,367 (5.3%)
<i>All other Services</i>	1,383,789 (45.0%)	214,911 (58.4%)
Financial Activities ^[b]	430,396 (14.0%)	88,224 (24.0%)
Government	263,845 (8.6%)	3,321 (0.9%)
Transportation, Warehousing, and Utilities	240,092 (7.8%)	2,353 (0.6%)
Retail Trade	222,647 (7.2%)	5,866 (1.6%)
Manufacturing	180,889 (5.9%)	2,513 (0.7%)
Construction	117,217 (3.8%)	6,675 (1.8%)
Wholesale Trade	111,102 (3.6%)	7,179 (2.0%)
Information	60,102 (2.0%)	17,684 (4.8%)
Mining, quarrying, and oil and gas extraction	1,619 (0.1%)	25 (<0.0%)
Agriculture	727 (<0.0%)	16 (<0.0%)

Industry Sector	Employment (FTE) Cook County	Employment (FTE) Chicago Loop ^[a]
Total Employment	3,071,839	368,134

Source: BEA 2023a; IMPLAN 2022

^[a] Estimates out of IMPLAN zip code data for the six zip codes (60601 through 60606) representing the Chicago Loop.

^[b] Financial Activities sector includes (1) finance and insurance, and (2) real estate and rental and leasing.

F.5.2.3 Income

As indicated in Table F-10, 19.2 percent of the population in Cook County has a household income of less than \$25,000, whereas 17.9 percent (the third highest group) has a household income of \$150,000 or more. Median household income in Cook County is \$67,886, and per capita income is \$39,239. About 14 percent of the population in Cook County lives in poverty (U.S. Census Bureau 2020).

The majority of the population in the Chicago Loop (57.6 percent) has a household income of \$100,000 or more. Median household income in the Chicago Loop is \$113,599 and the per capita income is \$90,269. About 8 percent of the population in the Chicago Loop lives in poverty (U.S. Census Bureau 2020).

Table F-10. Income, 2020

Income	Cook County Count	Cook County Percent	Chicago Loop Count	Chicago Loop Percent
Household Income Less than \$25,000	382,543	19.2	1,759	8.4
Household Income \$25,000 to \$49,999	374,751	18.8	2,237	10.7
Household Income \$50,000 to \$74,999	316,827	15.9	2,173	10.4
Household Income \$75,000 to \$99,999	244,249	12.3	2,737	13.1
Household Income \$100,000 to \$149,999	315,926	15.9	4,603	22.0
Household Income \$150,000 and Over	357,178	17.9	7,458	35.6
Median Household Income	\$67,886	-	\$113,599	-
Per Capita Income	\$39,239	-	\$90,269	-

Source: CMAP 2022a, 2022b

Table F-11 summarizes the earnings by industry for Cook County in 2020. The Services sector, which accounted for 44 percent of the total industry earnings in 2020, is the top industry in the County. Within the Services sector, the Arts, Entertainment, and Recreation subsector, which includes tourism, accounted for 1 percent and 2 percent of the total Cook County industry earnings and Services sector earnings, respectively. In terms of contribution to the overall Cook County economy, the Financial Activities (15 percent) and Government (12 percent) are the second and third most important sectors, after the Services sector. The earnings in the Construction sector accounts for about 3 percent of the total industry earnings.

Table F-11 also summarizes the industry earnings for the Chicago Loop using the IMPLAN zip code data. Within the Chicago Loop, earnings in the Services sector accounted for 53 percent of the total industry earnings in 2020. The Arts, Entertainment, and Recreation subsector of the Services sector accounted for 2 percent of the total Chicago Loop industry earnings and 4 percent of the Services sector industry earnings.

Table F-11. Earnings by Industry, 2020

Industry Sector	Earnings in Millions \$ Cook County	Earnings in Millions \$ Chicago Loop ^[a]
Services	\$119,797 (44.4%)	\$27,841 (52.6%)
<i>Arts, entertainment, and recreation</i>	\$2,952 (1.1%)	\$1,148 (2.2%)
<i>All other Services</i>	\$116,845 (43.3%)	\$26,693 (50.5%)
Financial Activities ^[b]	\$41,058 (15.2%)	\$19,405 (36.7%)
Government	\$31,755 (11.8%)	\$389 (0.7%)
Transportation, Warehousing, and Utilities	\$15,874 (5.9%)	\$285 (0.5%)
Retail Trade	\$10,887 (4.0%)	\$306 (0.6%)
Manufacturing	\$17,957 (6.7%)	\$182 (0.3%)
Construction	\$8,891 (3.3%)	\$593 (1.1%)
Wholesale Trade	\$13,414 (5.0%)	\$882 (1.7%)
Information	\$10,023 (3.7%)	\$3,013 (5.7%)
Mining, quarrying, and oil and gas extraction	\$236 (0.1%)	\$3 (<0.0%)
Agriculture	\$43 (<0.0%)	\$1 (<0.0%)
Total Earnings	\$269,936	\$52,900.8

Source: BEA 2023b; IMPLAN 2022

^[a] Estimates out of IMPLAN zip code data for the six zip codes (60601 through 60606) representing the Chicago Loop.

^[b] Financial Activities sector includes (1) finance and insurance, and (2) real estate and rental and leasing.

F.5.2.4 Taxes

Cook County generates revenue from a variety of sources, including sales and property taxes. Cook County consists of 130 municipalities. Property tax rates vary based on the taxing districts (e.g., school districts, park districts, and municipalities) that provide services and are authorized to levy taxes on property within their geographic boundaries to pay for those services (Cook County n.d.). As indicated in Table F-12, in 2021, the average tax rate for sample residential property in the City of Chicago was 6.697 percent. In the north and northwest suburbs, the average 2021 tax rate for sample residential property was 9.938 percent, while in the south and west suburbs, it was 13.068 percent. The average 2021 tax rate for sample commercial property was the same as for sample residential property.

Table F-12. Average Property Tax Rates for Sample Properties, 2021

Sample Properties	Average Tax Rate Residential	Average Tax Rate Commercial
City of Chicago – North	6.697%	6.697%
City of Chicago – Central	6.697%	6.697%
City of Chicago – South	6.697%	6.697%
North & Northwest Suburbs	9.938%	9.938%
South and West Suburbs	13.068%	13.068%

Source: Office of the Cook County Clerk 2022

Similar to property tax, sales tax varies depending on location. The Cook County tax rate is 1.75 percent and is combined with state and city sales tax rates. In the City of Chicago, for example, the total sales tax rate is 10.25 percent, which accounts for the State of Illinois (6.25 percent), Cook County (1.75 percent), City of Chicago (1.25 percent), and Regional Transportation Authority (1 percent) tax rates (Avalara 2023).

F.5.2.5 Heritage Tourism

Historic preservation benefits communities for many reasons, including heritage tourism. The National Trust for Historic Preservation defines heritage tourism as “traveling to experience the places, artifacts, and activities that authentically represent the stories and people of the past and present” (Advisory Council on Historic Preservation n.d.).

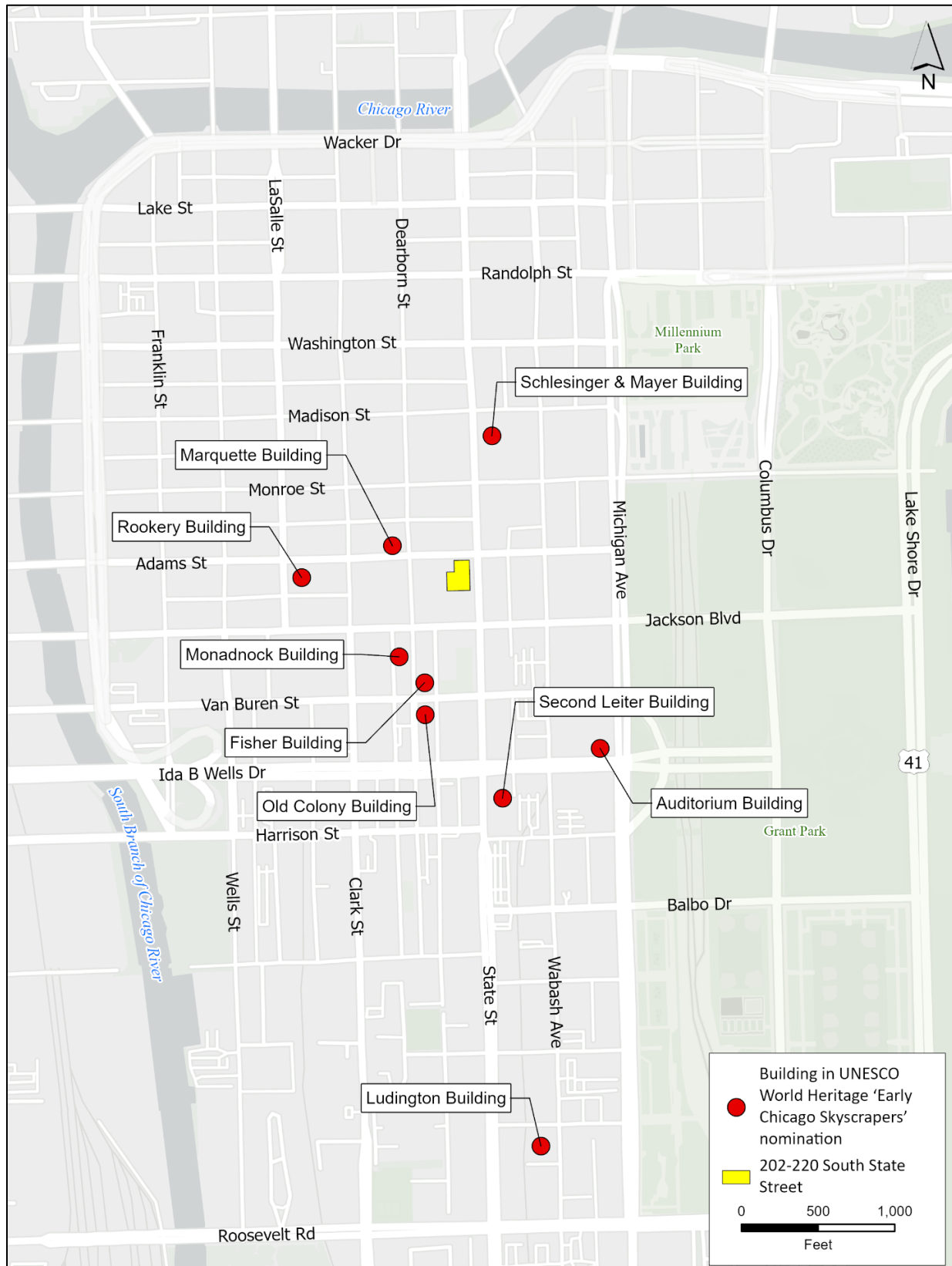
In the U.S., 78 percent of all leisure travelers participate in cultural and/or heritage activities while traveling, equating to about 118.3 million adults each year. With cultural and heritage travelers spending an average of \$994 per trip, they contribute more than \$192 billion annually to the national economy (McCormick 2010).

Heritage visitors stay longer, visit more places, and spend more money per day than do tourists with no interest in historic resources. In New York City, for example, which is similar to Chicago in size and its world-class cultural attractions, 31% of domestic tourists who visit New York City for a single day are in the “heritage visitor” category. The share is even larger for overnight visitors, with 40% putting a high priority on visiting historic places. This represents direct spending of more than \$8 billion each year in New York City. Over 134,000 jobs in New York City are related to the heritage tourism industry. These heritage tourism jobs result in nearly \$6 billion in direct wages to New York City residents and \$738 million in local tax revenue. Each heritage visitor in New York City spends on average \$83 more during the trip than the non-heritage tourist (PlaceEconomics n.d.).

Chicago's historic architecture is an important driver in the City's economy. For example, the Chicago Architecture Center has 85 different tours offered nearly 7,000 times per year including via boat, walking, bus, and "L" train (Chicago Architecture Center n.d.). These tours brought in \$15.6 million in revenue in 2016 (Mensik 2018); this is compared to \$12.1 million in 2014, a nearly 29 percent increase (Mensik 2018).

Chicago's early skyscrapers have been nominated for a UNESCO World Heritage Site, and concerns about this project's effect on that designation were raised during public scoping meetings. The proposal, submitted in December 2017 by the U.S. Department of the Interior, includes nine primarily commercial buildings in the Chicago Loop constructed over a period of about 20 years starting in the 1880s. These nine buildings exemplify the first generation of skyscrapers and used new technologies of the time, particularly internal metal structural systems instead of load-bearing masonry walls. The buildings rose to heights of near 20 stories, with large plate-glass windows, the first elevators to reach the high floors, and electric lights to make interior spaces usable (UNESCO 2017). Although the three buildings at 202, 214, and 220 South State Street are not among the nine buildings in the proposal, the Century and Consumers buildings (202 and 220 South State Street) are two examples of Chicago's early skyscrapers and are within four blocks of eight of the nine buildings in the proposal (refer to Figure F-3). A UNESCO World Heritage Site designation could increase heritage tourism in Chicago.

Figure F-3. Buildings in UNESCO World Heritage Site Nomination



F.6. Environmental Consequences

F.6.1 No Action Alternative

Under the No Action Alternative, GSA would continue to monitor the buildings' condition and secure the buildings. The buildings would remain in place, vacant, and in need of significant repairs. Maintenance costs would likely become increasingly expensive as the buildings sit vacant and continue to deteriorate; however, the increase would be nominal. Therefore, the fiscal conditions would remain the same and there would be no impacts to socioeconomics.

While the individual contribution of the buildings at 202, 214, and 220 South State Street to Chicago's heritage tourism is unknown, the No Action Alternative would preserve these examples of Chicago's architectural history, which draws visitors to Chicago and benefits the economy. There would likely be no effect on the heritage tourism industry.

F.6.2 Alternative A, Demolition

F.6.2.1 Short-term Impacts

Alternative A would involve the demolition of 202, 214, and 220 South State Street in accordance with the 2022 Consolidated Appropriations Act. The congressional funds appropriated to GSA are available only for demolition, protecting adjacent buildings, securing the site, and landscaping the vacant site following demolition.

The cost to demolish the three buildings is \$48.8 million and demolition is estimated to take up to 2 years to complete. Because demolition of older buildings is assumed to be performed by specialized companies that can handle any hazardous or contaminated materials, including the hauling and disposal of such materials, only 80 percent of the total cost is assumed to be spent within the study area (i.e., Cook County), while the remaining 20 percent is assumed to be spent outside the study area. Additionally, demolishing older buildings is expected to have more expenditures associated with the handling of potentially hazardous materials and higher labor costs due to the increased worker safety measures and monitoring. Thus, the estimated split between labor, materials, and equipment would be more heavily weighted toward labor and materials compared to equipment. For the buildings at 202, 214, and 220 South State Street, the total and annual demolition expenditures are expected to be split as shown in Table F-13. However, it is important to note that these are estimates and the final demolition costs may be split differently once a contractor is selected.

Table F-13. Demolition Costs (2022 dollars)

Cost Component	Assumed Split	Total Cost	Annual Cost
Total Demolition	100%	\$48,800,000	\$24,400,000
Local	80%	\$39,040,000	\$19,520,000
Materials	45%	\$17,568,000	\$8,784,000
Labor	45%	\$17,568,000	\$8,784,000
Equipment	10%	\$3,904,000	\$1,952,000

Because the accuracy of the results depends on the accuracy of the inputs, the cost estimates are considered preliminary and would change as engineering design is refined. Cost estimates, assumed to be in 2022 dollars, were run in the IMPLAN model in 2021 dollars. The labor income and total industry output from the IMPLAN model are reported in 2020 dollars to facilitate comparisons to existing employment and income levels in the study area, which are reported for the year 2020.

Demolition is expected to create temporary employment opportunities within and outside the study area. Most of the workers would likely live within the study area, and any non-local workers would use temporary housing in the study area such as hotels or similar. It is unlikely that temporary workers would relocate their families.

Table F-14 summarizes the regional economic impacts associated with Alternative A. The total annual employment in the study area is estimated to be 210 full-time equivalents (FTEs) and includes direct, indirect, and induced employment. Similar estimates would be expected in the second year of the assumed 2-year schedule for demolition.

As expected, the increase in regional employment would be accompanied by increased levels of income and total industry output within the study area (Table F-14). Alternative A is expected to result in an increase of about \$11.5 million (in 2020 dollars) in annual labor income and about \$31.1 million (in 2020 dollars) in annual total industry output, respectively, within the study area. Similar estimates would be expected in the second year of the assumed 2-year schedule for demolition.

Table F-14. Alternative A Regional Economic Impacts in Cook County

Impact Type	Employment (FTEs) ^[a]	Labor Income ^[a,b,c]	Total Industry Output ^[a,b]
Direct	150	\$7,440,700	\$18,680,900
Indirect	20	\$1,625,600	\$5,226,300
Induced	40	\$2,414,200	\$7,176,200
Total	210	\$11,480,500	\$31,083,400

Source: IMPLAN, 2022

^[a] FTEs rounded to the nearest 10 jobs while labor income and total industry output are rounded to the nearest \$100.

^[b] Labor income and total industry output estimates are in 2020 dollars.

^[c] Labor Income shown here is IMPLAN's Employee Compensation. Employee compensation includes total payroll cost of the employee paid by the employer. It includes wage and salary plus benefits and payroll taxes.

Assuming only a small percent of the workers performing the demolition would come from outside the study area, changes to employment in the study area would likely be minimal and would primarily be in the Construction sector, which had total employment of about 117,000 in 2020 (refer to Table F-9). The slight increase in employment would not cause changes to population and housing in the study area.

The annual total increase in regional labor incomes of \$11.5 million (in 2020 dollars) represents less than 0.01 percent of the total personal income in the study area \$207 billion. The \$207 billion estimate is derived from the \$39,239 in per capita income for Cook County multiplied by County's

2020 population. Thus, the changes to total personal income from Alternative A would not cause significant impacts to total personal income in the study area.

The annual increase in total industry output (or industry earnings), estimated to be \$31.1 million (in 2020 dollars), represents about 0.01 percent of the total industry output in the study area in 2020 of approximately \$270 billion. Therefore, Alternative A does not cause significant impacts to total industry earnings in the study area.

The purchase of materials in the study area is expected to cause increased sales tax revenues in the short-term, but it would make up only a small percentage of the total sales tax revenue in the County. Therefore, the potential increase in sales revenues under Alternative A is not expected to cause significant impacts to the study area's total sales tax revenues.

Under Alternative A, the short-term direct and secondary impacts to socioeconomic or fiscal conditions are likely to be minimal.

F.6.2.2 Long-term Impacts

If the buildings at 202, 214, and 220 South State Street were demolished, GSA would realize savings from avoiding future maintenance costs. Demolishing the buildings would also mean that neither GSA nor the City of Chicago would realize any economic benefits associated with the reuse of the buildings (refer to Alternative B, Viable Adaptive Reuse), and it may hinder the Chicago Loop Alliance's effort to revitalize South State Street as a retail destination.

While the individual contribution of these buildings to Chicago's heritage tourism is unknown and is expected to be limited, demolishing them may nominally reduce the Loop Retail Historic District as a heritage tourist attraction. The Loop Retail Historic District contains 109 buildings, of which 13 are buildings that were already determined individually eligible for the NRHP before the Loop Retail Historic District was added to the NRHP and 73 are buildings that were deemed to be contributing to the Historic District. Four of the 33 National Historic Landmarks in Chicago are in the Loop Retail Historic District. Given the limited direct tourism associated with the buildings at 202, 214, and 220 South State Street, and the large number of NRHP-listed buildings, contributing buildings, and National Historic Landmarks in the Loop Retail Historic District, demolishing the buildings at 202, 214, and 220 South State Street would be a relatively small direct loss to regional heritage tourism. Thus, Alternative A would not substantially compromise the Loop Retail Historic District as a whole or affect heritage tourism in the Historic District.

At the November 2022 scoping meeting, GSA received a comment that demolishing the buildings at 202 and 220 South State Street could compromise the UNESCO World Heritage Site nomination. While 202 and 220 South State Street are not among the nine buildings included in the nomination, they are examples of Chicago's early skyscrapers. If demolishing these buildings leads to rejection of the UNESCO World Heritage Site, there would be a missed opportunity to enhance heritage tourism in Chicago. However, it is unclear at this time if removing the buildings at 202, 214, and 220 South State Street would affect the UNESCO designation, as they were not in the nomination, and significant cultural character would remain in the Chicago Loop, despite these buildings' removal.

Chicago's architecture tours and heritage tourism are a multi-million dollar industry. There could be a financial impact of losing the three buildings at 202, 214, and 220 South State Street; however, the impact on architectural tours/heritage tourism is difficult to quantify because data on the number of heritage visitors and fiscal benefit is not separated by specific historic

buildings. As noted previously, the impact is likely minor given the number of remaining historic buildings and National Historic Landmarks in the Chicago Loop.

F.6.3 Alternative B, Viable Adaptive Reuse

Alternative B would involve collaborating with one or more developers who would use one or more of the three buildings at 202, 214, and 220 South State Street in accordance with viable adaptive reuse criteria. These criteria would be necessary to meet GSA's and federal law enforcement agencies' security objectives for the Dirksen Courthouse and would apply to any future uses of the three buildings. No federal funds are available for the rehabilitation, preservation, or restoration of 202, 214, and 220 South State Street; therefore, any rehabilitation or modification of the buildings to meet the criteria would not be performed at the federal government's expense.

Alternative B would likely have direct and secondary (indirect and induced) effects on the socioeconomic and fiscal conditions in the study area in the short-term and long-term. The impacts from renovation are assumed to be short-term while the impacts associated with the leasing of the buildings are assumed to be long-term.

F.6.3.1 Short-term Impacts

GSA developed a conceptual cost estimate of adaptive reuse of 202, 214, and 220 South State Street (Concord Group 2023).

Table F-15 shows the estimated total costs associated with renovation of the three buildings. Alternative B's total renovation cost was estimated to be \$407 million (in 2023 dollars).

Table F-15. Adaptive Reuse Renovation Cost Estimates, (2023 dollars)¹²

Building	Total Cost
202 South State Street	\$116,990,194
214 South State Street	\$15,094,053
220 South State Street	\$275,895,693
Total	\$407,979,940

Source: Concord Group 2023.

Because the IMPLAN model is an annual model that evaluates the regional economic effects associated with changes in local expenditures, the following assumptions were used to determine the annual local estimates:

- Construction duration of 48 to 54 months.
- 90% of the renovation costs are assumed to be spent locally (within Cook County), and 10% is spent outside the study area.
- Of the local expenditures, 70% are estimated to be on non-labor/material costs, and 30% are labor costs.

Based on these assumptions, the annual local cost estimates used to run the IMPLAN model of Cook County are as shown in Table F-16.

Table F-16. Annual Renovation Costs (2023 dollars)

Cost Component	Total Cost Estimate	Annual Cost Estimates Assuming 48 Months	Annual Cost Estimates Assuming 54 Months
Total Renovation Costs	\$407,979,940	\$101,994,985	\$90,662,209
Local (assume 90% local)	\$367,181,946	\$91,795,487	\$81,595,988
Materials (assume 70%)	\$257,027,362	\$64,256,841	\$57,117,192
Labor (assume 30%)	\$110,154,584	\$27,538,646	\$24,478,796

Because the accuracy of the results depends on the accuracy of the inputs, the cost estimates are considered preliminary and would change as engineering design is refined. Cost estimates, assumed to be in May 2023 dollars, were run in the IMPLAN model in 2021 dollars. The labor income and total industry output from the IMPLAN model are reported in 2020 dollars to facilitate comparisons to existing employment and income levels in the study area which are reported for the year 2020.

The renovation associated with Alternative B is expected to create temporary employment opportunities within and outside the study area. Most of the workers would likely live within the study area, and any non-local workers would use temporary housing in the study area, such as hotels or similar. Temporary workers are unlikely to relocate their families.

Table F-17 summarizes the annual regional economic impacts associated with Alternative B. All values shown represent a range, with the lower value for the impacts associated with the annual cost estimates under the longer (i.e., 54-month or 4.5-year) construction period and the higher value associated with the annual cost estimates under the shorter (i.e., 48-month or 4-year) construction period. The total annual employment in the study area is estimated to be between 610 and 690 FTEs, including direct, indirect, and induced impacts (Table F-17). Similar estimates would be expected in each of the remaining years under both the longer (54-month or 4.5-year) construction period and the shorter (48-month or 4-year) construction period.

As expected, the increase in annual total regional employment would be accompanied by increased levels of income and total industry output within the study area (Table F-15). This is estimated to result in an increase of about \$38.7 million to \$43.5 million (in 2020 dollars) in annual total labor income and about \$133 million to \$150 million (in 2020 dollars) in annual total industry output, respectively, within the study area.

Table F-17. Alternative B Regional Economic Impacts in Cook County

Impact Type	Employment (FTEs) ^[a]	Labor Income ^[a,b,c,d]	Total Industry Output ^[a,b]
Direct	390 - 440	\$21,061,800 - \$23,694,500	\$78,602,700 - \$88,428,000
Indirect	110 - 120	\$9,576,200 - \$10,773,300	\$30,786,800 - \$34,635,200
Induced	110 - 130	\$8,053,300 - \$9,059,900	\$23,940,700 - \$26,933,300
Total	610 - 690	\$38,691,300 - \$43,527,700	\$133,330,200 - \$149,996,500

Source: IMPLAN, 2022

^[a] First value in range corresponds to annual cost estimates under the longer (54-month or 4.5 year) construction period while the second value in the range corresponds to the annual cost estimates under the shorter (48-month or 4-year) construction period.

^[b] FTEs rounded to the nearest 10 jobs while labor income and total industry output are rounded to the nearest \$100.

^[c] Labor income and total industry output estimates are in 2020 dollars.

^[d] Labor Income shown here is IMPLAN's Employee Compensation. Employee compensation includes total payroll cost of the employee paid by the employer. It includes wage and salary plus benefits and payroll taxes.

Assuming only a small percent of the workers performing the renovation would come from outside the study area, changes to employment in the study area would likely be minimal and would primarily be in the construction sector, which had total employment of about 117,000 in 2020 (refer to Table F-9). The slight increase in employment would not cause changes to population and housing in the study area.

The increase in annual total regional labor incomes of between \$38.7 million to \$43.5 million (in 2020 dollars) represents about 0.02 percent of the total personal income of the study area of \$207 billion. The \$207 billion estimate is derived from the \$39,239 in per capita income for Cook County multiplied by the County's 2020 population. Thus, the changes to the total personal income resulting from Alternative B would not result in significant impacts to total personal income in the study area.

The increase in annual total industry output (or industry earnings), estimated to be between about \$133 million to about \$150 million (in 2020 dollars), represents between 0.05 percent and 0.06 percent of the total industry output in the study area, in 2020, of approximately \$270 billion (Table F-11). Therefore, the renovation associated with Alternative B would not result in significant impacts to the total industry earnings in the study area.

The purchase of materials in the study area is expected to result in increased sales tax revenues in the short-term, but it would likely make up only a small percentage of the total sales tax revenue in Cook County. Therefore, the increase in sales revenues under Alternative B is not expected to result in significant impacts to the study area's total sales tax revenues.

F.6.3.2 Long-term Impacts

For analyzing the long-term impacts of Alternative B on the economy, GSA assumed that the buildings at 202, 214, and 220 South State Street would be adapted for office use. This assumption was made because office use is the best use from an economic activity standpoint

(i.e., it would produce the most revenue). Therefore, it represents the greatest impact and the largest loss of economic opportunity under Alternative A.

If the companies occupying the buildings are new to the study area, there would be added economic benefits from employment opportunities for County residents as well as multiplier effects that these opportunities represent within the County. In addition, there would be an economic benefit to the Chicago Loop from potential new business customers. New workers at 202, 214, and 220 South State Street and potentially new workers that relocate to the Loop would likely frequent retail businesses and restaurants nearby. This increase in business customers may support the Chicago Loop Alliance's effort to revitalize South State Street as a retail destination.

GSA, as a federal entity, does not pay any property tax or make any payments in lieu of property tax to the city or county. However, the leaseholders (i.e., outlease) for the buildings would be expected to pay leasehold tax to the City (Zitzer, pers. comm. 2023). Without specific information related to the agreed-upon lease amounts for the buildings or the City's applicable leasehold tax rate, the actual amount of tax revenues that the City would realize was not calculated. However, the leasehold tax paid by the leaseholders for 202, 214, and 220 South State Street is likely to be a very small percentage of the total leasehold tax the City collects on leased buildings. There would be a minor benefit to the City.

If the buildings at 202, 214, and 220 South State Street are adapted for office use, this would create a long-term revenue stream for GSA through building leases. The approximate average rent for an office building in the Central Loop is \$41.40 per square foot (JLL 2022). Assuming a 21% vacancy,³ this could equate to nearly \$2,500,000 per month for the 75,000 square foot Century Building, and over \$8,000,000 per month for the 250,000 square foot Consumers Building. In total, the lease revenue from the buildings at 202 and 220 South State Street would be approximately \$10,500,000 per month.

Alternative B would retain the three buildings at 202, 214, and 220 South State Street and is not anticipated to remove key character-defining features. While the individual contribution of the buildings to Chicago's heritage tourism is unknown, adaptive reuse would preserve these examples of Chicago's architectural history, which draws visitors to Chicago and benefits the economy. There would likely be no effect on the heritage tourism industry.

F.7. References

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