

Appendix B

Section 106 Consultation

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B1. Meeting Minutes

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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

(sorted

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
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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.

Kandilyn 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.

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):

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| 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 |

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| 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 Koeppl - 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.



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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.



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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.



Minutes

Attendees (sorted alphabetically):

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|--|
| Alexander Zeier – US Courts |
| Anthony Rubano – IL SHPO |
| Benjamin Rhodd – THPO, Forest County Potawatomi Community |
| Beth Savage – GSA |
| Betsy Merritt – NTHP |
| Brad White – Consulting as an Individual |
| Brie Martin – Franciscan Friars Archive |
| Burgundy Fletcher – Peoria Tribe of Indians of Oklahoma |
| Carla Mykytiuk – Jacobs |
| Carol Wallace – IL SHPO |
| Charlie Webb – Jacobs |
| Christopher Cody – NTHP |
| Cindy Roubik – City of Chicago, Department of Planning and Development |
| Dirk Lohan – AIA Chicago |
| Eiliesh Tuffy – City of Chicago, Department of Planning and Development |
| Frank Butterfield – Landmarks Illinois |
| Greg Rainka – Commonwealth (Jacobs team) |
| Holly Fiedler – Franciscan Central Archive; Chicago Collaborative Archive Center |
| Jeffrey Jensen – GSA |
| Jennifer Styzek - GSA |
| Joe Mulligan - GSA |
| Keira Unterzuber – Administrative Office of the U.S. Courts |
| Kelly Yasaitis Fanizzo – ACHP |
| Kendra Parzen – Landmarks Illinois |
| Kevin Harrington – Mies van der Rohe Society of the Illinois Institute of Technology |
| LaDon Reynolds – Chief Marshal, USMS, Northern District of Illinois |
| Laura Lavernia – ACHP |
| Lori Durio Price – Jacobs |
| Lucrezia Patruno – GSA |
| Marc Zitzer – GSA |
| Mariah McGunigle – GSA |
| Mark T. Buechel – NPS |
| Marla Kavouras – GSA |
| Mary Lu Seidel – Preservation Chicago |
| Megan Funk – Commonwealth (Jacobs team) |
| Michael Edwards – Chicago Loop Alliance |
| Michael Finn - GSA |
| Naima Prince - GSA |
| Nicky Emery – GSA |
| Rebekah Mills – ACHP |



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Regina Nally – GSA

Robert Green – GSA

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

Steve Kuchera – GSA

Tara Mitchell – Deputy THPO, Prairie Band of Potawatomi Nation

Todd Satter – GSA

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) began the meeting by reminding participants of the privileged status of the consulting parties and the importance of not sharing the information presented with outside parties due to its potentially sensitive nature. She informed everyone that the meeting was being recorded and asked that those who are not speaking keep their microphones muted.

Joe Mulligan (GSA) welcomed new participant Burgundy Fletcher who is the new historic preservation specialist for the Peoria Tribe. Mariah McGunigle (GSA) also introduced herself and explained that she is the regional chief architect for the Great Lakes region and though she hasn't attended prior consulting parties' meetings, she has been working with the project team in the background including the upcoming charrette.

Joe recognized that some of the consulting parties provided feedback about changes to the City of Chicago administration. He said the subject properties are now in the 34th Ward and that the GSA team has been in contact with Alderman Conway and plans to meet with his office next week. A representative of the office will be invited to future meetings.

Joe passed the meeting to Regina Nally (GSA) who outlined the agenda for the meeting including a presentation on findings of effects, time for Q&A, discussion of reuse ideas, an ongoing real estate study, and an overview of upcoming plans. Regina then introduced Megan Funk (Commonwealth/Jacobs) who provided a recap of the presentation on historic properties identified in the APE that was shared at the June meeting.

Megan's presentation began with archaeological resources. She shared that though no resources have been identified in the footprint of the subject properties and the probability of finding resources in the area is low, the final plan and programmatic agreement will include procedures for monitoring the site and mitigating damage to resources that may be discovered.

Regarding above-ground properties, the study identified six historic districts, either completely or partially within the APE. Megan shared that all of these are listed in the NRHP except for the Historic Michigan Boulevard District, which was previously determined eligible for listing in the NRHP. Those completely within the APE include the Loop Retail Historic District, the Chicago Federal Center, and the South Dearborn Street Printing House Row North Historic District, which is also a National Historic Landmark. Districts that partially overlap the APE are the Historic Michigan Boulevard District, West Loop-LaSalle Street Historic District, and the South Loop Printing House Row Historic District.

She then recapped the number of individual resources surveyed:

- 163 total
- 139 within a historic district
 - o 103 contributing
 - o 36 noncontributing



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- 17 individually listed in the NRHP
- 7 designated as National Historic Landmarks
- 1 previously determined eligible for the NRHP
- 24 outside a historic district
 - 1 listed in the NRHP
 - 3 previously determined eligible for the NRHP
 - 10 determined eligible as a part of this study
 - 10 determined not eligible as a part of this study.

Properties determined eligible include:

- Italian Village, 71 West Monroe Street
- Mid Continental Plaza, 55 East Monroe Street
- Chicago Engineers Club, 314 South Federal Street
- Standard Club, 320 South Plymouth Court
- City Club, 315 South Plymouth Court
- Sears Building, 19 West Jackson Boulevard
- Continental Center II, 55 East Jackson Boulevard
- Big Red, 333 South Wabash Avenue
- 55 W. Monroe (former Xerox Center), 55 West Monroe Street
- Skidmore, Owings, and Merrill Building, 33 West Monroe Street

Properties determined not eligible include:

- 73 W Monroe Street, constructed in 1882 and substantially altered
- Citadel Center, 131 South Dearborn Street, constructed in 2003, less than 50 years old
- Metcalfe Federal Building, 77 West Jackson Boulevard. constructed in 1991, less than 50 years old
- Plymouth Restaurant, 327 South Plymouth Court, constructed in 1899, substantially altered
- Chicago Bar Association, 321 South Plymouth Court, constructed in 1990, less than 50 years old
- Pritzker Park, northwest corner of South State and West Van Buren Streets, lacks significance
- A surface parking lot, 221 South Wabash Street, lacks significance
- Two parking garages, 330 South Federal Street and 331 South Plymouth Court, lacks significance
- A segment of Route 66 in the APE, Adams Street from Michigan Avenue to Wells Street, loss of integrity

Ward Miller (Preservation Chicago) asked if the ineligibility of this segment of Route 66 will affect the potential eligibility of the buildings along the segment. Megan responded that though many of the buildings have changed the setting of the road, the status of the road will not affect the eligibility of the buildings on Route 66. These are being evaluated separately from the road. Ward asked and Megan clarified that the ineligibility applies to the roadway, not the buildings along it.

Ward also asked if the consulting parties can or will receive a list of the addresses and names of the properties surveyed. Lori Price (Jacobs) reassured Ward that once the survey report is complete, which has been pending feedback from the consulting parties' meetings, a table of all the properties will be distributed. Megan added that the table includes names, addresses, construction dates, known architects, and eligibility determinations.

Anthony Rubano (IL SHPO) pointed out that 214 South State Street was determined eligible and communicated to GSA in a letter dated May 24, 2023. He asked if its status as eligible was reflected by the numbers shared. Joe and Megan answered that it was.



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Next, Lori gave a presentation on the finding of effect. She began with an explanation of Section 106 and how a finding of effect is determined, including the regulatory language from 36 CFR 800.5(a)(a), which states that “An adverse effect is when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify that property for inclusion in the National Register in a manner that would diminish the integrity of the properties.” She then recapped the seven aspects of integrity—location, design, setting, materials, workmanship, feeling and association.

She then discussed the process, which begins with a project, or undertaking, involving a federal agency, and the requirement to determine if the undertaking as a whole will have an effect on historic properties. Lori reiterated the historic properties and districts in the APE and explained that each was analyzed for effects and those results contributed to the effect finding. Lori emphasized that though every historic resource in an APE is evaluated, Section 106 allows each undertaking to have only one of three possible findings: no effect, no adverse effect, or adverse effect.

Lori explained each finding. In the case of “no effect”, there are either no historic properties within the APE or there are historic properties, but the undertaking will not affect the characteristics of the property that make it eligible for the NRHP. In other words, there will not be any effect to its eligibility. The second finding, “no adverse effect,” relates to when there are one or more historic properties in the APE and the undertaking may affect at least one of those properties, such as changing its setting, but the effect is not great enough to alter the characteristics that qualify the property for inclusion in the NRHP. In example, a change to the setting that does not diminish the overall integrity and/or significance of the property. Lastly, a finding of “adverse effect” means that there are one or more historic properties in the APE and at least one is affected in a way that compromises its significant characteristics or integrity, and, therefore, its eligibility for inclusion in the NRHP. In other words, if only one of many historic properties in the APE is adversely affected, the overall undertaking will have a finding of adverse effect. The three allowable findings do not account for the degree of adverse effect the undertaking may have, simply if it does or does not have an adverse effect.

Next, Lori explained the Section 106 process following the federal agency’s, in this case the GSA, analysis and finding of effect. The first step is to work with the consulting parties to reach an agreement on the finding of effect. This also includes the IL SHPO and the Advisory Council on Historic Preservation. Once an agreement is reached, discussions begin about possible avoidance, minimization, and mitigation strategies that will be incorporated in an agreement document aimed at resolving potential adverse effects. The agreement document can either be a memorandum of agreement or a programmatic agreement. For this undertaking, GSA has determined that a programmatic agreement is most appropriate.

Lori provided additional examples of potentially adverse effects including:

- physical destruction or damage to all or part of a historic property
- alteration, such as a rehabilitation that is designed inconsistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties
- changes to the character
- changes to the use
- changes to physical features within the property’s setting
- changes brought on by the introduction of visual, atmospheric, or audible elements

After this, Lori discussed the application of the seven aspects of integrity—location, design, setting, materials, workmanship, feeling, and association—and gave brief examples of each, emphasizing the straightforwardness of most of the aspects.

- Location- where the property is located or originally located
- Design- the aesthetic of the property
- Materials- what it is constructed of or originally constructed of
- Workmanship- the craftsmanship and skill present in the construction, such as laying masonry or creating terra cotta embellishments



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- Association- does it still convey its connection with an important event or time period, especially if it is eligible under Criterion A. For example, the Loop Retail Historic District is associated with the early commercial and retail history of downtown Chicago.

Lori pointed out that setting and feeling tend to be harder to understand. Setting is the relationship of the property to its physical environment, often outside of its parcel boundary, and the character of that environment, particularly during the property's period of significance. Setting can reflect concepts and aesthetic preferences that a designer took into consideration when designing a property. For example, Mies van der Rohe's design of the Chicago Federal Center took into consideration the relationship of Quincy Court and the subject buildings making them a character-defining feature of its setting. The integrity of setting considers the relationships between buildings or historic properties and other features of the surroundings and whether or not they are important to a property's historic significance. Lori pointed out that this is especially important when evaluating historic districts.

Feeling is a property's aesthetic expression or the historic sense it conveys of its period of significance. It results from the combination of all of its physical features and all of the aspects of integrity. Lori used the Loop Retail Historic District as an example and pointed out how it has changed since its period of significance through the loss of early department stores, yet it still conveys the feeling of a historic retail corridor. She then referred to the "National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation" for more information on the seven aspects of integrity. She concluded the discussion on the aspects of integrity with a few questions one can ask when evaluating the impact of an undertaking on the feeling of a property.

1. Will the property still feel like it did during its historic period if this undertaking were to occur?
2. Will the sights and sounds be effected?
3. Will visual changes be a significant departure from the viewsheds of the site during its period of significance?
4. If a person from the period of significance came back and saw the property now, could they recognize it?
5. Will the property still convey its significance? Will it retain the important aspects that allow it to do so?

Mark Buechel (NPS) stated that in addition to Section 106, Section 110(f) of the National Historic Preservation Act (NHPA) should also be discussed because it addresses NHLs, of which there are multiple in the APE. Mark added that this section includes additional language that is above and beyond Section 106 and states that if you're going to adversely affect an NHL, you have to seek to avoid the effect to the maximum extent possible.

Regina responded that Section 110(f) is being addressed in the written documentation and that for the purposes of this presentation to consider "Section 106" as referring to both sections of the NHPA.

Lori also pointed out that though there are NHLs in the APE, none have been identified as being adversely affected. She added that those properties will be addressed in the next portion of the presentation.

Concluding her discussion, Lori shared that for both the demolition and rehabilitation alternatives, the GSA determined the undertaking has potential for adverse effects. Under Alternative A, demolition, the undertaking will have an adverse effect on multiple historic properties, particularly the subject buildings as well as the Loop Retail Historic District, which would lose three of its contributing buildings. Additional buildings that contribute to the Loop Retail Historic District and are adjacent to the subject buildings will also be adversely affected and so will the adjacent Chicago Federal Center. Under Alternative B, viable adaptive reuse, the only historic properties GSA determined to have a potential adverse effect are the subject buildings. The determination is due to the early stages of the planning process and lack of information as to how they will be rehabilitated and repurposed. Lori gave the example of potentially



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having to fill in some of the rear windows to meet the security concerns of the federal courthouse, which is not in line with the Secretary of the Interior's Standards for Rehabilitation.

Lori reiterated that though there are no known significant archaeological resources in the APE or footprint of the buildings, if resources are present, they will only be affected by the demolition alternative or if the viable adaptive reuse alternative involves removal or partial removal of basements or foundations of the subject buildings or other deep ground disturbance beyond what has already occurred. In this case, a monitoring plan to minimize possible effects will be stipulated in the programmatic agreement.

Lori showed a map of the APE that summarized GSA's initial assessment including the properties that could be adversely affected by Alternative A, demolition:

- 202, 214, 220 South State Street
- The Loop Retail Historic District and contributing properties immediately adjacent to the subject properties
- The Chicago Federal Center

Lori then listed properties that the initial assessment determined would not be adversely affected by Alternative A, demolition:

- West Loop-LaSalle Street Historic District
- South Dearborn Street-Printing House Row North Historic District
- South Dearborn Street-Printing House Row District
- Historic Michigan Boulevard District

Lori presented photos taken from different vantage points in the APE toward the undertaking. She began with a view of 202-220 South State Street and the Dirksen Courthouse from the northeast corner of State and Adams Streets. She pointed out how removing the buildings would eliminate contributing contextual structures from the district and leave a gap in the street wall and how the continuous face of the street wall is a character-defining feature of the historic retail corridor and district. Thus resulting in an adverse effect. She also clarified that though not every building in the district has a view of the subject buildings, their removal still has an effect, in this case an adverse effect, on the district as a whole.

Lori then pointed to the map accompanying the photo and noted the properties surrounding the undertaking that are shaded in bright green indicating that they contribute to the Loop Retail Historic District. She noted that the setting of these historic properties would be adversely affected by the loss of the subject buildings and that some of the closest buildings, such as the Berghoff buildings (Stone and Palmer Buildings), could be physically damaged, though that is not anticipated. Lori also emphasized how the loss of the buildings would fully expose the east elevation of the Dirksen Courthouse to State Street.

The next photo showed the Chicago Federal Center from the northwest corner of Clark and Adams Streets. Lori stated that though the subject buildings are barely visible that because of the adverse effect on the east side of the Dirksen Courthouse, the whole of the complex, or district, is affected.

Lori then showed a photo looking west from the Michigan Boulevard Historic District along Adams Street at Michigan Avenue and toward the subject buildings. She noted how the absence of the subject buildings would be minimally noticeable from the Historic Michigan Boulevard District, resulting in an effect, but not to the point that its historic character and significance—such as its architecture, association with prestigious organizations, and the Chicago skyline—would be compromised or its eligibility for the NRHP lessened, thus resulting in no adverse effect.

Ward disagreed with the assessment of no adverse effect because of the connection between the subject buildings and all of Chicago, including the Historic Michigan Boulevard District. He emphasized that the buildings are a part of the story of Chicago and its role as America's city of architecture. He offered that to some degree he understood the logic of the assessment but emphasized the larger story of the



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development of the skyscraper, Chicago's role on the world stage, and once again that he disagreed with the findings.

Regina and Lori acknowledged his comments and thanked him for sharing them.

Lori presented a photo taken from the West Loop-LaSalle Street Historic District looking east on Adams Street. Again, only a sliver of the subject buildings was visible, and the assessment resulted in a finding of no adverse effect. Lori emphasized that just being able to see a historic building and it being removed from the viewshed is not enough to affect the qualities of the historic district that make it significant or to cause an adverse effect.

Ward disagreed with the finding for the same reason as he disagreed with the assessment of the Historic Michigan Boulevard District. He also emphasized how all of the buildings and districts do relate to one another.

Regina thanked Ward and Joe added that there will be time for discussion and feedback after the presentation.

The next photo showed the approximate location of the undertaking from where the South Dearborn Street-Printing House Row North Historic District (an NHL district) overlaps with the South Loop Printing House District. From this vantage point, the subject buildings are not visible. Lori added that as an NHL, the South Dearborn Street-Printing House Row North Historic District is significant for its architecture and its association with the early printing industry in Chicago, and how the loss of the subject buildings will not impact the integrity and ability of the NHL district to convey its importance, and therefore the undertaking will have no adverse effect. As the South Loop Printing House District is slightly farther from the subject buildings and also has no view of the buildings, the undertaking will not affect its significance and thus will have no adverse effect.

Lori then shared information about the individual properties outside of the historic districts. She also pointed out the non-historic or non-contributing properties within the immediate vicinity of the undertaking, which equate to roughly half of the surrounding properties. As for the listed or eligible properties outside of the historic districts, none will be physically affected by the undertaking due to the distance between them. Those that are tall and have views of the subject buildings will not be adversely affected (undermining their historic or architectural integrity) due to the limited role the subject buildings serve in their setting as well as the significance of their architectural design as the basis of their eligibility. Lori's next example was the Standard Club, which was determined eligible for the NRHP as a part of the architectural survey. The Standard Club has a view of the south elevation of the Consumers Building, but Lori explained that its significance does not rely so much on its surroundings but on its architecture—one of few buildings designed by Albert Kahn in Chicago—and its association with the Standard Club social organization, which is one of Chicago's, most influential clubs, particularly in the Jewish community.

Questions about the presentation were addressed next, beginning with Mark who brought up the proximity of the NHL Marquette Building (140 South Dearborn Street) to the subject buildings and that it is a contributing resource to the West Loop-LaSalle Street Historic District. He pointed out that there is a view between the Marquette Building and the Century Building (202 South State Street) and that an alteration of the view is an effect. Lori agreed but clarified that it is not adverse. Mark suggested considering it further and making a determination specific to the Marquette Building.

Mary Lu Seidel (Preservation Chicago) spoke next. She stated that she agreed with the comments made by Ward and Mark and that the discussion about visual effects was not taking into consideration the whole of the collection of buildings, the districts, and the NHLs. She shared that in her experience with Section 106 it is rare to see an APE that is almost entirely filled with historic districts and landmark districts. She also noted the odd shape of the APE and that she would have preferred a square or circle.



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She then stated that it's been very distressing to hear the historic properties looked at as individual pieces instead of as a collective whole.

Lori answered by emphasizing that though each property was assessed individually, the finding of effect relates to the undertaking as a whole, and as such, GSA has determined a finding of adverse effect to the collective whole. This means that there will be a discussion on how to avoid, minimize, and mitigate effects to the collection of historic properties in the APE. Additionally, for the purposes of Section 106, having multiple adverse effects does not allow for a finding of effect other than adverse, but the types of adverse effects can and will be addressed through the activity of avoiding, minimizing, or mitigating the adverse effects. Now that GSA has determined that there will be an adverse effect, the next step is to find agreement with the involved parties and begin discussing strategies for avoidance, minimization, and mitigation that will be incorporated into an agreement document. She also agreed with the point about NHLs and providing more analysis to fulfill Section 110(f).

In conclusion, Mary Lu emphasized the importance of acknowledging the impacts on individual properties, even if they are small, when considering avoidance, minimization, and mitigation, as well as considering those impacts on the community as a whole. Regina responded that addressing viewsheds is something that can be part of the avoidance, minimization, and mitigation discussions.

Kevin Harrington (Mies van der Rohe Society/IIT) asked in the chat if there is a maximum or minimum limit of adverse effects and, even if the parties disagree about individual effects, will any adverse effect be avoided. Regina responded that yes, GSA would try to avoid as many adverse effects as possible.

The next comment was from Rolf Achilles (Mies van der Rohe Society/IIT) who pointed out that all of the photos provided are from street level/a five-foot vantage point despite the APE being filled with skyscrapers that have views from much higher. In particular, the NHL Marquette Building, which has a different view from the eighth floor than the ground floor.

Lori explained that this is taken into consideration and reiterated that the effect on a historic property is assessed based on the characteristics and significance that made the property eligible for the NRHP and whether the effect will compromise those aspects of its integrity and therefore its continued eligibility. In this case, is it affected by a change to its viewshed. She elaborated that how a viewer sees the city is considered a visual impact under NEPA (National Environmental Protection Act) but is not analyzed under Section 106.

Rolf further emphasized how all of the photos shown are from street level and do not portray the view from upper stories. Megan Funk (Commonwealth/Jacobs) pointed out that in some cases the lack of photos from upper stories is due to limited access to the buildings, particularly if it is an apartment building or even an office building, but that she understands his comments about the view being different. Rolf shared that he has been able to access upper stories of buildings without any difficulty.

Regina stated that she understood how the views are important, and asked, rhetorically, if the views are actual character-defining features of the properties. Further, the view of individually listed buildings is rarely part of that building's character defining features. Rolf briefly reiterated his concern and Regina asked if when a property is nominated to the NRHP, is the view identified as a character defining feature. In some cases, the surroundings are identified in the original design as part of the concept, but in the case of the individually listed or eligible properties outside of the historic districts, none of those claim the viewshed as a character defining feature. She ended saying that even though changes to those viewsheds do not adversely affect the properties, that maybe thought should be put into how to avoid, minimize, or mitigate effects to them, even though they are not adverse. Rolf restated his concern about only the ground level being considered and Regina reiterated that the viewshed, particularly to the Loop Retail Historic District, is not a trait that qualifies it for the NRHP. Joe added that the photos were to provide understanding of the process, the factors that are taken into consideration, and serve as examples of how that is done.



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Kevin commented next, pointing out that it has already been established that the buildings are important unto themselves as well as contributing to a larger region. The next issue is how to preserve them in a way that's beneficial to everyone. He stated that the Section 106 discussion has so far focused on the demolition alternative versus the other alternatives and that the consulting parties need to start discussing how to solve the problem of preserving the buildings. He also shared that he is a part of a group that thinks the buildings would serve as a great archive center, and again emphasized that the first step is to figure out how to preserve the buildings and maintain their quality in one of the great urban environments in the world, the Chicago Loop.

Joe responded that adaptive reuse will be part of the upcoming discussions. This presentation will share and update on the development of the charrette meetings, which will have that specific focus. Mark then shared that he would like to see an interpretation from the SHPO on whether a character defining feature has to be impacted for there to be an adverse effect. As someone involved in Section 106, he disagreed with that interpretation, particularly the reasoning that a property is listed for architecture and the architecture itself is not being impacted. He emphasized that any of the seven aspects of integrity can be impacted and cause an adverse effect and that he felt like the GSA was using a very narrow interpretation of adverse effects.

Lori responded that every historic property has defined reasons that it is historically significant. It can be just architecture or architecture and history. Then there are the aspects of integrity and how much of each aspect is retained as well as how important that aspect is to the significance of the property. Every property is assessed using the same process but based on its own qualities. Some have very important settings, but others, like the more modern buildings that were determined eligible by this study, are significant for architectural design and their association with master architects and/or architectural movements. Their setting is an aspect of their integrity but is not the reason they are significant. Lori added that some were actually constructed in defiance of the historic setting, replacing historic buildings, and aiming to stand out among them rather than fit in. Their significance is not related to the subject buildings.

Regina spoke next addressing Kevin's previous comments about the focus placed on the adverse effects of the demolition alternative and reassured everyone that the other alternatives have not been taken off the table. This discussion is about the effects of all the alternatives, but demolition is the alternative that will have the most effects. She reiterated that this presentation was to share those effects in preparation for discussing avoidance, minimization, and mitigation and that no alternative has been chosen.

Laura Lavernia (ACHP) asked if the rarity of a resource has been considered, such as how many buildings like the subject buildings are in the district and how important the buildings are to the evolution of the Chicago skyscraper or the commercial district. She also emphasized that every building in Chicago is interrelated and how architects learned from one another. She also asked if there is anything in the buildings that is the first of something or represents an evolution of engineering or architectural idea, not just a stylistic idea.

Joe thanked Laura and invited Kelly Yasaitis Fanizzo (ACHP), who had her hand raised, to speak. Kelly stated she agreed with Laura's points and apologized for not being involved in all of the consulting parties' meetings. From being a part of this meeting, she understood the group to be at the point of finalizing the identification of adverse effects in the lead up to an effect finding and emphasized that the finding would be adverse. In regard to identifying adverse effects, Kelly elaborated on the conversation about viewsheds and pointed out that though viewsheds may not have been mentioned in an NRHP nomination, due to the passage of time and new perceptions, it would be worthwhile to revisit that assessment. She also commented on the intense focus on the demolition alternative versus the others and said that the intent of this stage of the process should be to first think of ways to avoid an adverse effect entirely and once those are fleshed out, then make a determination of effect that is specific to that course of action.



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Joe pointed out that while this discussion has focused on the effects of the demolition alternative, the upcoming charrettes will focus on preserving the buildings through adaptive reuse and avoiding demolition.

Holly Fiedler (CCAC/FCA) asked if, in addition to the effect on historic districts, which were part of the viewshed discussion, if the setting, feeling, and association of individual buildings would be affected too. Regina responded that they do acknowledge the effect on those aspects of the historic buildings and districts. Holly elaborated pointing out the relationship between the historic districts and how they developed alongside each other for a reason. Lori answered that in some cases there is an effect, but that it is not an adverse effect because it does not affect its integrity as defined in its nomination to the National Register and thereby does not affect its continued eligibility for National Register listing. She offered to review the information and whether the feeling or association of any of the districts was impacted, but reiterated that if so, it was not adverse.

Joe reminded the group that they would receive a summary of the effects and a copy of the presentation.

Mary Lu asked in the chat about the evolution of NRHP nominations and situations where the awareness of a building and its setting wasn't noted completely when the nomination was written 10, 15, or 20 years ago. Preservation is evolving and our assessment of effects needs to evolve as well. Regina responded that this may be a question for the GSA, SHPO, and ACHP to discuss and come back to the group with more information.

Joe reminded the group that they could submit additional questions or comments to the StateStreet@gsa.gov email, and they will be incorporated in the project report. He then passed the presentation on to Nicky Emery (GSA).

Nicky recapped the "homework" assignment that was presented at the last meeting. This assignment provided participants with an outline for submitting adaptive reuse ideas and ideas were to be submitted by July 25th, a week following this meeting. Nicky opened the floor to questions about the assignment.

Brad White asked for more clarity on the overall process and stated that, in his opinion, the two most viable uses—hotel or apartments—have already been eliminated. He asked for more information on why the security criteria rule them out. He also brought up the archive idea but asked who would be able to fund the \$400 million to pay for the renovation and stated that by eliminating the most viable uses the outcome has been predetermined. Lastly, he pointed to the responsibility of finding a viable use being shifted to the consulting parties.

Regina acknowledged the constraints of the security requirements but also her hope that the consulting parties can have creative discussions about other uses. She also responded to the shift of responsibility and stated how the GSA wants to work together to share ideas and seek someone to fulfill that idea once it is defined.

Brad then pointed out that other buildings adjacent to the Chicago Federal Center, such as the Marquette Building directly across the street, do not have to adhere to the security requirements because they are not owned by the federal government and could be developed as residential.

Joe responded that the subject buildings were purchased due to security concerns and because they are different from surrounding properties. In addition to security of the courthouse, the federal government anticipated greater space needs which fell through. This is explained further in the Environmental Impact Statement (EIS).

Brad reiterated that if an adjacent building was developed for a use eliminated from the options of the subject buildings, it would pose just as much of a risk, and asked how that development differs. Regina



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said the main difference is that the federal government owns the buildings while the others are privately owned. After reiteration by Brad, Regina cited the specific location of the buildings and how there is no simple answer to his question. She reiterated that they are trying to find redevelopment opportunities that accommodate the security requirements and are still viable.

Brad then asked how the GSA defines a redevelopment opportunity and pointed to the high rehabilitation cost. Regina reiterated the charrette is part of that process and recognized how much of the rehabilitation costs are related to deferred elements that need repair, but that a developer may be able to find economies of scale that may make total project costs less than the sum of the itemized deferred maintenance totals developed by GSA's AE. She brought up a previously interested developer and how that proposed investment was significantly lower than the sum of the estimates for individual building items or systems, which will also vary based on the use or uses.

Brad returned to the issue of eliminating residential and hotel, why the previous project was stopped, and said that focus should be placed on finding a way to make those options work, but in a secure fashion. Joe explained that the project stopped because the developer was not able to overcome the security concerns. He added that they are trying to be more upfront about those concerns this time around so that a viable redevelopment can be found.

Nicky followed up stating that the collection of input and new ideas is part of the reason for bringing together the people and groups involved in the consulting parties meetings.

Next Jeff Jensen, a historic preservation specialist with the GSA Central Office, provided an update on a study conducted by Emax, a real estate advisory service. The study was prompted by the changing post pandemic federal real estate environment in an effort to leverage its historic properties. The study takes into consideration the larger portfolio of historic buildings to try and identify leasing potential including options for the subject buildings. Jeff stated that when complete, GSA hopes to be able to reach out to developers and investors to gauge interest in viable reuse options, which will help inform conversations about the subject buildings. Jeff said that it has only been a few weeks since asking Emax to look at the State Street property but that more information should be available soon.

Joe provided an update on 212 South State Street. Demolition concluded on the building at the end of June and GSA is still in the process of repairing the adjacent walls that were exposed by the demolition, primarily repointing the brick. There was no damage to the neighboring properties. Additionally, the site will be landscaped and fenced-in over the next few months.

Regina shared that they do not have dates for the August meeting yet, but they will be sending follow up information via email. She also shared that they are considering two meetings, one to follow up with today's discussion of adverse effects and a second meeting to kick off the charrette process. At this juncture, GSA anticipates the charrette process could have three opportunities for engagement. The engagement objectives will be to share and discuss ideas, involve development, finance, construction, and design professionals to help vet the proposed ideas, and assess which ideas have the best opportunity to be successful for GSA to pursue further. There will also be a consulting parties meeting in September to discuss avoidance, minimization, and mitigation efforts to be incorporated in the programmatic agreement.

Kendra Parzen (Landmarks Illinois) asked for clarification that outside participants will be invited to participate in all or just a portion of the charrette. Joe responded that the intent is to involve outside participants (development, finance, construction, and design professionals) in each meeting. Kendra then pointed to the examples on the worksheet and asked how much emphasis is being placed on financial viability and market response versus non-profits and other low-income producing options.

Joe responded that profitability is not necessarily important, but the strategy does need to have a financial consideration. The expectation is to go from visionary to viable, with the viable portion recognizing the



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need for capital. Joe pointed out that many of the parties involved are familiar with public private partnerships and other government grants or funding opportunities and that their feedback will be useful in determining if an idea is viable and financially feasible.

Ward spoke next, agreeing with Kendra's comment about the worksheet. He shared his experience with charrettes and how they are typically a meeting of architects, planners, and other professions all in a room together. He suggested that the first charrette session be an opportunity for those people who are most familiar with charrettes and development projects to talk about charrette strategies and design principles so that those unfamiliar with charrettes will be prepared for the next sessions and hopefully better prepared to provide viable solutions.

Joe agreed and said they are planning to host the charrette in person at GSA's regional office. He added that GSA plans to organize the charrette to touch on all the aspects important to the consulting parties. He brought up Ward and his colleagues' idea of an archive and offered to have it on the agenda so it could be evaluated by everyone involved and emphasized that this applies for anyone else with an idea.

Regina added that this charrette doesn't fit the common definition of a design-based charrette and is intended to help form visionary concepts and uses that are both applicable and marketable, rather than focusing on design, which will come later.

Joe then adjourned the meeting, thanking everyone for their time and assured the meeting attendees he would follow up on questions and comments, as well as plans for upcoming meetings and charrettes.



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Minutes

Attendees (sorted alphabetically):

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| Alexander Zeier – US Courts, Northern District of Illinois |
| Angela Miklich – GSA |
| Anthony Rubano – IL SHPO |
| Betsy Merritt – NTHP |
| Brad White – Consulting as an Individual |
| Brie Martin – Franciscan Friars Archive |
| Carla Mykytiuk – Jacobs |
| Carol Wallace – IL SHPO |
| Christopher Cody – NTHP |
| Christopher Koeppel – ACHP |
| Clarke Devereux – US Courts, Northern District of Illinois |
| Dan Speicher – Jacobs |
| Dirk Lohan – AIA |
| Eiliesh Tuffy – City of Chicago, Department of Planning and Development |
| Frank Butterfield – Landmarks Illinois |
| Greg Rainka – Commonwealth (Jacobs team) |
| 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 |
| Kendra Prazen – Landmarks Illinois |
| Kevin Harrington – Mies van der Rohe Society, Illinois Institute of Technology |
| LaDon Reynolds – U.S. Marshal, USMS, Northern District of Illinois |
| Laura Lavernia – ACHP |
| Lori Durio Price – Jacobs |
| Lucrezia Patruno – GSA |
| Malachy McCarthy – Claretian Missionary Archives |
| Marc Zitzer – GSA |
| Mariah McGunigle – GSA |
| Mark T. Buechel – NPS |
| Mary Lu Seidel – Preservation Chicago |
| Megan Funk – Commonwealth (Jacobs team) |
| Michael Edwards – Chicago Loop Alliance |
| Michael Finn - GSA |
| Nicky Emery – GSA |
| Rob Johnson – BOMA Chicago |
| Robert Green – GSA |
| Rolf Achilles – Mies van der Rohe Society, Illinois Institute of Technology |



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Steve Kuchera – GSA

Todd Satter – GSA

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) began the meeting by reminding participants of the privileged status of the consulting parties and the importance of not sharing the information presented with outside parties due to its potentially sensitive nature. She informed everyone that the meeting was being recorded and asked that those who are not speaking keep their microphones muted.

Joe Mulligan (GSA) welcomed new participants Todd Satter, a historic preservation specialist with GSA, and Dan Speicher, a member of Jacobs team and a participant in the meeting presentation.

Joe introduced Nicky Emery, GSA's preservation architect, who outlined the agenda for the meeting including final discussion of the identified historic properties and finding of effects. Nicky emphasized the linear nature of the Section 106 process and the legal responsibility of GSA to carry out the process in an orderly fashion. She thanked the consulting parties for their patience while GSA worked through each step of the process. She shared that Lori would give a presentation on programmatic agreements (one of the next steps in the Section 106 process) and a second presentation on the upcoming charrettes.

Next, Joe introduced Lori Price (Jacobs) who provided a recap of the finding of effects, which were shared at past meetings. Lori referred to the link to the draft report that was emailed to each of the consulting parties and said that it had also been sent to the Illinois State Historic Preservation Office (SHPO) for concurrence on the determinations of eligibility and finding of effect. Then Lori talked about the content of the report and how it includes the information that was presented at past meetings as well as additional information related to comments received from the consulting parties at the meetings or through other correspondence. The additional information details how findings of effect were analyzed for individual buildings, particularly including the height of taller buildings with more expansive viewsheds, and more clearly explains the historic significance of properties (why they are eligible for the NRHP) and how or if that significance will be affected by each action alternative. Lori emphasized that despite the additional information, the finding of an adverse effect for both action alternatives (viable adaptive reuse and demolition) did not change.

Lori briefly discussed the absence of known archaeological resources in the area of potential effect (APE) and how the only case in which potential archaeological resources might be disturbed is if one of the alternatives required removing or altering the basement or foundation of one or more of the buildings. Lori assured the consulting parties that if such action becomes a part of the undertaking an unanticipated discovery plan with monitoring will be put in place to minimize any possible effects.

Lori then shared a slide with next steps, 1. concurrence from SHPO on the determination of eligibility and finding of effect and 2. resolving the adverse effect of the undertaking through an agreement document. Lori presented a slide with an outline of the Section 106 process and indicated that with the completion of the draft architectural report, the GSA has now completed step two, identify history properties, and step three, assess the effects of the undertaking on those properties. Lori explained that because GSA determined the undertaking to have an adverse effect, the next step in the Section 106 process is to resolve the adverse effect through an agreement document. The agreement document may be a memorandum of understanding (MOU) or a programmatic agreement (PA). GSA selected a programmatic agreement (PA) for this undertaking. 36 CFR 800.14 allows for PAs when effects on historic properties cannot be fully determined prior to approval of an undertaking. As an example, Lori explained that if viable reuse is selected, then GSA will issue a request for proposals (RFP) as a means



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of identifying entities and gathering proposals for the reuse of the buildings. The result of the RFP will help determine whether reuse of the buildings is feasible and what that use might be. At this point, however, the final result of the undertaking is still unknown and for that reason GSA selected the PA as the best method for addressing adverse effects once they are known.

Lori shared a slide with a flow chart showing the relationship between the PA (part of Section 106) and National Environmental Policy Act (NEPA) processes and how those processes can be aligned and carried out simultaneously. She added that the PA will provide paths forward for both action alternatives and explained that while it is being drafted, GSA will continue the consultation process and host charrette-style workshops, which are intended to explore viable adaptive reuses and design options. GSA plans to issue a request for interest (RFI) to see if there is market interest in the undertaking. The RFI will be open for a period of 60-90 days. Response to the RFI, as well as the information presented in the environmental impact statement (EIS) and the results of the Emax study, will aid GSA in selecting a preferred alternative. Once this occurs, GSA will issue a final EIS (FEIS). Ideally, GSA will complete and execute the PA around the same time. Once the FEIS is issued (and a period of 30 days has passed) and the PA is executed, GSA will issue a record of decision (ROD, part of NEPA process). If the viable reuse alternative is selected, the ROD will be followed by an RFP so that interested parties can respond with proposals for viable reuse projects that their firm or organization is interested in pursuing.

Lori brought up a question raised at past meetings regarding why the PA can't be put on hold until a preferred alternative is selected. She explained that if the PA is not written and executed by the time the FEIS is issued, it will delay issuing the ROD and add several months to the project schedule. Currently, the hope is to complete the PA by early 2024. Lori further explained that even if GSA waited to draft the PA after issuing the FEIS, it would still lack final details about the undertaking.

Lori resumed her discussion of what a PA is and how it will provide paths forward for both the demolition and viable adaptive reuse alternatives. For example, it could stipulate measures to avoid, minimize, or mitigate adverse effects or it could provide a general process that GSA agrees to follow with the understanding that it will be amended once GSA makes a final decision and has final details. In the case of viable reuse, the amendments may relate to negotiations with the party selected to reuse the buildings. Lori then explained that a PA is a legally binding agreement between the signatories, in this case GSA, Illinois State Historic Preservation Office (SHPO), and the Advisory Council on Historic Preservation (ACHP), and contains three main parts—preamble, stipulations, and administrative. The preamble states the facts, while the stipulations detail the commitments, and the administrative section outlines the agreement itself, such as how long the agreement lasts and how to make amendments. Lori provided a link to a page on the ACHP's website that provides guidance for drafting Section 106 agreements: https://www.achp.gov/drafting_section_106_agreements.

Lori stated that the GSA, SHPO, and ACHP will draft the PA based on the information gained from the consultation process and then share it with the consulting parties for comments and suggestions. This process will be repeated until a final draft is complete, likely in early 2024. At that time, the consulting parties will be invited to sign as invited signatories or as a concurring party. Lori emphasized that being invited to sign does not mean that you have to sign.

Lori handed the presentation over to Mariah McGunigle, GSA's regional chief architect for the Great Lakes region, and Dan Speicher. Mariah began by introducing herself and outlining her time with the GSA—14 years as a preservation architect and one year in her current role as regional chief architect. She spoke about how her background in historic preservation helps inform her work as chief architect and how she understands the role that historic buildings play in providing identity, a sense of place, and community, and how it's clear to GSA that the consulting parties really value the subject buildings.

She then discussed how over the past few months a GSA team has been working with a facilitation team from Jacobs to develop a Charrette that will respond to the feedback collected during the consultation process. She defined a Charette as a process methodology that brings experts and stakeholders together



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to create plausible solutions, and, in this case, to generate a viable reuse or set of alternatives other than demolition. Mariah then emphasized that for the charrettes to be successful it will require GSA and the consulting parties to bring together the best team of thought leaders and for them to be actively engaged in the process. In addition to the previously collected information, the charrettes will involve rethinking the site, revisiting prior assumptions to identify problem-solving solutions, and engaging the market.

Mariah then outlined what type of thought leaders are needed and some that GSA has spoken to and will be in attendance. Ideally, these should be advanced subject matter experts in the field of historic preservation, cultural resources, adaptive reuse, and people with an in-depth understanding of Chicago's urban fabric and community. She emphasized that these types of people are all represented by the collection of consulting parties and their importance to the process. The GSA team has also assembled a list of highly regarded, innovative design professionals (peers) from outside of GSA that have experience in community engagement, sustainability, and historic preservation. These include: Carol Ross Barney, the current AIA Gold Award Winner; Studio Gang; Doug Farr; the adaptive reuse team from Gensler; and Amy Gilbertson from Trivers.

Mariah reiterated that for the charrette to be successful it will require engaging in a meaningful and iterative process and should put all ideas back on the table in order to test the limits of the current parameters (viable reuse and security requirements). As such, it will look at holistic, plausible solutions for reuse, reexamine previous assumptions (i.e., uses that were assumed unfeasible), and explore alternative solutions. She emphasized this point in relation to questions and concerns raised by various consulting parties as to why those uses are not being considered.

Mariah outlined the charrette as three collaborative sessions:

1. Investigating options for site interventions and zones of use
2. Determining programming - what will happen within the buildings and site
3. Incorporating input from market stakeholders

Mariah concluded, reiterating that the security and safety of human life is the ultimate goal of the United States Marshals Service and the United States Courts and ensuring the consulting parties that the charrette will carefully examine the restrictions and seek creative alternatives to demolition.

Mariah introduced Dan who presented a table with details about the theme, timing, description, and desired output of each charrette as well as a more in-depth details about Charrette #1. Dan highlighted the theme and timing of each charrette: Charrette #1 (late September), Categorized Ideas; Charrette #2 (mid-October), Possible Ideas; and Charrette #3 (early November), Probable Preference(s). He later emphasized that each charrette will be four to five hours.

Dan shared that Charrette #1 will focus on categorizing or grouping similar ideas to test assumptions about them in an efficient manner, rather than one by one. He added that a goal of the session will be to think of all possible or potentially possible ideas including those that have already been proposed, as well as new ideas and ideas that may not be as obvious. The output will be four to eight categories of reuse ideas.

Dan said that Charrette #2 will draw from the first charrette through an in-depth discussion/evaluation of the categories and narrowing it down to a refined list of two to four of the most possible reuse categories. This will give the participants an opportunity to put more energy and time into the categories that are most likely to produce probable reuses. He shared that Charrette #3 will focus on the opportunities and obstacles of the most probable reuses as viable alternatives to demolition.

Next, Dan provided more detail about Charrette #1 and its objectives. This includes making sure the participants understand the approach, output, and mechanics of the process as well as their roles and how they can best contribute to the final output. An additional objective is providing an understanding of the existing constraints, such as baseline conditions and the viable reuse criteria, while also reevaluating



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these constraints and identifying opportunities to work within them while still producing a positive outcome. Final objectives include engaging the consulting parties and peers and building trust between everyone involved. Dan emphasized the importance of the final outcome, stressing that even if the process ends with a great result, if it is done in a way that does not include collaboration, understanding, or recognition, it doesn't meet the results that need to be achieved together.

Dan outlined the agenda of Charrette #1, which follows closely with the objectives and includes:

Peer Initiation – inform peers of current ideas, constraints, and opportunities; allow them to draw, conceptualize, and document the information they are receiving as well as their thoughts; and use their knowledge to identify reuse categories.

Charrette Approach- provide clarity on the flow, intentions, roles, criteria (what is used to make decisions, recognition, or determine preferences), and other grounding knowledge.

Breakout Sessions-engage with each other in small teams, pick an idea or element of the undertaking and thoroughly and creatively evaluate it. These will allow for greater ideation, development, and conceptualization. Dan added that by incorporating small group sessions, people have more opportunities to be involved and provide input, which produces a richer environment for sharing ideas and often produces ideas that would not otherwise be voiced.

Review and Preference-categorize the proposed ideas into smaller groupings so that they can be better grasped and compared collectively rather than individually. Review and provide feedback on preferred categories.

Next Steps-how Charrette #1 will be documented and what to expect from Charrette #2.

Dan then asked if Mariah would like to add any other information or if it would be appropriate to open the meeting to questions from the consulting parties. Mariah deferred to Joe who was monitoring the chat for questions. Joe first addressed questions from the chat regarding when an overview of the programmatic agreement and the findings of effect will be provided and said that those questions will be addressed at the end of the meeting. He then addressed questions about the chat beginning with a question from Kevin Harrington (Mies van der Rohe Society, Illinois Institute of Technology) about how many of the charrette team (peers) identified are in the current meeting. Joe responded that they are not in attendance. Mariah confirmed Joe's answer and Joe explained that the peers are being updated on the undertaking and feedback from the consulting parties separately. Mariah emphasized that the charrette team includes all of the consulting parties as well as the peers.

The next question addressed from the chat regarded the identification of design professionals. Mariah responded that if there are any other professionals that a consulting party would like to see included, they can certainly be invited. She again emphasized the collaborative nature of the process and invited the consulting parties to suggest people for the market discussions as well. She mentioned engaging people in different ways, and that suggestions of interested parties could be useful once an RFI is produced, as well as looping them into the conversation now.

Kendra Prazen (Landmarks Illinois) asked if the charrette will include considerations of modifications to Dirksen Courthouse. Joe answered yes, and that testing other previous assumptions will be part of the charrette too.

Joe pointed out that some names were submitted in the chat. He also mentioned recommendations from Cindy Roubik of professionals that previously worked with the City's Department of Planning and Development and that those were forwarded to the charrette planning team. He shared that GSA has met



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with several of the organizations identified and has been seeking peers in other ways as well, such as through the Emax study reaching out to financial industry experts.

Ward was invited to speak next. He thanked Mariah for her input and the clarity she provided. He then brought up the quick pace of the charrette process and desire for the ROD to be completed so soon. He shared his desire for the schedule to be extended, particularly in relation to the close proximity and overlap of the charrette dates with upcoming holidays, Commission on Chicago Landmark meetings, and preservation conferences. He then asked if there will be any developers, specifically preservation sensitive developers, at the charrettes and pointed out that Kevin mentioned Gunny Harboe, a preservation architect based in Chicago, who is well known around the world would be a good addition to the charrette.

Dan responded that yes, developers are part of the team and are particularly important for the second and third charrettes. He also pointed to the chat where Angela Miklich (GSA) added a list of the team collaborators.

Dan then emphasized the importance of collaboration and using the roles and expertise of all the parties involved (consulting parties and peers) to reach a final result. He mentioned as well that though the charrette team is seeking professionals to fulfill the role of peers, that many of the consulting parties are represented by professionals in the historic preservation field as well, including many architects, and that each person should bring their expertise to the table as well. He added that those like him who are consultants (not consulting parties) have their own experience in this area, but that they will act as facilitators and help guide the participants through the process, and that GSA will participate as listeners, while the consulting parties and peers formulate the ideas and concepts.

Dan asked Mariah if she wanted to respond to any part of Ward's comments. She responded agreeing that Gunny Harboe would be a great addition and shared that GSA has worked with him before. She then explained that the dates chosen were based on the schedules of the different peers and the availability of space to host the event but said that they could explore other dates. Joe mentioned that GSA is sending out save the date invitations and that they can gauge the responses to see if they work for most people. He also mentioned a hybrid option that, while not preferred, may provide an opportunity for those who cannot make the meeting in person to participate. He made a note to ask the charrette team to review those options.

Brad White (Individual) asked for clarification on the response to Kendra's question about security modifications to the Dirksen Courthouse. Joe responded that they plan to test past assumptions and other details that were evaluated previously. He also mentioned that the courthouse is listed in the NRHP, which has to be taken into consideration if it is to be modified. Joe emphasized, however, that GSA wants to hear the ideas and possible solutions generated at the charrette so they will have as many options for viable reuse as they can.

Mark Buechel (NPS) spoke about receiving a letter from the ACHP expressing concerns about how the Section 106 process is being carried out and the charrettes being rushed. He asked if GSA has thought about the dates and how the first one is two days before the end of the fiscal year for the federal government, which precludes any federal employees from being able to travel to the event. He also brought up the possibility for a government shut down and how that could affect the process. Joe thanked Mark and shared his understanding of the situation. He said that they are planning to have a hybrid option. Joe pointed out that in the chat Eilish Tuffy (City of Chicago, Department of Planning and Development) commented that the September date also conflicted with a consulting parties meeting for another undertaking. Joe responded that GSA would review the first date and asked those who received the save the date to respond with whether or not they can attend.

Brad thanked GSA for the emphasis on collaboration made during this meeting but pointed to the dates selected for the charrette as an example of the lack of collaboration thus far. He then asked for clarity on



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whether there is now more flexibility in the security parameters. Mariah responded that security is still the biggest priority and that though ideas and uses are being reevaluated in hopes of identifying solutions, but the process will not be easy. Joe added that a few of the parameters do represent significant challenges including the need for security and the need for capital to rehabilitate the buildings. He reminded the consulting parties of the presentation on outleasing options, and the tools GSA has to work with. He said that the GSA's goal for the charrette is to establish a spectrum of possibilities and then discuss them to see how they might overcome those challenges.

Brad asked whether ideas produced during the charrette will then be rejected by the court system/security and Joe responded that those individuals will be there to collaborate and respond to those concerns as well. Mariah added that part of the charrette will be talking through security parameters and making sure the proposed reuses address them. In terms of previous ideas that were rejected, reevaluating them may result in really strong solutions to the concerns that previously made them unsuitable. Mariah also said that the charrette team has talked about having sessions in between the charrettes so they can discuss and finesse ideas or concerns that arise and better address them at the next charrette. Lastly, she expressed the desire to have a peer involved that has a security background to add even more insight and asked if anyone had a suggestion to contact her.

Brad asked if there will be a written response to the ACHP letter or the letter he sent. Joe responded that GSA responded to Brad's letter through email roughly a week ago and that a response to the ACHP letter was being drafted. He shared that GSA also received a letter from Ward and that they talked with him yesterday to let him know that they would not have a response to him before this meeting.

Joe returned to the previous topic of security and said that federal law enforcement agencies and United States courts are consulting parties and regular attendees of the consulting party meetings. He added that they are invited to the charrettes as well and that GSA has received confirmation that the court architects are attending the charrettes as observers.

Mariah responded to a comment from Kevin about having someone at the charrette with the knowledge and authority to talk about security issues and said that in addition to looking for a person to do that, that many of the peers have also worked with GSA in the past and have experience working with federal security requirements. Many of them have already started asking questions about the security parameters and thinking about solutions. Joe mentioned that Carol Ross Barney is one of the peers that has experience with federal projects. He also offered to send more information about the credentials of the peers and their work on federal projects with the meeting minutes.

Next, Ward talked about previous questions related to "hardening" the Dirksen Courthouse and how a few years ago there were discussions about replacing the metal screens around part of the Mies plaza with ballistic glass. He also pointed to the participation of Dirk Lohan (AIA) in the consultation process and his experience working on the building with his grandfather, Mies van der Rohe. Ward asked about the possibility of adding ballistic glass to the inside of the most sensitive portions of the courthouse, panels that would be inside the curtain wall. He also suggested that Dirk, or someone like him, be a facilitator (peer) and look for ways to harden and secure the building.

Mariah agreed with Ward and said that those were all ideas that should be included in the charrette discussions. She also agreed on the note of Dirk's participation.

Dirk spoke and expressed his willingness to be a part of the charrette team. He also shared that in addition to working on the Chicago Federal Center, he has more recently redesigned the FBI building on West Roosevelt Road in Chicago, which already had federal security requirements incorporated, and has worked on federal buildings in Detroit and other cities for the GSA. He added that he has already been thinking about how the curtain wall and windows of the courthouse can be modified and spoken to others about the idea as well.



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Dan and Mariah thanked him for sharing and encouraged his participation in the charrettes.

Dan pointed to some other comments in the chat about when additional information will be shared. He answered that the first charrette will focus on everything that has been produced so far. This information will serve as the foundation for the conversation. He told the consulting parties that most of the information will be provided graphically instead of as large written reports or material to read at the charrette, though some information may be sent out beforehand. Mariah added that the Jacobs team has prepared some great diagrams and that she thinks they will be really helpful. She also thanked the consulting parties for the information they pulled together and the Jacobs team for distilling that information in a very understandable way. She said the peer groups have responded very positively to the information and commented on the work and effort that was put into it.

Laura Lavernia (ACHP) thanked everyone for participating and emphasized to the GSA that everyone here is ready and willing to collaborate. She encouraged the courthouse architects and members of other federal agencies that work with GSA and are consulting parties to actively participate in the charrettes so that the consulting parties can better understand their decision-making process. She concluded by thanking the presenters for opening the dialogue more.

Mariah thanked Laura and said that she hopes to continue to open up the dialogue through collaboration.

Mariah also responded to a question about proposals submitted prior to the charrette saying that there were none that she was aware of at this time and that the charrette will start those conversations. She said GSA is looking to start exploring those ideas then but added that if there are particular ideas to let her know.

Mary Lu Seidel (Preservation Chicago) specified that the question related to the homework assigned at a previous meeting, which asked the consulting parties to propose adaptive reuse ideas and send them to GSA. Ward brought up the proposal for the Chicago Collaborative Archive Center and how it is moving forward with several archives from the Franciscan Men and Women moving into the West Monroe Building in Chicago in anticipation of the possibility of the Century and Consumers Buildings being reused as a collaborative archive and that Dominican University has expressed interest in having a satellite program in one of the buildings for their archives and library sciences division. He also noted that these uses would add to the current creative educational institutions already in downtown Chicago.

Dan responded positively before making some final statements. He stressed the importance of collaboration and asked the consulting parties to hold GSA and the facilitators accountable, to ask questions, and to share thoughts, ideas, and perspectives verbally as well as in writing. He also acknowledged the conversation during the meeting and the message that to be successful GSA and the facilitators have to listen to the collective group.

Mariah spoke next, sharing that she was looking forward to the charrette and her hope that it will be an opportunity to “roll up the sleeves” and get to work trying to solve the obstacles that the undertaking presents. She emphasized the importance of everyone from GSA being engaged as well as the consulting parties and peers. She noted that the peers are ready to start working with the other parties involved and how GSA is doing its best to recalibrate the process and make sure it is successful.

Ward asked about the preliminary landmark status given to the Century and Consumers Buildings by the city and pointed out how that action indicates the importance of the buildings to the City of Chicago. He asked where GSA stands in the landmarks process and what their thoughts are on moving forward in the future? He also shared his hope for a collaborative process in designating the buildings as landmarks.

Joe responded that nothing has changed since the last update and that the process is still in the owner consent phase. GSA requested an extension, which extends through October 23rd, in hopes that the consultation and decision-making process will be closer to choosing a preferred alternative. He said he



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does not anticipate that GSA will consent during this period because of where the NHPA Section 106 consulting process currently stands. He noted that GSA recognizes the differences between the local and federal processes in evaluating historic significance but are following the federal process, however, the federal process has not reached a point where GSA can provide consent. The next step is the public hearing, which is coordinated by the City of Chicago. Ward asked for the date of the public hearing and Joe answered that the date will be determined by the city. Ward asked if GSA will remain neutral during the current process and Joe explained that they can only respond “yes” or “no” and by not responding, the GSA is effectively staying neutral until the end of the federal process.

Joe moved on to other updates beginning with the first charrette being on September 28th. He reminded everyone that they are aware of availability issues and potential conflicts with the second and third charrettes and will review the dates. Other updates included a reminder that the NEPA DEIS is available for public comment—it will be on the Federal Register and EPA's website Friday and is open until October 31st. GSA is reaching out to the public through postcards sent to surrounding properties and newspaper announcements. A public hearing is scheduled for October 2nd, 3-5pm at the Metcalfe Morrison Conference Center. He invited those who cannot attend in person or virtually to email comments. He pointed out that around 16 members of the public attended the last public meeting in person while most attended virtually, and a majority of the comments received by GSA were sent via email. Currently many comments are being received via email as well.

Joe gave an update on 208-212 South State Street including a photo of the site and shared that it is being graded and will soon be landscaped. He pointed out the elevations of the adjacent State Street buildings and Berghoff building and the care that was taken in preserving those elements while demolishing the building. As for the fire escape removal and parapet stabilization project for 202 South State Street, Joe shared that the scope for construction services was awarded in August and GSA is currently reviewing submittals, which includes historic treatment and safety plans as well as plans for how the project will be executed and coordinated. GSA will also coordinate with the city, the ward, the planning and development department, and other departments in anticipation of restrictions for public access. There is no tentative date for beginning construction.

The last update Joe shared was the tentative date for the next consulting parties meeting: October 26th.

Holly Fiedler (Franciscan Central Archive; Chicago Collaborative Archive Center) asked if the October 2nd event will have a virtual option and Joe assured her that it will. Carla shared a weblink to register for the event on Eventbrite.

Carol Wallace (SHPO) shared a question from Anthony due to Anthony having microphone issues. Anthony wanted to know if GSA had a location for the first charrette. Joe and Mariah responded that the first charrette will be at the GSA Regional Office at 230 South Dearborn Street but the second and third charrettes may be elsewhere. Carol asked how people can RSVP for the charrettes and Joe responded that save the dates were sent as meeting notifications. Carol asked for it to be resent and Carla agreed to do so.

Dan brought up a question in the chat about a virtual component to the charrettes and confirmed that there will be a virtual option. However, he encouraged people to come in person, even if they can only be there for part of the time. He emphasized that the experience will be greatly enhanced by attending in person versus attending virtually.

Nicky responded to a question from Anthony in the chat about the fire escape removal and parapet stabilization project, as well as subsequent projects at the site. She assured him that GSA understands that 214 South State Street was found eligible as a contributing element to the historic district, and said that it is also incorporated in the DEIS and the effects findings. Nicky also reminded everyone that GSA coordinated the removal of the fire escape and stabilization of the parapet with SHPO and the decorative portions of the fire escape railings and any decorative terra cotta tiles that are removed will be carefully



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crated, labeled, and stored so they can potentially be reinstalled. She clarified that the fire escape will not be reinstalled, but its elements could be used in some way. Also, if terracotta tiles can not be reinstalled, new tiles can be created from the removed tiles. Joe added that the charrette covers the whole site of the undertaking including 208-212 South State Street as a landscaped space and 214 South State Street.

As a final update, Joe shared that the historic report is being reviewed by SHPO and asked for the consulting parties to review the document as well and submit comments to GSA through the State Street email address no later than Wednesday, September 27.

Nicky pointed out an unanswered question in the chat and asked Lori if she could answer it. The question asked about the finding of no adverse effect for the no action alternative. Lori answered that because the no action alternative does not include any action from the federal government other than continuing to secure and maintain the buildings in the same way that they have been, then there is effectively no federal action to trigger an adverse effect.

Brad pointed out the deterioration of the buildings since GSA took ownership and asked how continued deferred maintenance can be categorized as no adverse effect? Lori responded that the GSA does address maintenance and safety issues of the buildings each year to the best of their ability. Under no action, the buildings will not be demolished, and the only action will be to address maintenance and security issues. Brad asked if this was due to the Section 106 definition of a federal action and Lori chose not to directly answer because of the question's legal nature but responded that she operates within the confines of Section 106 regulations and its definitions to make determinations. Brad asked more specifically if no action is taken, if it means there is no adverse effect. Lori said that in that scenario, there is no undertaking and Brad asked if there is an undertaking in this project. Lori pointed to the report and said the undertaking is defined as addressing security issues, dealing with the federal government appropriations, and managing assets. Joe summarized the undertaking as "broadly the future of these properties" in regard to those components. Brad responded that since there is an undertaking, he couldn't understand how no action is not an adverse effect. He then suggested the conversation move on to other matters.

Lori thanked him for his thoughts.

Mary Lu spoke to reiterate Brad's comment by pointing out that in the assessment of impact it states that doing nothing (not demolishing or redeveloping the properties) will not have an adverse effect, but for the period that GSA has owned the properties, this approach has had an adverse effect. Mary Lu stated that she will object to this point until it is changed in the report. Also commented on what a building assessment report might be in 10 years if things stay the same.

Joe acknowledged Mary Lu's comment and said GSA would review it in greater detail. He brought up the SHPO review and assured the consulting parties that GSA would collaborate with the SHPO and ACHP on that finding.

Christopher Koeppel from the ACHP spoke and expressed the ACHP's concerns about the no action alternative, particularly the cessation, pauses, and draw downs of maintenance, and how those actions do constitute adverse effects. He pointed out that there are precedents, former agreements, where maintenance issues have been found to be adverse and can be construed as negligence. Lori responded that there is no cessation, pause, or drawing down of maintenance. She reiterated that no action means no change and that maintenance will continue with the same amount of funding allocated to the building annually. Joe shared that that amount is approximately \$800,000 every two to three years for façade maintenance and other miscellaneous items.

Lori reiterated that GSA is not doing nothing and is not ceasing to maintain the properties, but they will continue to maintain and secure the properties. Brad and Mary Lu stated that they were not insinuating that GSA hasn't done anything but emphasizing the term "no action". Mary Lu clarified that "no action" is a



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Section 106 term and means that a property is not demolished and not rehabilitated. She added that GSA is doing something, but it is not doing enough due to the availability of funding. Mary Lu stated her objection to GSA owning vacant buildings that they can't maintain. Brad agreed that GSA is doing something but reiterated that the buildings are still deteriorating and will continue to deteriorate. He also pointed out that \$800,000 is not a lot of funding, particularly over multiple years.

Joe and Lori were understanding, and Lori clarified that she was more directly responding to Christopher's comments and making sure everyone understood that maintenance would continue. Joe also pointed out that multiple people were sharing feedback in the chat as well and Lori was responding to those comments, not just those of Brad and Mary Lu.

Christopher thanked Lori for making this point clear and Joe apologized for the confusion and agreed with Mary Lu's summarization of the no action alternative.

Joe asked for additional questions or thoughts, and with none provided he thanked everyone for their attendance and participation and adjourned the meeting.



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NHPA Section 106 Consulting Parties Meeting #8 (Charrette #1)

September 28, 2023

Refer to the Charrette #1 Summary within the State Street Properties Charrette Process report posted on the GSA Great Lakes Region 5 website.



Minutes

Attendees (sorted alphabetically):

| | |
|--|-----------|
| Beth Savage – GSA | Virtual |
| Brad White – Consulting as an Individual | In person |
| Brie Martin – Franciscan Friars Archive, Our Lady of Guadalupe Province | In person |
| Charlie Webb – Jacobs | In person |
| Christopher Cody – NTHP | Virtual |
| Christopher Koeppel – ACHP | Virtual |
| Dirk Lohan – AIA | In person |
| Greg Rainka – Commonwealth (Jacobs team) | In person |
| Holly Fiedler – Franciscan Central Archive; Chicago Collaborative Archive Center | In person |
| Jaime Loichinger – ACHP | Virtual |
| Jeffrey Jensen – GSA | Virtual |
| Joan Pomaranc – AIA Chicago | Virtual |
| Joe Mulligan - GSA | In person |
| Kandelyn Hahn – City of Chicago | In person |
| Keira Unterzuber – Administrative Office of the U.S. Courts | Virtual |
| Kendra Parzen – Landmarks Illinois | In person |
| Kevin Harrington – Mies van der Rohe Society, Illinois Institute of Technology | In person |
| LaDon Reynolds – Chief Marshal, USMS, Northern District of Illinois | Virtual |
| Logan York – Miami Nation | Virtual |
| Lori Durio Price – Jacobs | In person |
| Mariah McGunigle – GSA | Virtual |
| Mark T. Buechel – NPS | Virtual |
| Marla Kavouras – GSA | Virtual |
| Megan Funk – Commonwealth (Jacobs team) | Virtual |
| Mary Lu Seidel | In person |
| Michael Edwards – Chicago Loop Alliance | Virtual |
| Michael Gonczar – GSA | Virtual |
| Michael Woods-Hawkins - US Marshals | Virtual |
| Nicky Emery – GSA | Virtual |
| Patrick Grossi – Preservation Chicago | In person |
| Regina Nally – GSA | In person |
| Sarah Schrup – US Courts of Appeals for the Seventh Circuit | Virtual |
| Shannon Roberts – Jacobs | In person |
| Sofia Becker – Jacobs | In person |
| Tom Bruton – US District Court, Northern District of Illinois | In person |
| Ward Miller – Preservation Chicago | In person |



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Joe Mulligan (GSA) opened the meeting by outlining the agenda and goals of the meeting and introducing the presenters. He shared that following this meeting consulting parties can provide additional comments on the draft programmatic agreement (PA) until March 1st. Once the comments are received, a second draft will be shared with the parties in mid-March, a third draft in mid-April, and a final draft by the end of April.

Charlie Webb (Jacobs) was the first presenter. He gave a summary of the comments received concerning the environmental impact statement (EIS). These comments include written and verbal comments collected at the public hearing in mid-September as well as comments received during the comment period, which lasted from the meeting through October 31st. He shared that 530 verbal and written comments were received, including 134 unique comments and 396 form letters. The majority of the comments urged GSA not to select the demolition alternative but to choose the adaptive reuse alternative. Other comments addressed the security of the courthouse and other options to improve security, environmental impacts of demolition, adaptive reuse criteria being too restrictive, and Chicago landmark designation. GSA's responses to all of the comments will be included in the Final EIS, which will be issued this Spring and available to the public on GSA's website. Ward asked in which month the Final EIS would be issued. Joe responded it would likely be in April/May.

Next, Mariah McGunigle (GSA) provided a recap of Charrette 2. She thanked the consulting parties for their participation in the charrette, including commentary and outreach to the market community. She then introduced Shannon Roberts (Jacobs).

Shannon recapped that Charrette 2 included nearly 90 participants and its goal was to collect insight from developers and investors as well as to characterize reuse opportunities. Feedback was collected in four categories: initial concepts, funding and financing, security and risk, and regulatory and market. One hundred twenty two individual comments were received. The comments were split about 50/50 between adaptive reuse being "more challenging" and "more opportunity." Most comments were related to concerns around the security requirements. The charrette provided four primary conclusions: the best opportunity is in residential and government leased offices; the market can finance market-driven reuses; there is a strong desire for the security criteria to be reconsidered and revised from being prescriptive to performance based; and regulatory requirements can be overcome.

Mariah spoke about Charrette 1 and how it provided ideas, but also that more input was needed from the market and market leaders. This led to the development and focus of Charrette 2. Mariah elaborated on Shannon's presentation and how Charrette 2 identified clear reuse options and provided current market information. She also addressed the residential option and how it is not a permitted use due to the security criteria, and how information from market leaders strongly encourages the use of performance metrics over the current prescriptive criteria. She concluded that based on the amount of information gained from Charrettes 1 and 2, there does not appear to be a need for a third charrette at this time.

Brad White asked about the security criteria and performance metrics, specifically if they are separate from one another. Joe explained that they are separate and that the feedback from the market is being taken into consideration by GSA and other stakeholders to see if there are opportunities to incorporate performance metrics. Additionally, they are reviewing the original reasons for the security criteria to better substantiate them.



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Brad asked about the status of a study to harden the Federal Center. Joe explained that risk assessments are completed periodically and on an ongoing basis, and that one is currently being conducted for the Federal Center. The assessment, however, is not a part of this process, but will be used later to inform GSA decisions.

Dirk Lohan reiterated Brad's point and said that at Charrette 2, people talked about how hardening the courthouse would solve many of the security issues. He noted that logically, hardening the courthouse should be addressed before addressing the State Street buildings, not after, and that people who have experience in security shared with him that hardening the courthouse could be easily accomplished and would allow more flexibility in the reuse of the buildings.

Joe explained that the security of the courthouse is being addressed currently and is a part of the discussions concerning the State Street buildings. He also noted difficulty of implementation, cost and architectural considerations as additional factors.

Ward Miller (Preservation Chicago) and Brad spoke about how the proposal to reuse the buildings as an archives center was not included in the recap of reuse ideas identified by the charrettes. Brad also expressed concern that the idea was being diminished because less people commented on it. Shannon and Mariah explained that the presentation today focused on the overall feedback, a large majority of which addressed the viability of residential and government office use. Mariah and Joe assured them that the archives proposal and other uses of the building are still options. Joe added that a report documenting the charrettes is being drafted and will include all the ideas presented. He also pointed out that government and residential uses rose to the top of the discussion because having a government use fits the adaptive reuse criteria and because currently most buildings in the central business district are being considered for residential use over other uses.

An attendee spoke about the need for temporary long-term housing for federal government employees that have security clearance and how this use could successfully combine government and residential uses while still satisfying security concerns. Joe said that GSA looked at this possibility and that it would fall under the government use category. He added that when GSA reached out to other agencies about their needs, none responded with the need for government housing.

Lori provided an update on the Section 106 process and that GSA and the consulting parties have reached the final step, resolving adverse effects. She explained that the adverse effects will be resolved through the Programmatic Agreement, or PA, the first draft of which was shared with the consulting parties electronically and includes possible mitigation ideas. Lori also explained why a PA was chosen over a Memorandum of Agreement (MOA) and how it will address the different alternatives so that once one is selected, the PA's provisions for that alternative can be implemented. This draft has been reviewed by the Illinois SHPO and the ACHP, and their comments have been incorporated.

Lori said that as a part of this presentation she would share the draft PA on the presentation screen and meeting attendees could go over it with her and make suggestions. She added that if anyone would like to review the draft PA later and send comments that they have until March 1st to do so.

Lori shared a slide showing the alignment of the PA and NEPA and a timeline of next steps. Currently, the PA is a working draft. GSA expects to complete the PA in May 2024. The Final EIS, which will announce GSA's preferred alternative, may be issued before or after the PA is signed; timing is not certain. GSA's record of decision (ROD) will be issued after the PA is signed, and GSA will move forward with the stipulations of the PA.



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Lori provided additional insight on the PA, including that it is a legally binding agreement between federal agencies, in this case GSA, SHPO, and ACHP (Signatories), as well as any parties that have responsibilities under the PA (Invited Signatories). In addition to the federal agencies and invited signatories, the concurring parties may sign to indicate their concurrence with the document and participation in the Section 106 process.

Before reviewing the current draft, Lori outlined the parts of the PA and provided a link to the ACHP's "Guidance on Agreement Documents."

Brad asked about the relationship between the PA/agreement document and Section 106, as well as the overall relationship of the documents and eventual mitigation efforts. Lori explained that the PA is part of Section 106 and that it was chosen over a MOA due to the outcome of this undertaking being unknown. In scenarios where there is only one outcome, a MOA can be used in place of a PA. Lori further explained that before the ROD can be issued, Section 106 consultation must be complete, which requires a signed agreement document. Once the ROD is issued, GSA will go forward with the preferred alternative and there will be additional consultation on the specifics of the mitigation. Regina reiterated the NEPA/Section 106 alignment and how Section 106 consultation must be completed before NEPA can be completed. One reason for this is so that the information gained from Section 106 consultation can inform decision makers of the mitigation measures agreed to for each alternative.

An attendee noted that the courts were not listed as signatories for the PA and asked if the GSA fully represents the occupants of the courthouse or who the decision maker is since the security of the courthouse is the reason for many of the adaptive reuse criteria. He expressed concern over not seeing a representative of the courts and whether, after the consultation process is complete, the courts will agree with the decision made. Lori pointed out that GSA is the lead federal agency and Regina explained that the occupants of the courthouse are GSA's tenants, and that GSA will have additional conversations with the tenants throughout the decision-making process in order to make an informed decision. Joe added that there are many factors, including security, historic preservation, the federal asset portfolio, and urban planning and that all the activities done to date (NEPA, Section 106, charrettes, etc.) are being conducted to inform GSA's decision maker as well as the federal stakeholders. Joe further explained GSA is the lead federal agency for this undertaking and how the PA does not require the courts to implement an activity under the agreement. As an example, Lori added that if the PA stipulates a particular action for the City of Chicago, the city will be invited to sign the PA. This is because you can't mandate an entity to do something if they haven't agreed to it.

Brad asked if the PA will include language that if the building is rehabilitated, plans will be reviewed by a certain entity and Lori told him he was correct.

Lori continued her presentation on the PA, stating that it will include mitigation measures and a path forward for both alternatives. The PA is set up to allow the details of the mitigation measures to develop as the details of the selected alternative develop. This allows for some adaptation since the specific details of both alternatives are unknown at this point.

Christopher Koepfel (ACHP) added that the two paths forward will be structured in the PA so that once the PA is implemented, the selected path can be further developed with input and consultation from signatories and particular parties. The information in the PA will inform not only which path is taken, but also how that path is laid out.



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Following a break, Lori shared the draft PA on the presentation screen. She reminded participants that they can comment now or send comments to the GSA team (via the State Street email address) before March 1st. Review of the draft PA began with the preamble.

Brad requested that the fourth whereas clause on page two be expanded to include more background about why the City of Chicago withdrew from the redevelopment agreement. Some conversation ensued about how that is documented, and Joe mentioned the letter from the mayor withdrawing their participation, citing not being able to overcome the security concerns. Regina suggested including that language in the whereas clause. Alternately, Lori invited Brad to provide any additional written documentation so that it can be referenced in the clause.

Next, the fourth whereas clause on the first page was reviewed. The suggestion was to change the last phrase from "all of which are unoccupied" to "all of which have been unoccupied since federal acquisition." Joe acknowledged that some have been unoccupied since shortly after acquisition and Charlie pointed out that some were already unoccupied when GSA purchased them. Regina suggested providing a date for those that were vacated after GSA's acquisition.

An attendee suggested that more clarity be added to the seventh whereas clause on page one, which discusses "exhaustive reuse feasibility studies," particularly in regard to what the studies were and how many there were. Regina gave some background on the types of studies and why they did not go forward, and Charlie noted that all of the studies are listed in Section 1.2.2 of the draft EIS, which he shared with the commenter. Regina added that previous studies, site plans, etc. were also shared with the peer professionals before the first charrette as background for what was known to be feasible and not feasible.

Ward brought up a meeting from roughly ten years ago where GSA discussed all the buildings on State Street from Jackson to Adams Street. From his recollection, the GSA chose to invest in the Bond Store Building and Benson & Rixon Building as federal office space but chose to pass over the larger, more significant buildings then and at subsequent times as well. He asked if that history could be addressed in the PA.

Joe noted that those properties are outside the parameters of the current PA and Regina pointed out that the meeting Ward is talking about was part of the acquisition of the buildings. Regina agreed to look into adding a whereas clause to memorialize the activity that took place when the properties were acquired and how GSA supported the decision to invest in the Bond Store.

An attendee asked if there is a whereas clause that addressed the security criteria. Lori shared that is at the bottom of page two/top of page three and they are also listed in Attachment A of the PA. Brad asked for a date to be added to the whereas clause noting when the criteria were developed, and Joe added they were linked to the disposal effort.

The first whereas clause on page three was reviewed and Joe explained that while it mentions the 208-212 South State Street lot (site of demolished building), the full site needs to meet the criteria. Lori explained that there is an earlier whereas clause (ninth clause on page two) that provides more information on the empty lot at 208-212 South State Street. This whereas clause was reviewed next, and Mary Lu Seidel (Preservation Chicago) asked why it was not considered historic since it was an older building. She asked if that reasoning, i.e., lack of architectural merit, could be added for more clarity.



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Ward asked if any of the whereas clauses addressed that the Commission on Chicago Landmarks made preliminary and final landmark recommendations for the Consumers and Century Buildings to the Chicago City Council. Lori explained that because it is not a federal action, it is not covered by the whereas clauses. Ward asked if it would be good to note in the clauses since there has been communication between GSA and the city. Lori emphasized that since this is Section 106 and there is already a whereas clause that addresses the buildings as historic properties under Section 106, no additional information on historic status is necessary. Following some additional discussion, Lori made a note to consider adding information that documents the efforts of the Landmark Commission. Regina added that the whereas clauses are intended to memorialize federal actions but that they will discuss further and see what could be done.

Dirk Lohan (AIA) asked why only the subject buildings and not the whole block, from Jackson Boulevard to Adams Street, are being considered as part of this process. Regina explained that GSA has been given direction and funding from Congress to do an action related to the subject buildings, but no authority or funds related to the buildings on the south half of the block. Dirk emphasized the relationship between the two areas and how changes to one will affect the other. Joe and Regina agreed with his point.

An attendee asked for further explanation of the second half of the third whereas clause on page three. Lori pointed to the earlier slide that showed the project schedule and alignment of Section 106 and NEPA and stated that the whereas clause presents the same information but in legal language. She further explained that 36 CFR § 800 and the NHPA state that a federal agency cannot spend funds or approve an undertaking until Section 106 is completed. Joe clarified that the appropriation of funds is different from the expenditure of funds. GSA will not be able to spend any of the funds that it has been appropriated until it has completed the requirements of NEPA and Section 106.

Kevin Harrington suggested adding a summary paragraph that encapsulates the circumstances, views, and conditions of the subject buildings and how they have changed over time. He particularly emphasized the desire for the buildings to be preserved but noted that while this has been the desire of many of the people involved for a long time, it has progressed from optimism when the buildings were acquired by the GSA to deep concern now that nearly 20 years has passed. He expressed appreciation for the detail put into the whereas clauses but suggested this addition as a means of summarizing the efforts that they detail and further emphasizing the desire and goal of the consulting parties to see the buildings preserved.

Joe suggested that this summary might be better for the mitigation section since whereas clauses present factual history. Some discussion of the layout and content of the PA followed. Joe and Lori agreed to make a note and consider the comment. Joe also noted that they will consider where this content might be most suitable, whether that is in the PA, EIS, or another form of documentation.

Holly asked if a note could be added to the whereas clause at the top of page five (originally last whereas clause on page four) that points to the complete charrette report as an attachment. This request was noted in the draft document.

Mark Buechel (NPS) responded to the previous comment concerning adding a summary paragraph and pointed out that regardless of the desired outcome, the consulting parties cannot predetermine the outcome. Rather, the process yields the outcome. He emphasized that the PA is a legally binding document, and no language should be included that compromises its process. Joe and Regina agreed and said they would consult with legal counsel.



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The discussion moved on to the Avoid, Minimize, and Mitigate section of the draft.

Lori outlined the section, which begins with the demolition alternative and covers both complete demolition and partial demolition. She explained that the mitigation measures will be scaled to address the size of the adverse effect, i.e., a larger effect, like demolition of the Consumers and Century Buildings, will require more mitigation than a smaller or less significant effect. She also explained that currently the mitigation measures are written very broadly to allow for more discussion and edits. For instance, salvage is a potential mitigation measure and Lori pointed out things to take into consideration like who would receive the items, could they be used in a public display, etc. She mentioned that Anthony Rubano (IL SHPO) asked for the storefront of 214 South State Street (Roberto's) to be salvaged (if necessary) for display or use at another downtown property that has lost its historic storefront. Lori provided other examples to consider such as HABS documentation and updates to HARGIS, then invited the attendees to comment on the measures that they liked, didn't like, or wanted to see added.

In regard to adaptive reuse, Lori outlined stipulations such as maintaining the buildings and keeping them secure while the redevelopment occurs, ensuring that the lessee adheres to the Secretary of the Interior's standards for rehabilitation, and determining what type of oversight the GSA and other entities will have on the rehabilitation process. After outlining additional areas of mitigation for the consulting parties to discuss, Lori opened the floor for comments.

Mark (NPS) talked about 208-212 South State Street and expressed concern that changes to that space could be adverse. He said that NPS would like to be involved in reviewing design plans and Lori agreed to add them as a reviewer in the document.

Kendra Parzen asked if there is a hierarchy that places the Consumers and Century Buildings as more important than 214 South State Street. Lori pointed to the whereas clauses that explain that. Some conversation ensued about adding additional clarity to the clause, particularly concerning 214 South State Street, and Lori agreed to do so.

The same attendee also asked for mitigation measures to be added to the PA to address the carbon impacts of demolition. She suggested adding the purchasing of carbon offset credits or other environmental mitigation measures to support the climate goals that are listed for Chicago in the 2022 climate action plan. She mentioned that there are other programs that could be included and shared some statistics as well. Joe agreed to review adding this type of mitigation measure.

Another attendee asked about the parameters around the use of the properties if the buildings are demolished. Lori and Joe shared that the whereas clauses include language from the 2022 Consolidated Appropriations Act, which states that it will be landscaped and secured. The attendee asked if additional site conditions could be added in the PA. Joe said that GSA would put additional thought into this request. Ward spoke about 208-212 South State Street and how it has already been landscaped. In his opinion, the landscaping is not appropriate for the site. Regina summarized the point and mentioned bringing the site design back to the consulting parties for discussion. Joe clarified the question and asked if, in the case of demolition, the consulting parties would have a way to be a part of the ensuing design process. He then agreed that GSA would look into including that as part of mitigation.

An attendee asked about Attachment E Mitigation Measures, numbers 8 (Loop Retail Historic District Survey) and 9 (Terra Cotta Buildings Survey), and what the order of operations is, such as surveys done before demolition. Lori explained that those surveys would be done after demolition. She noted that this would be in addition to HABS documentation of the State Street buildings. Lori spoke about the



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current NRHP nomination being out of date and how the terra cotta buildings have never been surveyed as a whole. She emphasized the ability to adapt the structure of the PA to the specific project. Joe added that these efforts will broaden the scope of mitigation beyond the subject buildings. Regina and Lori clarified that the final PA will include timelines and a sunset clause that stipulates the surveys/mitigation measures must be completed by a certain date or point in the process. Regina added that anything that needs to be done before demolition, such as HABS documentation, will happen beforehand, but other mitigation measures, such as surveying the overall Loop Retail Historic District, may be done later.

Ward asked about where the funding for mitigation will come from. Regina answered that leadership will need to be informed of all the items discussed so they know the costs and can agree to carry them out.

Dirk asked who the specific leadership is. Joe responded that it is primarily GSA leadership, and that all of the information produced, including the PA, EIS, and eventually the ROD, will go to GSA's Public Buildings Service (PBS) commissioner for decision making. Ward asked if the judiciary is a decision maker and Joe answered that it is a stakeholder, but as the lead agency, GSA will make the decision.

Kandalyn Hahn (City of Chicago) asked about the Chicago landmarks designation and if the city can have a role in the planning of what happens at the site in the case of adaptive reuse. She offered to provide GSA with more specific information about what the city would like to see added as additional mitigation measures. She also asked if, in the case of demolition, will there ever be buildings on the site in the future. Joe said that it is possible that new buildings could be constructed there, but it is not part of this undertaking.

Joe reiterated that additional comments will be received via the State Street email address through March 1st and that there will be additional meetings in order to continue this conversation. He and Regina thanked everyone for their participation. A slide of next steps and future dates was also shared.

Ward asked if the next meetings will also be in person and Joe shared that they will be a hybrid of in person and virtual. He also asked about the timeline provided and Joe shared that it is intended to keep progress moving forward and that future reviews should relate to final details rather than larger ideas that need to be worked out.

Ward also asked about reuse proposals and if they will be a part of this process and Joe responded that GSA is not looking for proposals at this time. He added that the information gathered from Charrette 2 and other market studies is sufficient at this time and that an RFI may be distributed, but only if GSA decides it needs more information to make an informed decision. Procurement actions, such as issuing an RFI or RFP, will occur after the final decision/ROD. Ward added that real proposals could be useful in coming to a final decision since it would give insight into what options are actually available and Joe said that he had the same thought, but that process may have flaws as well. The goal currently is to keep the process as neat as possible and focus on analysis, making a decision, and then contract actions. Joe shared additional details on the information gathered thus far, the goals it satisfies, and how it will be used to communicate viability with potential developers.

Ward asked about the timeline of the PA and ROD then an RFI and Joe explained that the PA is an informative document that does not tell the decision maker what to do but defines the terms of the alternatives based on historic preservation considerations. In contrast, the EIS is required to state the preferred alternative, which indicates the position of the lead agency, and leads to the ROD. He also



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reiterated the provision of information from this process to the PBS commissioner and the feedback/requests from them in return.

Ward spoke about the attention the buildings are getting now but how concern over their future has been ongoing for many years. Joe spoke about the NEPA process and its democratic nature including scoping meetings and public hearings, public distribution of the EIS, and about the Section 106 process and the privileged status given to consulting parties due to their expertise in preservation and the importance of that information to making a final decision.

Ward brought up the recommendation of the buildings as Chicago landmarks made to the Chicago City Council and the additional time requested by GSA, and asked if the buildings can now go through that process. Joe explained GSA's role in the process and its continued conversation with the city as well as its neutral position. He stated how it is the Section 106 process that will dictate how the federal government moves forward and emphasized how the process has always treated the buildings as landmarks due to being historic properties per NHPA/NRHP. As a final comment, Ward pointed out that Chicago Landmarks cannot be demolished.

Brad asked for clarity about the information collected and if it is all being done by GSA or if there are any third parties involved. Joe noted that all of the consulting parties are third parties and that there is also the Emax study as well as the outside parties and GSA peers that were involved in the charrettes. Federal stakeholders outside of the GSA have also been involved. Brad asked if there is information that has not been shared with the consulting parties and Joe assured him that there is not.

Joe closed the meeting.



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Minutes

Attendees (sorted alphabetically):

| | |
|--|-----------|
| Anthony Rubano – Illinois SHPO | Virtual |
| Benjamin Rhodd – Forest County Potawatomi Community, THPO | Virtual |
| Beth Savage – GSA | Virtual |
| Betsy Merritt – NTHP | Virtual |
| Brad White – Consulting as an Individual | In person |
| Brie Martin – Franciscan Friars Archive, Our Lady of Guadalupe Province | Virtual |
| Carla Mykytiuk – Jacobs | In person |
| Carol Wallace – Illinois SHPO | Virtual |
| Charlie Webb – Jacobs | In person |
| Christopher Cody – NTHP | Virtual |
| Cynthia Roubik – City of Chicago | Virtual |
| Dirk Lohan – AIA Chicago | In person |
| Eiliesh Tuffy – City of Chicago | Virtual |
| Greg Rainka – Commonwealth (Jacobs team) | Virtual |
| Holly Fiedler – Franciscan Central Archive; Chicago Collaborative Archive Center | Virtual |
| Jaime Loichinger – ACHP | Virtual |
| Jeffrey Jensen – GSA | Virtual |
| Joe Mulligan - GSA | In person |
| Kandalyn Hahn – City of Chicago, Commission on Chicago Landmarks | In person |
| Keira Unterzuber – Administrative Office of the U.S. Courts | Virtual |
| Kendra Parzen – Landmarks Illinois | Virtual |
| Kevin Harrington – Mies van der Rohe Society of the Illinois Institute of Technology | Virtual |
| LaDon Reynolds – Chief Marshal, USMS, Northern District of Illinois | Virtual |
| Lori Durio Price – Jacobs | In person |
| Lucrezia Patruno – GSA | In person |
| Marc Zitzer – GSA | In person |
| Mark T. Buechel – NPS | Virtual |
| Megan Funk – Commonwealth (Jacobs team) | Virtual |
| Michael Edwards – Chicago Loop Alliance | Virtual |
| Michael Gonczar – GSA | Virtual |
| Michael Wood – Chicago Architecture Center | In person |
| Nicky Emery – GSA | In person |
| Patrick Grossi – Preservation Chicago | In person |
| Chief Judge Rebecca Pallmeyer | In person |
| Regina Nally – GSA | In person |
| Rolf Achilles – Mies van der Rohe Society of the Illinois Institute of Technology | In person |
| Sarah Schrup – US Courts of Appeals for the Seventh Circuit | In person |
| Tom Bruton – US District Court, Northern District of Illinois | In person |
| Traci Murray – US District Court for the Northern District of Illinois | Virtual |
| Victoria Kahle – US Court of Appeals for the Seventh Circuit | In person |
| Ward Miller – Preservation Chicago | In person |
| Zachary Tarr – U.S. Department of Homeland Security, FPS | Virtual |



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Joe Mulligan (GSA) opened the meeting and stated that the purpose of this meeting is to review the second draft of the programmatic agreement (PA), which has been revised to include comments and suggestions presented at the last meeting, as well as to further discuss the document and potential mitigation measures. We are in the midst of a second comment period that will be used to create a third draft of the document, which will be reviewed at the April 22 consulting parties meeting.

Joe then introduced a new participant, Patrick Grossi (Preservation Chicago), who replaced Mary Lu Seidel.

Joe reiterated housekeeping items including the privileged status of the consulting parties and the confidentiality of the materials shared in consulting parties meetings as well as other courtesies such as muting microphones and using the chat feature.

Rolf Achilles (Mies van der Rohe Society of the Illinois Institute of Technology) requested to know how many more consulting parties meetings to expect. Joe shared that the April meeting is the only meeting planned at this time and the hope is that it will result in a final draft of the PA and completion of the Section 106 process. If necessary, an additional meeting may be organized.

Brad White asked for an update on any other reports and materials GSA is preparing. Joe listed reports and documents, including a charrette summary/report that will be shared as a draft with the consulting parties. He also shared that the Final EIS is expected to be completed in a few months, following the selection of a preferred alternative. He emphasized that the documents being prepared will contribute to the record of decision (ROD), which is projected to be completed in July.

Lori Price (Jacobs) provided a summary of the changes made to the first draft as well as topics to discuss further. She shared that additional information was added on page 1, lines 24-26, about when the buildings were acquired and when they were vacated. This included a new whereas clause clarifying that 202 was vacant at the time of acquisition, the remaining buildings were partially occupied, and all of the buildings were fully vacant by June 2014.

Ward Miller (Preservation Chicago) pointed out that 220 South State Street was re-envisioned as 1 Quincy Court before GSA acquired the building and underwent extensive renovation at that time. He noted that due to this, it was in decent shape and has only fallen into disrepair since GSA's acquisition. Regina Nally (GSA) shared that there were issues such as a deficiency of exits to the building and not meeting other government requirements. Brad expressed the need to clarify the phrase "compromised condition" in the added whereas clause, page 1, lines 27-30. He stated that the word is vague and may lead people to think the building had major issues, while in reality it was structurally sound. Lori agreed to re-phrase. Some discussion followed concerning the occupied status of 202 South State Street when it was acquired. Lori noted that the preservation plan from 2009 and condition report from 2023 are referenced in the whereas clause but are not included in an appendix due to size. She and Regina emphasized the use of these documents to measure how the conditions of the buildings have changed during GSA's ownership. Ward asked about additional studies that were conducted following GSA's acquisition and Joe gave some background information in addition to pointing to the timeline in the PA (which was taken from the Draft EIS) for when different studies and reports were done.



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Next, Lori addressed questions about plans including one posed by Holly Fiedler (Franciscan Central Archive; Chicago Collaborative Archive Center) about whether there was a building preservation plan with pricing. Lori noted new language added to the whereas clause that begins on page 1, line 42, and provides more specifics of the types of studies completed. She also shared a new attachment, Attachment A, which contains a list of plans with summaries and a timeline of when they occurred.

Lori then addressed a comment about past investment in the Bond Building. She explained that GSA determined that the project was a wholly separate endeavor from any plans for the subject buildings. Ward recalled a meeting from ca. 2013 that discussed the 200 block from Jackson to Adams and which buildings GSA would invest in. He pointed to the whereas clause on page 2, lines 5-11, which mentioned funding requests made in 2011 and 2012, and asked if funding was received and if it was for the Bond Building. Regina explained that funds were obtained for the Bond Building through the American Recovery and Reinvestment Act of 2009 and received in 2010 or 2011. She emphasized the many considerations that go into choosing which buildings from GSA's nation-wide investment portfolio to invest in and how the Bond Building project was chosen over other projects due to its ability to fulfill government needs and to be fully occupied/utilized due to its smaller scale. Ward asked if the whereas clause could be expanded to include whether or not the funds were received or denied. Joe explained that GSA often makes requests that are denied or never addressed. Marc Zitzer (GSA) added that the funds for the Bond Building came from funds provided by Congress under the American Recovery and Reinvestment Act and not from the Federal Building Fund, which typically funds GSA projects. Marc also noted the Bond Building renovation cost much less than renovating 202 and 220 South State Street would have cost.

The next comment addressed why the City of Chicago pulled out of the past project. Text from the letter received from the city was added to the whereas clause on page 2, lines 28-30.

Lori then asked for further clarification on a request from Holly to add more details to the whereas clause on page 3, lines 11-15, which defines the viable adaptive reuse alternative. Joe explained that Holly was asking for information about the viable adaptive reuse criteria notice of availability, federal register number, and the date it was posted. Lori offered to add that information in Attachment B.

Lori then addressed comments about the Chicago Landmarks nomination and pointed to a new whereas clause on page 5, lines 22-29, that notes the desire of some consulting parties and the wider public to see the buildings preserved. The clause notes efforts such as placing the buildings on Preservation Chicago's 7 Most Endangered list and Landmarks Illinois's Most Endangered Historic Places in Illinois, as well as voting to designate 202 and 220 South State Street as Chicago Landmarks.

Ward asked about the whereas clauses on page 4 that note responses from Native American tribes (Forest County Potawatomi Community and Miami Tribe of Oklahoma) and asked if information on the other parties involved could be added. Lori answered that one of the attachments is a table with all of the consulting parties.

At the last meeting, Holly asked for the charrette report to be included as an attachment to the PA. Lori explained that it will not be attached to the PA but will be a part of the EIS or ROD.



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The previous discussion about acknowledging the many years of public interest in the preservation of the buildings was addressed next. Lori pointed again to the new whereas clause on page 5, lines 22-29, that recognizes the buildings' inclusion on various most endangered lists and its Chicago Landmark designation.

Ward thanked GSA for adding the clause but emphasized additional advocacy that could be included. Joe explained that the intention of the clause is to recognize public support rather than provide a complete list of activities.

Lori then addressed language on page 6, section A, which clarifies that the extent of mitigation will be determined by the extent of demolition, i.e., if all of the buildings are demolished or if only one building is demolished, as well as the level of significance of any building demolished.

Kevin Harrington (Mies van der Rohe Society of the Illinois Institute of Technology) asked if a whereas clause addresses the engineers' assessment of the buildings and the determination that they were structurally sound. Lori referred to the clause on page 1, lines 27-30, which states the buildings are structurally sound according to the 2023 conditions assessment.

Kevin talked about the role of the federal government and, in his terms, its obligation to be a good neighbor. He requested language be added to acknowledge the Section 106 process and the positive relationship it establishes between the federal government and the public. Joe explained that such sentiment is difficult to incorporate in the PA because it doesn't fit within the whereas clauses (factual statements) or the mitigation discussion. Regina brought up NEPA and Joe listed some of the many areas considered in that process and how the federal government takes them into account when making decisions.

Brad suggested adding language about "being a good neighbor" to the introduction of the PA. Lori suggested adding a whereas clause with language from 36 CFR § 800 and the goal of GSA as a federal agency to balance preservation concerns with the needs of the federal government. All agreed this was a good solution.

Lori then addressed a comment from the National Trust for Historic Preservation (NTHP) requesting that building documentation (page 7, item 6) not be included as a mitigation measure on the basis that appropriate recordation of historic buildings prior to demolition is a statutory requirement (54 U.S.C. § 306103). Lori emphasized the importance of including documentation as a mitigation measure as a way of clarifying the level of documentation desired and ensuring that an appropriate level of documentation be achieved versus a minimal effort. Some discussion continued with Regina stating that including documentation in the PA defines what the specifics of that effort will be as well as what the consulting parties want it to be. Brad suggested referencing the regulation and Lori agreed to do so.

Joe asked what the consulting parties want the level of documentation to be, and Ward requested drawings, photographs, and videos.

Christopher Cody (NTHP) shared that the intent of the comment was to establish that unlike mitigation measures, "making an appropriate record" is a statutory requirement and in the case of demolition



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must be done regardless of other factors. He emphasized the importance of the current conversation in establishing what an appropriate record is in this case as well as memorializing the statute.

Lori moved on to a comment from Brad about salvage and deconstructing the buildings if the demolition alternative is selected. Lori shared the updated language on page 6, item 3, which, in summary, stipulates that GSA will make a good faith effort to identify parties interested in salvaged materials. Brad suggested working with organizations and contractors that deal with deconstructed materials. Lori and Regina spoke about how the salvage process could work as well as how the PA allows the mitigation measures to be further developed and refined after the ROD.

Brad asked for clarification on the PA and GSA's request for details about documentation while also saying that details on salvage/recycling can be determined later. Lori explained that the current section of the document is intended to make broad commitments and that more detail will be included in the attachment. She also explained that once a preferred alternative is known, additional details will be added based on the specifics of that path forward.

Next, Brad spoke about the commitment to support local climate goals (page 7, item 9) and asked if GSA is committing to adhere to city ordinances that relate to the city's climate action plan. Regina responded that the federal government has regulations as well and that those may or may not meet a higher threshold than the city's plan. Brad asked if GSA will choose the higher threshold and Joe shared that GSA typically follows the more stringent regulations. Lori explained why the comment was included and Joe agreed to add more about the federal process.

Kevin asked if the language about salvage could be strengthened to the extent that the efforts and cost to salvage materials would far exceed the effort and cost to preserve them. He used the example of architectural features being displayed in parks and the undesirability of such features being treated as museum pieces versus preserving the buildings for the beneficial use of the government. Joe explained that such language would be unlikely to pass GSA review but that the current approach reflects a good faith effort. He projected that if the demolition alternative was chosen, GSA would try to find purposeful uses for the elements. Lori added that this section of the PA will only be enacted if the demolition alternative is selected and adding such language will not likely influence the decision.

Brad suggested that language be added to emphasize recyclable and reusable, versus just recyclable and Lori agreed.

Lori moved on to a comment made by Landmarks Illinois that addressed working with the city to meet the goals set forth in its climate action plan as well as to support the revitalization of State Street and the priorities of the *Elevate State* report. In response, GSA added item 10 on page seven and Lori pointed to Attachment F for more specific ways that these objectives will be met.

Lori then addressed a comment from Brad about establishing a \$5 million fund for the improvement of retail space in the area. He suggested this fund be administered by the Chicago Loop Alliance, Preservation Chicago, and Landmarks Illinois. In response, GSA added item 11 on page 7, which commits to investing in 230 South State Street (Benson & Rixon Building), including façade and storefront renovation. This project was suggested due to its location in the project area and as a more focused preservation effort.



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Brad followed up by asking for clarification that all of the mitigation efforts will not be carried out but rather a selection will be chosen from the list created. Lori answered yes and explained that one of the next steps will be to compile all the mitigation ideas into a matrix and have CPs comment and rank them based on their preferences. GSA will take that information and look at what it is capable of carrying out as well as what it is capable of funding.

Ward asked where the funding for mitigation will come from, and Joe explained that funding may come from GSA's historic preservation fund or other sources depending on what the mitigation measure is. For example, landscaping the vacant site will fall under the \$52 million appropriation because it is specifically authorized by Congress.

Ward asked for clarification on the different possibilities of reuse, demolition, or a combination of the two. Lori assured him that the PA addresses each possibility.

Lori moved on to the next item added in the PA, item 12, page 7, which addresses the design of the vacant site. The added language states that GSA will consult with consulting parties on the design of the site. Lori provided examples of what might be discussed such as security measures and fencing.

Within the section about viable reuse, language was added that NPS would be included in any consultation regarding redevelopment or new construction at the site, including the treatment of 208-212 (page 8, item 6). Lori pointed out that this is the only comment received within the viable reuse section.

Patrick Grossi (Preservation Chicago) asked for clarification on why the PA has two paths and Lori explained that it is because there is not a preferred alternative or ROD at this time. She pointed to information shared in previous meetings for further clarification.

Lori shared a new attachment (Attachment A, Previous Studies) that lists the previous surveys and studies as well as a timeline of when they were conducted.

Next, Lori shared language added in Attachment B, Viable Adaptive Reuse Criteria, to address questions about where the criteria came from and when they were developed. The added information clarifies that the criteria were conceived in 2015 after the buildings were determined to be surplus, expanded in 2017, and finalized in 2022. In response to a request from Holly, Lori agreed to add when the criteria were first shared with the public.

Ward asked about other documents, including renderings showing 202 and 220 South State Street connected by an interim building. Joe explained that those studies were conducted for GSA by architectural firms but were too costly to pursue and did not advance for redevelopment. Ward asked if they could be included in the recent site history. Joe responded that the PA focuses on the actions that occurred during the federal government's ownership and Lori pointed to the history shared in the whereas clauses. Regina clarified that those proposals were created for the purpose of receiving feedback, evaluating federal need, and exploring the feasibility of full restoration, partial restoration, etc. Federal need, however, didn't support the project and funding was never allocated. Discussion ensued about when the studies were conducted, before or after GSA started the acquisition process, and GSA staff pointed to the timeline of studies included in Attachment A. Ward offered to look into the



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matter further and Brad suggested adding a few words in the timeline with an asterisk noting the actual document. Joe and Lori asked Ward and Brad to look over the language already in the PA and let GSA know if they still thought additional information was needed.

There were no comments on Attachments C through E.

Lori shared that Attachment F, Mitigation Measures, is where more details on the various mitigation measures and stipulations can be added after the ROD is finalized. Ward asked if the discussions about mitigation will continue after the ROD and Joe assured him that they would. Lori explained a little more about the process going forward and the detail that will be added to the final document.

Lori explained that Attachment F is based on the mitigation section of the overall document but with more specifics. She pointed to language that incorporates specific suggestions made by the consulting parties, such as language under items 11 and 12 (Support Climate Goals and Support Revitalizing State Street) that addresses purchasing carbon offsets and funding the installation of wayfinding signage/interpretive panels on South State Street.

Joe asked for more clarification on technical terms that may not be understood by the wider audience.

Kendra Parzen (Landmarks Illinois) explained that the suggestions use language that came directly from the *Elevate State* report and is meant to be examples of the priorities identified in the report. She said that more detail on the meaning of the terms and actions can be found in the report. Kendra also emphasized further consultation with the city and the Chicago Loop Alliance to determine what measures are most important to them.

Lori said that she would add the new comments to the draft as well as any other comments received and share it with the consulting parties.

Kevin spoke about the use of Quincy Court and making the most of the passage, such as making it a pedestrian access for the Dirksen Courthouse versus its use as vehicular access to The Berghoff. Joe agreed that some language to address the use of Quincy Court can be added. He also mentioned the pre-existing memorandum of understanding with The Berghoff and suggested referencing that document in any language that is added. Some additional conversation continued addressing the role of Quincy Court to Mies van der Rohe's design of the Chicago Federal Center and how redevelopment/recognition of the area would be beneficial to the project going forward.

Ward asked about the negative effects of the demolition of 202 South State Street to The Berghoff. Joe explained that the Congressional authorization directs GSA to protect adjacent properties and that if 202 South State Street is demolished, GSA will be required to address any structural issues caused to The Berghoff. Joe brought up the treatment of The Berghoff during and after the demolition of 208-212 South State Street including continuous monitoring during the process and tuckpointing the exposed brickwork once demolition was completed. He added that GSA has and will continue to work closely with the owner of the building to address any effects of future actions.

Lori asked for any additional comments on the draft, particularly the clean version shared before this meeting. Holly asked, in reference to the version reviewed in the meeting, about item 6 on page 7, Documentation, and if reference could be made to Attachment F, Mitigation Measures, where those



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measures are more specifically outlined. Lori explained that though the attachment is not referenced under item 6, it is referenced in the introductory paragraph of the overall section.

Betsy Merritt (NTHP) asked for clarification on the review period and Lori responded that the deadline for submission of comments on the second draft of the PA and mitigation priorities is April 2. She also shared that GSA will send out the third draft to the consulting parties on April 12. This will include a draft with all comments and responses included and a clean version without comments. During this time period, GSA will review the prioritized list of mitigation measures and determine which can be implemented and bring that list back to the consulting parties for consensus. Following this, the final PA will be completed with a projected completion by the end of April. The next consulting parties meeting will be on April 22 from 1-3 pm and will have in-person and virtual options.

Ward asked when the GSA will talk to developers who are interested in the buildings and if their interest will be taken into consideration before the preferred alternative is chosen. Joe talked about the charrettes and the discussions with developers that they produced and how the information gained from that process will help inform the final decision. After the final decision, the appropriate procurement process will begin based on the alternative chosen, which in the case of reuse, is when conversations with developers will occur and proposals will be accepted. Ward emphasized the importance of knowing that information before the decision, i.e., if a developer is interested, preservation makes sense, but until that is known, it can't be taken into consideration in the ROD. He expressed concern that GSA may choose demolition despite there being a viable reuse. Joe reiterated that the charrettes identified best uses as well as financing and assured Ward that the charrette report will be available to the consulting parties before the next meeting. Joe also emphasized that the final decision will be made based on the merits of the alternatives versus one or more proposals from developers. Regina commented on the informal process of capturing ideas from the development community at this stage and the formal process that the federal government has to follow in selecting actual projects.

Kendra asked about the charrette report and whether it will include information on other times the GSA has used the charrette process as part of regulatory review. Regina answered that it has been used before and Joe agreed to make a note about other examples.

Holly asked about a reuse procurement timeline and Joe explained that it would be developed after the ROD, but that it will be shared with developers and stakeholders.

Joe thanked everyone and adjourned the meeting.



Minutes

Attendees (sorted alphabetically):

| | |
|---|-----------|
| Anthony Rubano – Illinois SHPO | Virtual |
| Beth Savage – GSA | Virtual |
| Betsy Merritt – NTHP | Virtual |
| Brad White – Consulting as an Individual | In person |
| Brie Martin – Franciscan Friars Archive, Our Lady of Guadalupe Province | In person |
| Carla Mykytiuk – Jacobs | Virtual |
| Carol Wallace – Illinois SHPO | Virtual |
| Charlie Webb – Jacobs | In person |
| Christopher Cody – NTHP | Virtual |
| Dirk Lohan – AIA Chicago | In person |
| Erik Martinez – City of Chicago | Virtual |
| Frank Butterfield – Landmarks Illinois | In person |
| Greg Rainka – Commonwealth (Jacobs team) | Virtual |
| Holly Fiedler – Franciscan Central Archive; Chicago Collaborative Archive Center | In person |
| Jaime Loichinger – ACHP | Virtual |
| Joe Mulligan - GSA | In person |
| Kandalyn Hahn – City of Chicago, Commission on Chicago Landmarks | Virtual |
| LaDon Reynolds – U.S.Marshal, USMS, Northern District of Illinois | Virtual |
| Lori Durio Price – Jacobs | In person |
| Lucrezia Patruno – GSA | In person |
| Marc Zitzer – GSA | Virtual |
| Mark T. Buechel – NPS | Virtual |
| Megan Funk – Commonwealth (Jacobs team) | Virtual |
| Michael Gonczar – GSA | Virtual |
| Michael Wood – Chicago Architecture Center | In person |
| Michael Woods-Hawkins – Chief Deputy Marshal USMS, Northern District of Illinois | Virtual |
| Nicky Emery – GSA | In person |
| Patrick Grossi – Preservation Chicago | In person |
| Rebecca Pallmeyer – Chief Judge, Northern District of Illinois | Virtual |
| Regina Nally – GSA | In person |
| Rolf Achilles – Mies van der Rohe Society of the Illinois Institute of Technology | In person |
| Sofia Becker – Jacobs | In person |
| Traci Murray – US District Court, Northern District of Illinois | Virtual |
| Victoria Kahle – US Court of Appeals for the Seventh Circuit | In person |
| Ward Miller – Preservation Chicago | In person |



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Joe Mulligan (GSA) opened the meeting and welcomed participants. He shared that the purpose of this meeting is to provide updates on the charrette summary report and to review the updated second draft of the programmatic agreement (PA) (draft dated 4-15-2024) and ranked mitigation methods. He outlined upcoming steps in the Section 106 process including review of the charrette summary report, selection of mitigation measures, and final PA.

Brad White asked for clarification on who is deciding on the mitigation measures and Regina Nally (GSA) explained that GSA will take the ideas provided by the consulting parties and determine which ones GSA is able to carry out in terms of funding and authority to do so. Once final measures are determined, they will be included in the PA and implemented. Brad asked where the funding will come from, and Regina answered that it may come from a variety of sources.

Frank Butterfield (Landmarks Illinois) pointed out that adaptive reuse could have an adverse effect and asked if any mitigation measures will be implemented if that alternative is chosen. Regina and Lori Price (Jacobs) pointed to the PA and the different mitigation measures it provides for each alternative.

Next, Lori shared the current version of the PA including comments from the last consulting parties' meeting and changes made to address those comments. Ward Miller (Preservation Chicago) asked about wording of the whereas clause on page 1, line 25. He was concerned it implied that 208-212, 214, and 220 South State Street were not suitable for tenants when the buildings were acquired by GSA. Ward stated businesses leased space in the buildings and they were in good, usable condition at that time. He also spoke of a plan that had been in the works to redevelop Quincy Court. Regina explained that while there were tenants in 208-212, 214, and 220 South State Street when GSA acquired the buildings, the buildings were in violation of local building codes that made it necessary for GSA to move tenants out of the buildings. Ward asked that more information be added to clarify that the buildings had tenants and were in good condition when GSA acquired them. He agreed to send additional comments/language to GSA following the meeting.

Brad asked for additional text to address how the buildings have deteriorated during GSA's ownership and Ward asked if there are any architect reports or city inspection records that document investment or planned investment in the buildings, particularly 220 South State Street, before they were acquired by GSA. Joe agreed to see if the City has any records of the properties prior to the acquisition by GSA.

Brad asked about studies and building preservation plans that could have documented the buildings' conditions immediately upon acquisition or determined uses for them then. Regina explained the bid process and timeline for such activities and how it did not start until after all of the buildings were acquired for the purpose of combining efforts instead of conducting each one individually. Joe and Regina elaborated on past studies that explored federal uses for the buildings and how factors such as the recession, rise of telework, and federal mandates resulted in less need for federal office space and thus no justification for rehabilitation of the buildings. Dirk Lohan (AIA Chicago) asked if this was still true today and Regina answered that the need for office space has continued to decrease since then. Joe pointed to GSA's disposal plan for the Lipinski Building as an example of how GSA is attempting to reduce its portfolio.



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Ward asked about consolidating government offices within the State Street buildings, particularly those in the Lipinski Building, and using the sale of disposed properties to fund the State Street buildings rehabilitation. Joe explained that consolidation will take place but that many of the buildings already in operation have enough vacancy to accommodate additional needs. He further explained that the funds obtained from a disposal of a building cannot be used by GSA to direct to another property without Congressional authorization. Joe provided some examples of how the GSA can dispose of a building, such as using Section 412 (Consolidated Appropriations Act of 2005) which involves an exchange of services. Ward asked if the PA mentions the past Section 412 services proposal for the State Street buildings and Joe pointed to the whereas clause on page 2, line 35, which discusses activities taken in 2013.

Ward then addressed the whereas clause on page 1, line 32, that relates to GSA's investments in maintenance, protection and stabilization of the buildings. He stated that GSA's investment has been minimal and gave examples of graffiti artists being able to enter the buildings and maintenance issues that have gone unaddressed. In regard to security, Joe acknowledged that incidents do happen and explained that GSA works with law enforcement to prevent future issues. As for maintenance, he explained that when façade inspections are conducted, members of the architecture/engineering firm are assessing the façade work alongside members of the repair team so that when something is identified, it is immediately addressed. Regina added that GSA has a funding threshold of three million dollars and that any project above that amount requires congressional authorization. Currently, façade inspections are conducted every 2 to 3 years and cost between \$800,000 - \$1,000,000. The next inspection is planned for this summer. Ward acknowledged these efforts but emphasized other issues and the overall negative effect they have had on the buildings and asked that GSA include stronger language to better reflect the buildings as distressed. Joe agreed to look for information on the buildings when they were privately owned, including any code violation reports from the City. He also pointed to language (page 2, line 1) that was added during the last round of edits to convey that the three remaining buildings, though worse for wear on the exterior, are still structurally sound. He noted how this language balances the positive and negative aspects of the building conditions. Some discussion ensued about how to move forward. Lori agreed to review the language but noted that if more in-depth information is desired, it would be more suitable in an appendix than within the whereas clauses.

Lori read a comment from Kandalyn Hahn (City of Chicago) about a newspaper advertisement in the September 1, 2006, *Chicago Tribune* soliciting tenants for 220 South State around the time that GSA acquired the buildings. Kandalyn offered to share any other documentation that the City may have of tenants in 202 and 220 during that period. Lori accepted that offer.

Dirk asked about funding set aside to maintain the buildings. Regina and Joe explained that the current 52 million dollar congressional appropriation is limited in how it can be spent to comply with the language in the appropriation, and that other projects, including those of the entire GSA portfolio, are funded through GSA's annual budget. Because the budget is limited, projects and needs are prioritized and not all can be addressed. Dirk asked if a separate/additional request could be made to Congress to fund restoration of the buildings and Ward added that when GSA acquired the buildings, there was a promise to use them and to build a new building between them. Regina clarified that there was a



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feasibility study, but the idea never progressed beyond that stage – GSA did not make any promises related to that study. Ward asked for language to be added addressing the early expectations or “hopes” for the buildings and agreed to send comments to GSA after the meeting.

Lori outlined other changes in the document including whereas clauses added at the bottom of page 1 and top of page 2 that address daily, semi-annual, and biennial inspections and repairs; maintenance related to safety and security; and the results of the 2023 Condition Assessment Reports.

Holly Fiedler (Franciscan Central Archive; Chicago Collaborative Archive Center) asked if additional information from today’s conversation would be added to the whereas clauses and Lori assured her that the comments collected in the meeting as well as after the meeting will all be considered in the next draft.

Next, text added to the whereas clause on page 2, line 16 was outlined. This whereas clause addresses federal-use redevelopment studies conducted between 2007 and 2015. The new language explains that the studies included Section 106 consultation with the Illinois SHPO, ACHP, Landmarks Illinois, and Preservation Chicago. A related whereas clause on page 2, line 30 was updated to reflect the suspension of Section 106 consultation in 2013, when it became clear that the proposed reuse project no longer met the needs of the federal government.

Ward brought up the whereas clause on page 2, line 23 (between the above mentioned clauses), which discusses two prospectus funding requests for the buildings that were prepared for fiscal years 2011 and 2012 and how those requests did not go forward due to other GSA funding needs. He pointed out that GSA did go forward with a funding request that resulted in a substantial investment in the smaller but less architecturally significant Bond Building, just south of 220 South State Street. He emphasized how that choice shifted the activity on the 200 block away from the subject buildings. Joe and Regina explained that because the Bond Building is smaller, GSA was able to pair it with federal needs that fully utilized the space, something that it would not have been able to accomplish with the subject buildings. Lori reminded everyone of GSA’s previous explanation that the funding for the Bond Building project did not come from GSA’s budget but from American Recovery and Reinvestment Act (ARRA) funds. Regina also pointed out that the project was not chosen based on the significance of the buildings but on federal need and which building could most readily and fiscally responsibly meet that need. Ward noted that had 220 South State Street remained in use when GSA acquired it, the cost of rehabilitating it would have been less than it is now. Regina reiterated the life safety issues that needed to be addressed before federal employees could occupy the building and the substantial cost those activities would have incurred. Ward asked if the amount invested in the Bond Building could be shared and Regina agreed to do so. Ward and Joe talked about the feasibility study mentioned earlier that included rehabilitating 202 and 220 South State Street and constructing a new building between them. Joe shared that the cost for that project would have been in the hundreds of millions of dollars and Regina added that the high cost is partially due to the high standards the federal government is required to meet for federal occupancy. Brad and Joe discussed the high cost further, with Joe clarifying between the feasibility study and the conditions assessment report. Lori added that the whereas clause in question was not edited in response to Ward’s earlier comment because the Bond Building project was separate from any projects concerning 202-220 South State Street.



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Marc Zitzer (GSA) spoke about the life safety issues at 220 South State Street and how they apply not only to federal occupants, but to all occupants of a federally owned building. He pointed to those issues as the reason that non-federal tenants were vacated from the building following GSA's acquisition. Marc also added that prior to the expenditure of funds at the Bond Building, it was already occupied by federal employees as leased office space.

Holly asked what year the feasibility study was conducted. Joe and Regina shared that it was from 2009 to 2013 (page 2, line 20).

Lori addressed a request from the ACHP to add more clarity to the whereas clause on page 3, line 3 concerning what happened with the private redevelopment option. The new language was previously amended to explain why the City of Chicago withdrew its offer and was amended again to add more detail about the process that occurred, particularly that the City secured a qualified developer. Ward asked for the clause to include language about the proposal being denied by GSA and/or federal judges. Some discussion ensued about whether the proposal was denied or withdrawn. Regina stated that GSA does not have any documentation of a proposal being denied. There is a letter from the City withdrawing its offer due to being unable to meet the security needs of the project, the text of which is included in the whereas clause.

Ward talked about the challenges presented by the viable adaptive reuse criteria and how they affected the City's ability to make its offer work as well as how they are affecting current discussions. Joe explained the background of the criteria, and how the criteria went from 13 criteria in the disposal effort to the current 15 criteria due to concerns and the failures of the disposal effort. The additional criteria on retaining federal ownership and use restrictions are lessons from the failed disposal effort.

Ward also commented on the use of the buildings as a collaborative archive center being excluded from the charrette summary presentation and Joe explained that the summary was intended to capture feedback from the industry professionals involved based on what would be the most financially viable. Residential rose to the top for its ability to obtain financing, and government occupancy was a top consideration because it avoids the 15 security criteria considerations.. Joe emphasized that this doesn't diminish the idea of an archive and offered to add any archival proposal provided as an attachment to the charrette summary report.

Ward expressed concern over how a final decision for the future of the buildings will be made when no proposals have been reviewed. Joe explained how the charrettes were designed to collect general market information on use, financing, and potential to meet the viable adaptive reuse criteria. That information paired with information from the NEPA and Section 106 processes will be shared with federal decision makers. He explained that requesting proposals has to come after a federal decision to reuse the buildings is made. Ward asked who the federal decision makers are and Joe answered that it is the Public Buildings Service Commissioner, Elliot Doomes.

Dirk asked for clarity about the City withdrawing its proposal due to security concerns and expressed that of all the parties concerned, the City should have the biggest responsibility and desire to revitalize this block of State Street. Joe assured him that the City is actively involved in the conversation about the



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buildings including people within this meeting, the landmarks commission, legislative affairs, and others at various levels of the city government.

Michael Wood (Chicago Architecture Center) asked for more information to be added about where the viable adaptive reuse criteria originated. He pointed to the whereas clause on page 3, line 3 about the City withdrawing its offer to purchase the buildings due to security concerns and a later clause at line 36 that specifically mentions the criteria. Joe explained that the criteria began as covenants attached to the disposal action and that after it fell through, most of the covenants were incorporated into the current viable adaptive reuse criteria list. Lori made a note to add a new whereas clause with this information. She also shared that there is more information about the development of the criteria in the appendix.

Holly asked how the charrettes produced residential use as one of the most viable options when it is precluded by the criteria. Joe explained that the charrettes were styled to allow all uses to be considered. In this way, ideas that do not meet the criteria could be presented and reconsidered to see how they might work. He shared that some of the ideas that came up were taken back to federal law enforcement for discussion. Regina added that this process was also helpful in identifying additional uses that did and did not pose obstacles and giving law enforcement a chance to evaluate them.

Lori moved on to a comment from Brad about hardening the federal center buildings and the importance of taking that action before deciding to demolish the State Street buildings. Regina explained that security decisions concerning the courthouse are made by the building security committee, which is made up of representatives of its tenants. The committee presents security needs to GSA and GSA seeks funding sources to support those requests. Text was added to the whereas clause on page 3, line 14 stating GSA's commitment to working with other federal security entities to the extent possible to ensure the security of the courthouse. Brad expressed disappointment with the process and its focus on reusing or demolishing the subject buildings versus making security upgrades to the courthouse itself. Lucrezia Patrino (GSA) talked about the current Section 106 process as well as how the security of the courthouse is an ongoing discussion, but that the details of its security can't be discussed in this setting. Dirk shared his experience working on the FBI Building on Roosevelt Road and the detailed specifications provided for that project. He suggested that someone within GSA or another government entity should be able to say what needs to be done to the courthouse, particularly with there being other high risk government buildings throughout the country. Regina pointed out that the Dirksen Courthouse is unique in terms of size, the types of cases heard, location, and vulnerabilities and stressed the many factors that go into ensuring the security of a federal courthouse.

Frank acknowledged how much of the current project hinges on security and other factors that the consulting parties have no power over and voiced his frustration at wanting to know that the final decision will truly consider all options and possibilities. Regina noted that at the beginning of this process, the only information available was the allocation from Congress to demolish the buildings. Now, due to the Section 106 and NEPA processes, the decision maker has significantly more information to base the final decision on. She also assured him that GSA is sharing as much information with the consulting parties as possible and that the 15 criteria were developed to address the most critical security concerns for the courthouse. Regina emphasized that the level of interest and concern over the potential demolition of the buildings has not gone unnoticed.



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Ward shared some of the insights and feedback that he has received from the local public in support of preserving the buildings as well as feelings of distrust, and the public feeling like the project is being forced in a particular direction.

Joe added that when the record of decision (ROD) is issued, it will include explanations and reasoning behind the decision. He also pointed out that GSA was allocated the funding to demolish the buildings two years ago and has been in the consultation process since then, including charrettes, supplemental analyses, and additional meetings to reach an informed decision.

Ward shared additional feedback that he has received from the greater public including concern from state and national preservation organizations and voiced his own concern that this will create a precedent for other cities and buildings.

Regina took a moment to acknowledge the current commercial real estate market and how new technology has changed the market in unpredictable ways. She also pointed to other obstacles such as mandates to reduce the federal footprint and federal spending and noted how all of these factors converging have made this project particularly challenging.

Lori introduced a new whereas clause on page 3, line 23. The clause was added in response to a request from Rolf that the federal agency acknowledge the historic preservation concerns of the greater community. Rolf agreed that revision addressed his concern.

Kandalyn asked in the chat if the charrette summary report will be included as an attachment to the PA and Lori answered that it will not.

Next, Lori showed updated language defining demolition as “complete or partial” removal of the buildings (page 3, line 34).

She then reviewed a new whereas clause on page 5, line 31 that adds more clarity to which properties (subject buildings, adjacent buildings, historic districts, etc.) may experience an adverse effect.

Ward requested that the full list of consulting parties be included in the whereas clause on page 4, line 29. Lori responded that due to size, it is included as an attachment instead of within the whereas clauses. The Native American tribes that were consulted and their responses are included in Whereas clauses as a measure of respect.

Lori pointed out various edits on page 6 of the PA including updating the whereas clause with “Most Endangered” lists to include the NTHP’s 11 Most Endangered Historic Places for 2023 list (line 12) and updating language starting at line 17 per suggestions made by the ACHP. Lori also changed added a new section titled “Avoidance and Minimization Measures” (line 38) per a suggestion from Brad and moved the associated text into the appropriate subsections.

Lori shared the revised “Mitigation Measures” section, which begins on page 7, line 23, and scrolled through text changes suggested by the ACHP. This section includes other changes such as changing the “Salvage” heading to “Salvage and Deconstruction” and adding “reuse” along with “recycling” efforts, both suggestions from Brad (page 8, line 14). She also pointed out updated language addressing the



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support of climate change goals, in particular that GSA will follow the most stringent of the federal and city policies (page 8, line 38).

On page 9, line 6, “Design of Vacant Site,” the language was updated to introduce a design review process for the site if demolition is to occur. In this scenario, the consulting parties will be invited to participate in the review process. In addition to design elements (paving, landscaping, and security), the process will include developing a public use plan.

Brad asked if the mitigation measure can include language that requires the landscaped site to be open and accessible to the public on a daily or regular basis. Lori said that it is too early to develop details of that kind. Joe agreed and provided an example that maybe it could be used for government functions such as a naturalization ceremony. Brad expressed concern that the area will end up fenced off and inaccessible to the public. Joe shared that the City is also concerned about the use of the space and, in particular, not having another Pritzker Park in the area. The final use of the site will be highly dependent on security concerns.

On page 10, under “Redevelopment of 208-212 South State Street or Other New Construction,” Lori added that the consulting parties will be invited to review plans for the site. She also added an additional item, “Rehabilitation of Quincy Court,” which states that GSA will develop a plan to rehabilitate the area to complement the federal center and State Street buildings in response to a comment from Kevin Harrington. Ward emphasized the importance of the Quincy Court corridor as the original entry point to the Dirksen Courthouse and Lori agreed to add this mitigation under the demolition alternative as well.

Kandalyn asked how the decision makers will hear about the first charrette’s conclusion that hardening the courthouse is possible and likely less expensive than demolishing the State Street buildings. Joe answered that some of the peers shared ideas at the charrettes but there were no cost estimates or a full understanding of scope associated with them. He said that the idea will be in the charrette summary report but no costs will be included.

Frank asked if the consulting parties will be notified when the ROD is signed, and Lori responded that they would be. Lori made a note to add that language in the PA for clarity within the “Reporting” section (page 11, line 19).

Ward asked about the 52 million dollar allocation and if it has an expiration date. Joe shared that it does not and that currently approximately \$45ms remains following expenditures to demolish 208-212 South State Street, remove the fire escape and stabilize the parapet at 202 South State Street, and to conduct NEPA and NHPA studies. The largest expenditure was the demolition of 208-212 at approximately \$3m.

Lori introduced the attachment discussing the viable adaptive reuse criteria. She pointed out the addition of the dates when they were made available to the public, first on November 1, 2022, via the Federal Register and again on September 15, 2023, via the Notice of Availability for the draft Environmental Impact Statement.



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Lori shared that within the mitigation attachment there are some additional details where known, but that most of the content is also within the body of the PA. Once the ROD is signed, the final details including timelines and schedules will be fleshed out and added in the attachment.

Next, Lori talked about the results of ranking the mitigation measures and the feedback received from the consulting parties. Instead of going through each measure, due to time, she opened the floor for specific questions and also offered for consulting parties to send any questions to GSA following the meeting.

Brad asked about partial versus complete demolition and whether they should both be included in the mitigation measures so that both can be ranked. Lori countered that partial demolition is an option under viable adaptive reuse. She gave the example of a developer removing the upper five floors of a building and adaptively reusing the remaining floors. Brad agreed with that approach. Mark Buechel commented that partial demolition cannot be mitigation because it would be an adverse effect and mitigation is about resolving effects not creating them.

Lori outlined next steps including GSA providing the charrette summary report to the consulting parties for review and comment before presenting a final version, updating the current draft of the PA to reflect new comments (due by Friday, April 26, 2024), evaluating and selecting final mitigation measures, and finalizing the PA.

The meeting concluded with a discussion of the timeline for the ROD and a request from various consulting party representatives to extend the current comment period. Brad emphasized receiving the minutes and charrette report before making final comments. Some discussion ensued about when the charrette report will be available and how or if its content will relate to the contents of the PA. Regina offered to have the minutes distributed within the next week (prior to May 3, 2024) but was hesitant to offer the charrette report any sooner than the second week of May. Lori emphasized the effect that pushing back the comment date will have on finalizing the PA. Brad insisted that the charrette report should be reviewed by the consulting parties before GSA finalizes the PA. Regina agreed to discuss the progress of the charrette report and respond to the consulting parties with more information on when it will be ready for review and to go forward from there.

Joe thanked everyone and adjourned the meeting.

B2. Section 106 Agency Correspondence

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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)

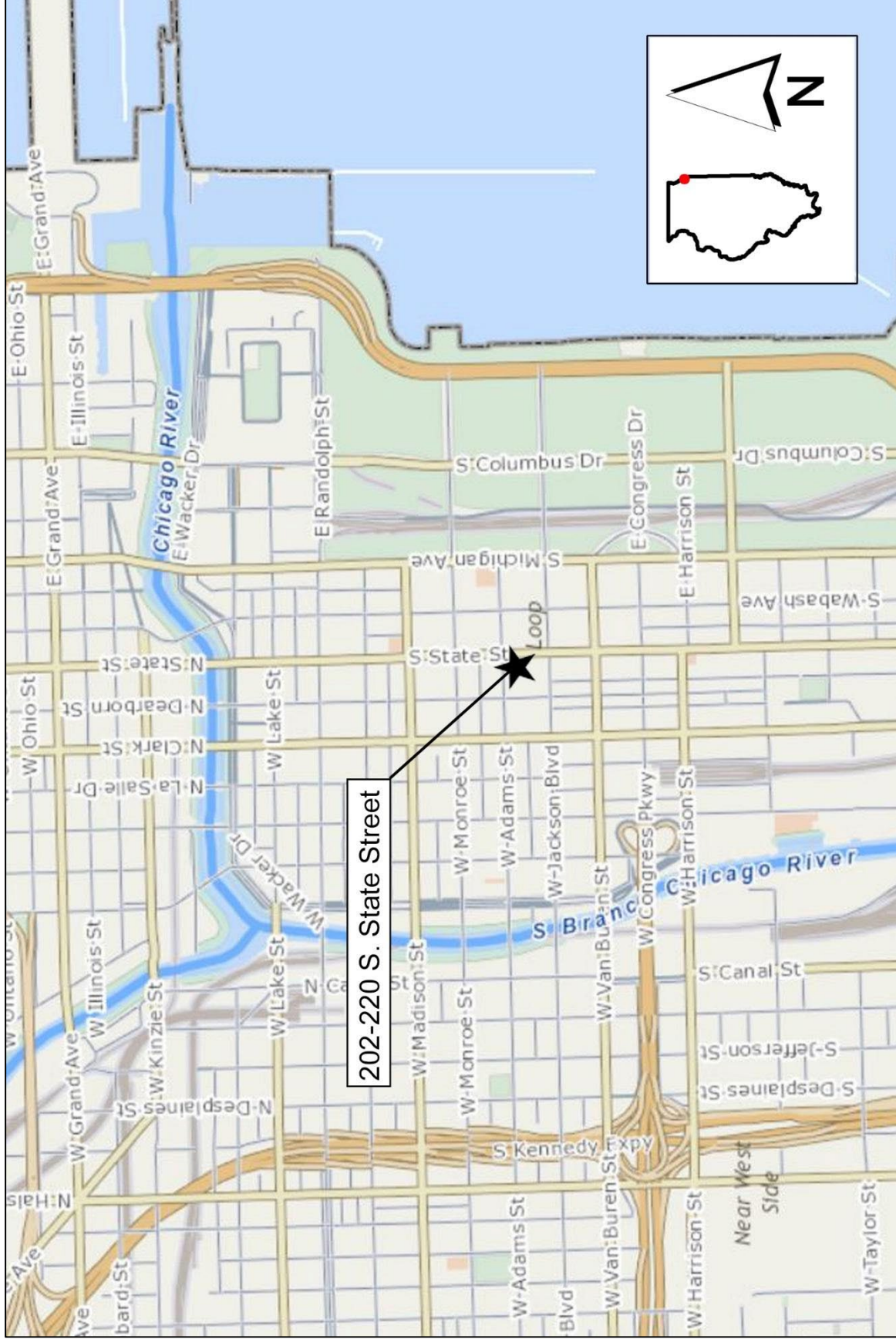


Figure 1. Project Location Map

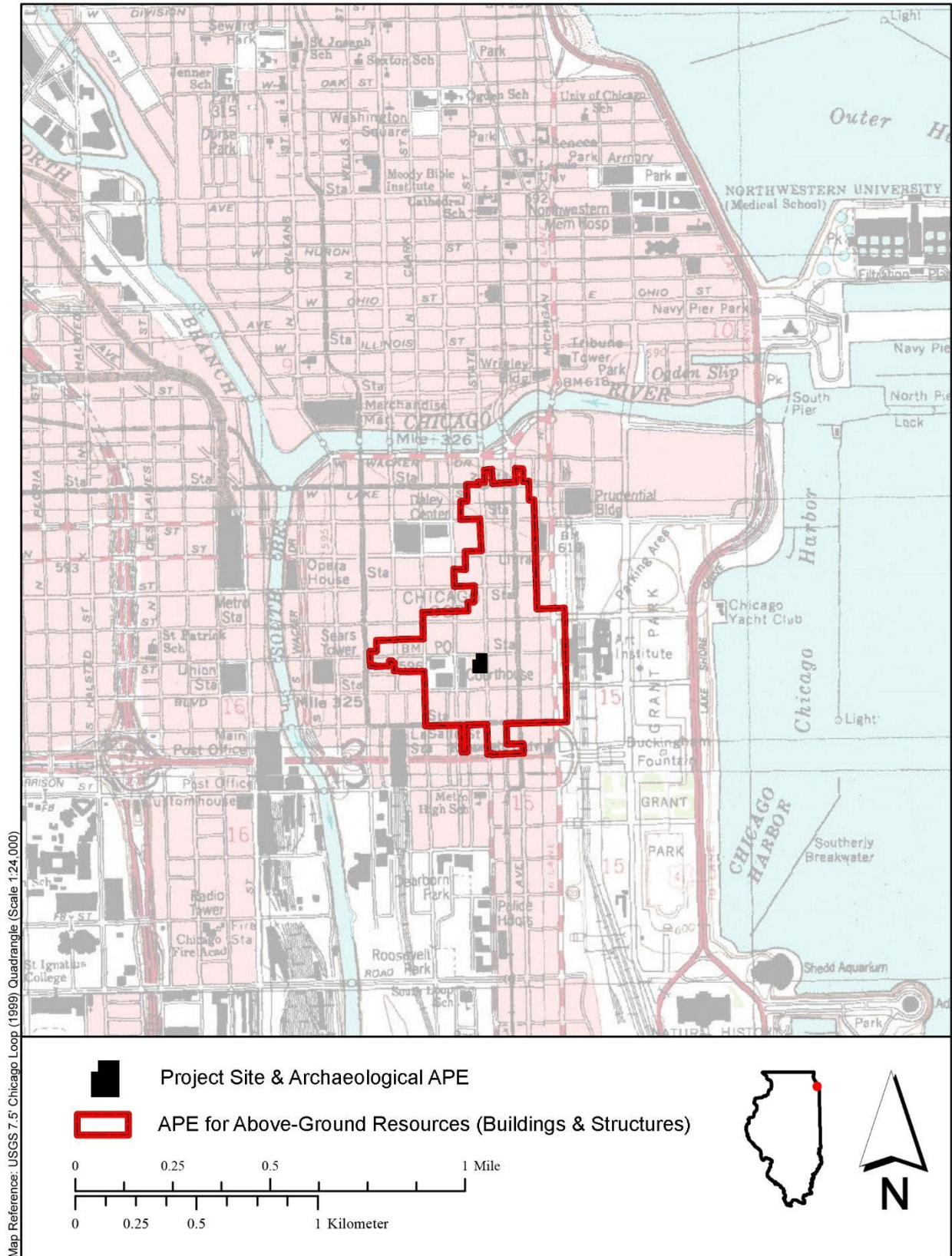


Figure 2. Area of Potential Effects



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).

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)

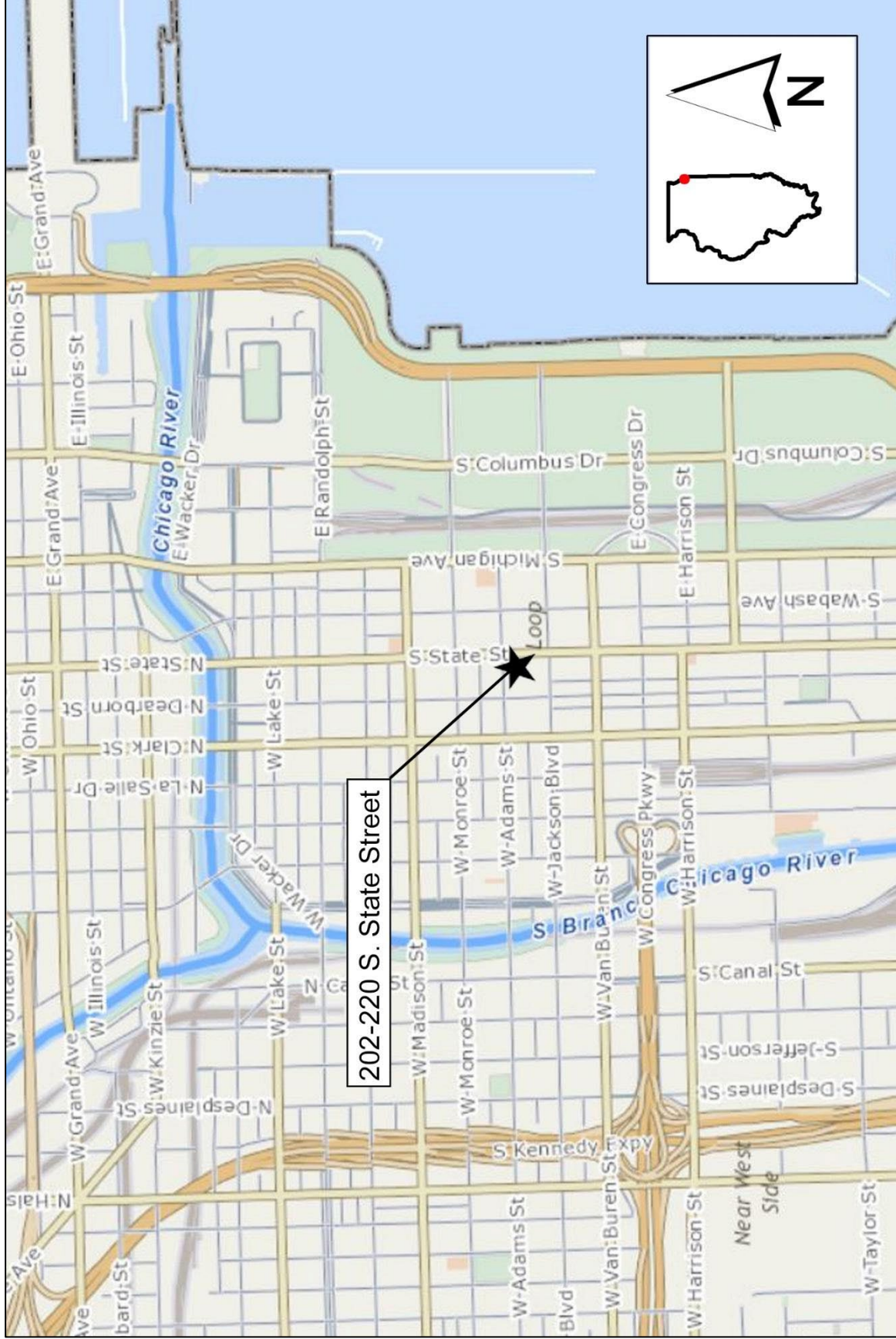


Figure 1. Project Location Map

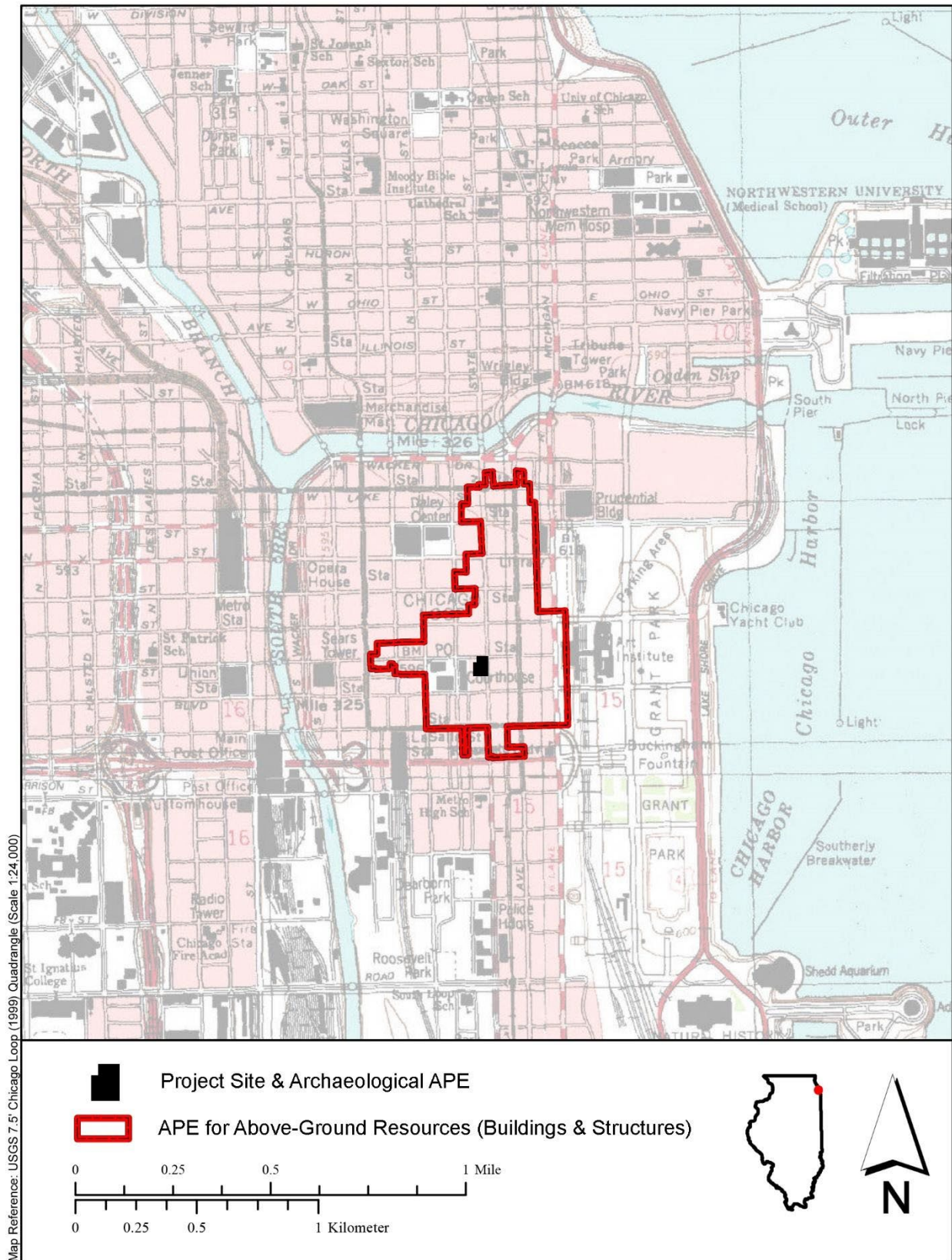


Figure 2. Area of Potential Effects



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,

 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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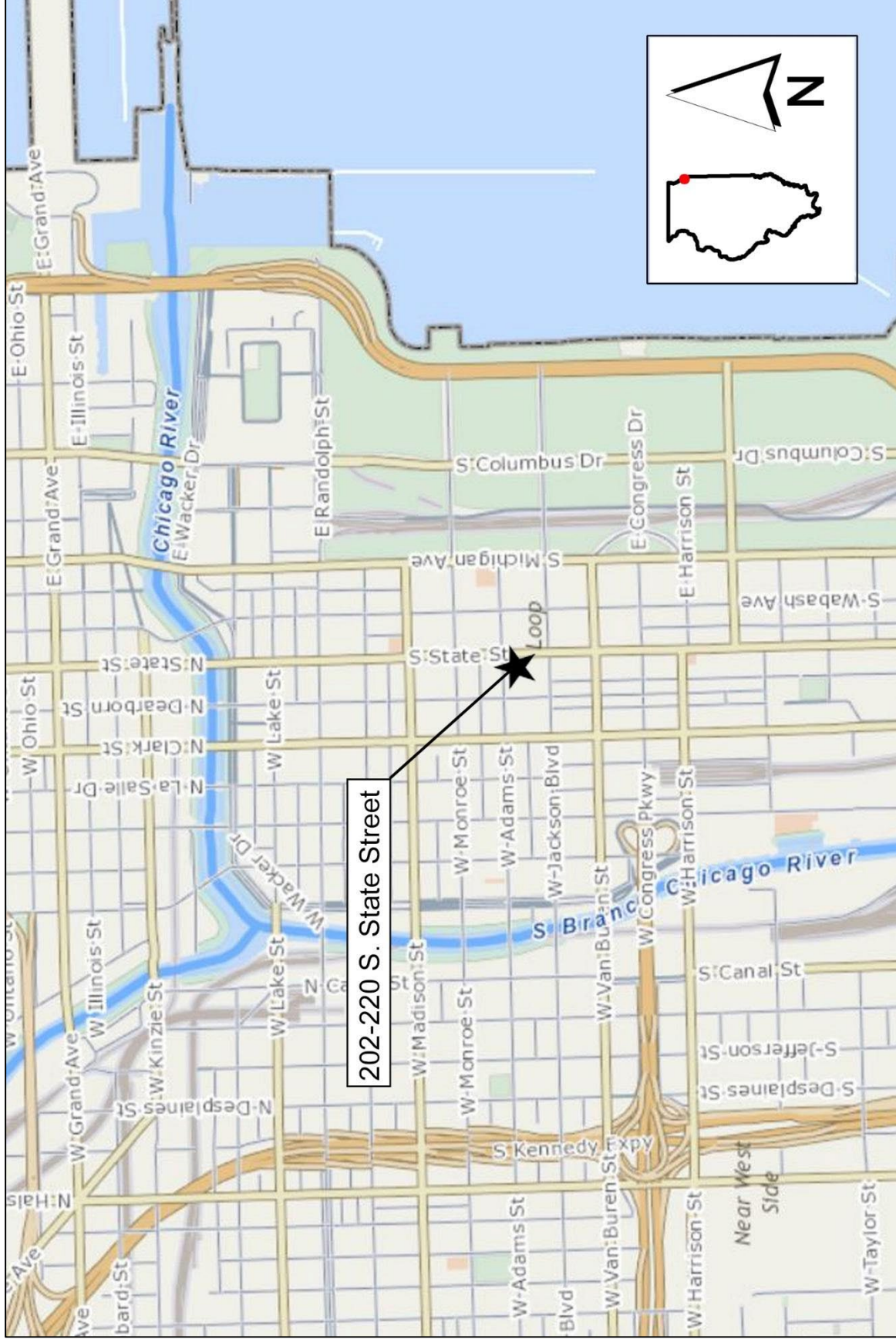


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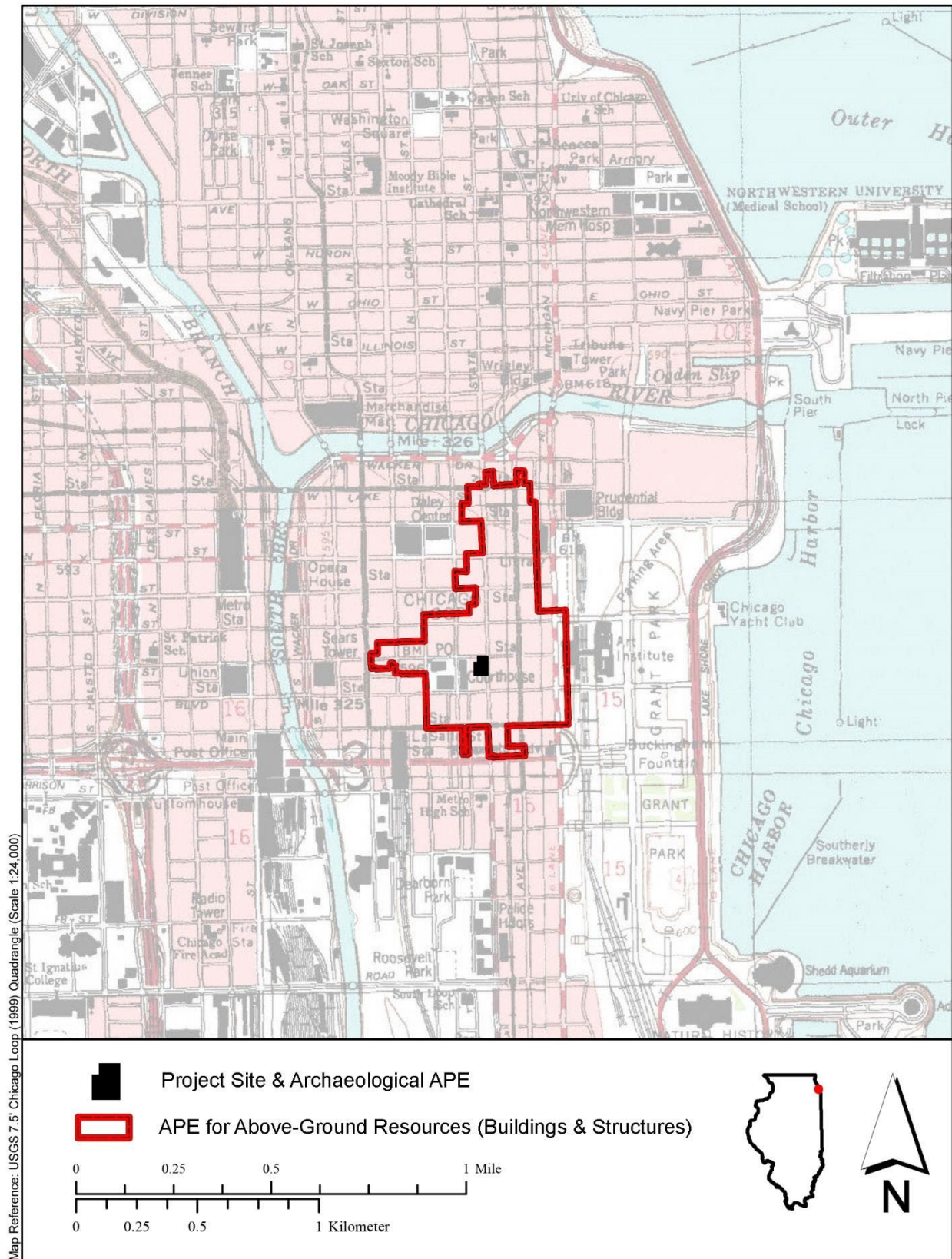


Figure 2. Area of Potential Effects



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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Tribal Communications Plan

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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)

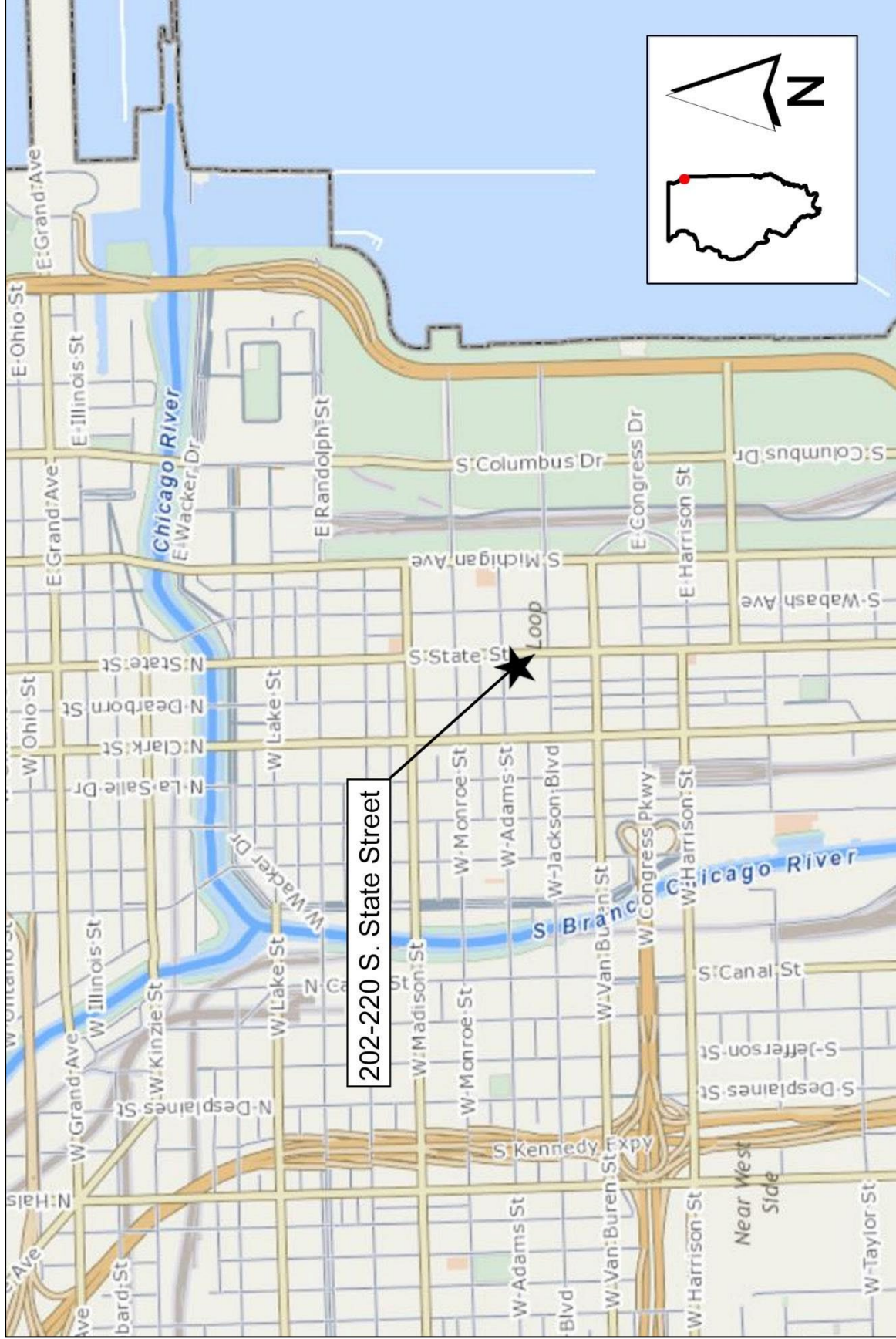


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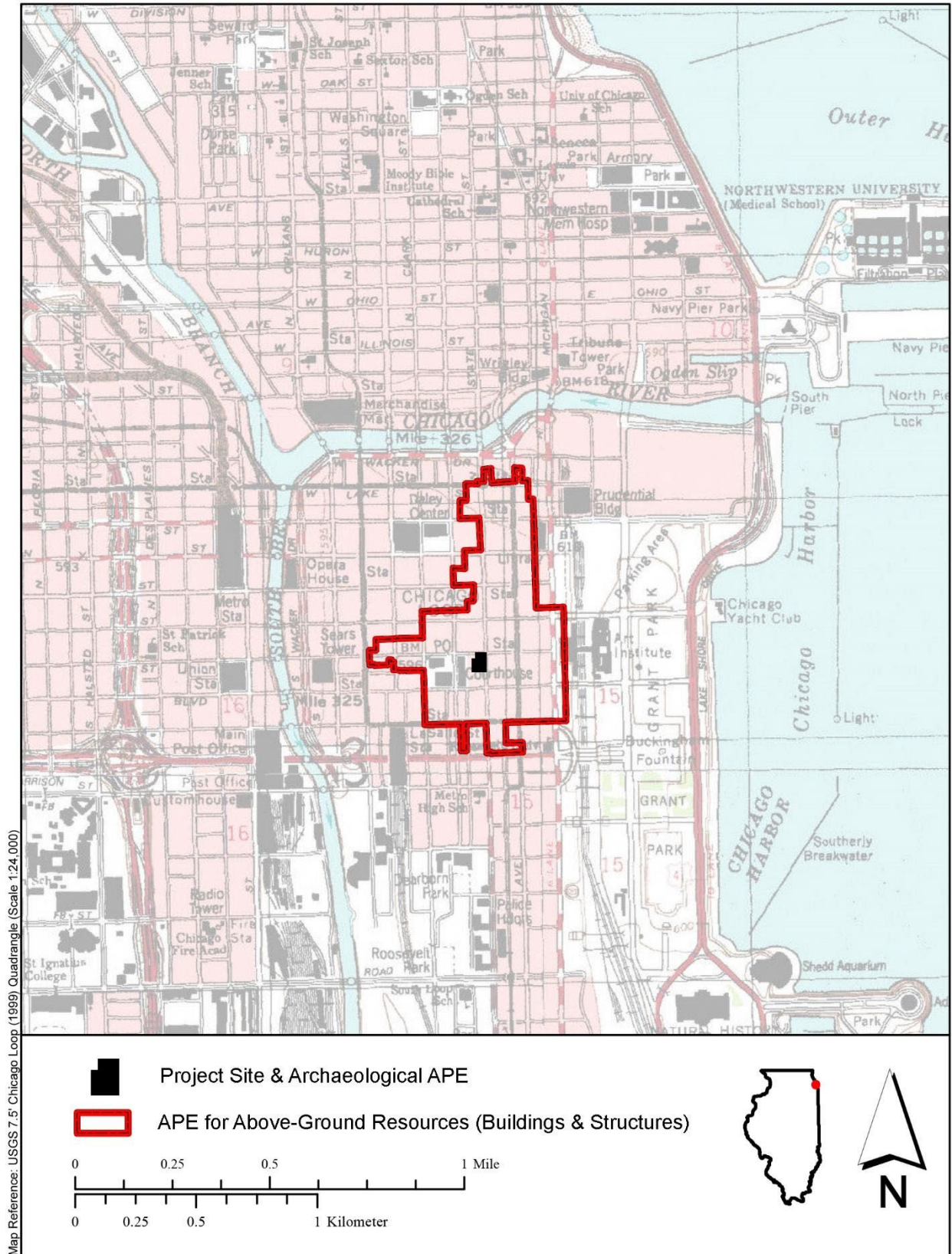


Figure 2. Area of Potential Effects



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

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).

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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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

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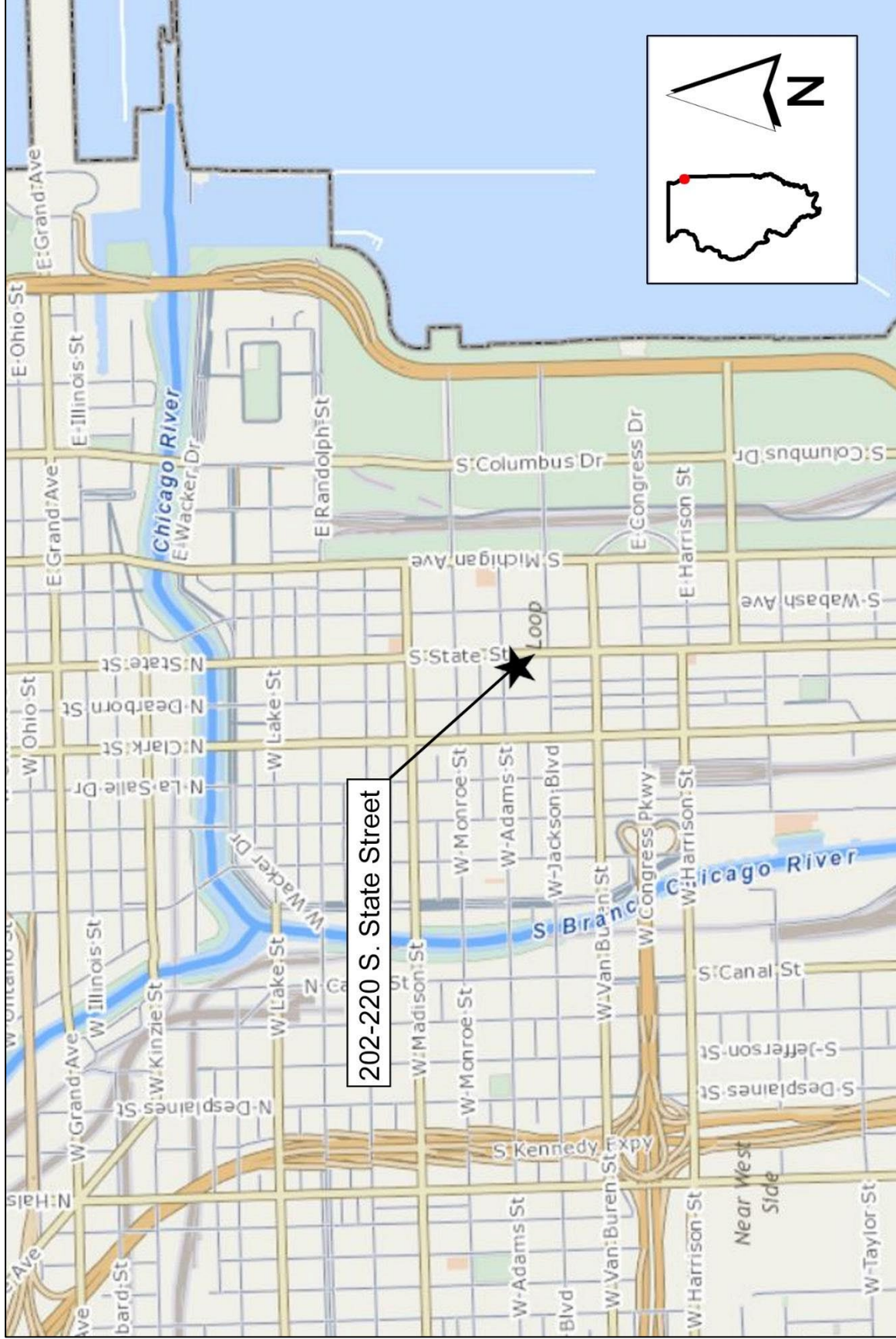


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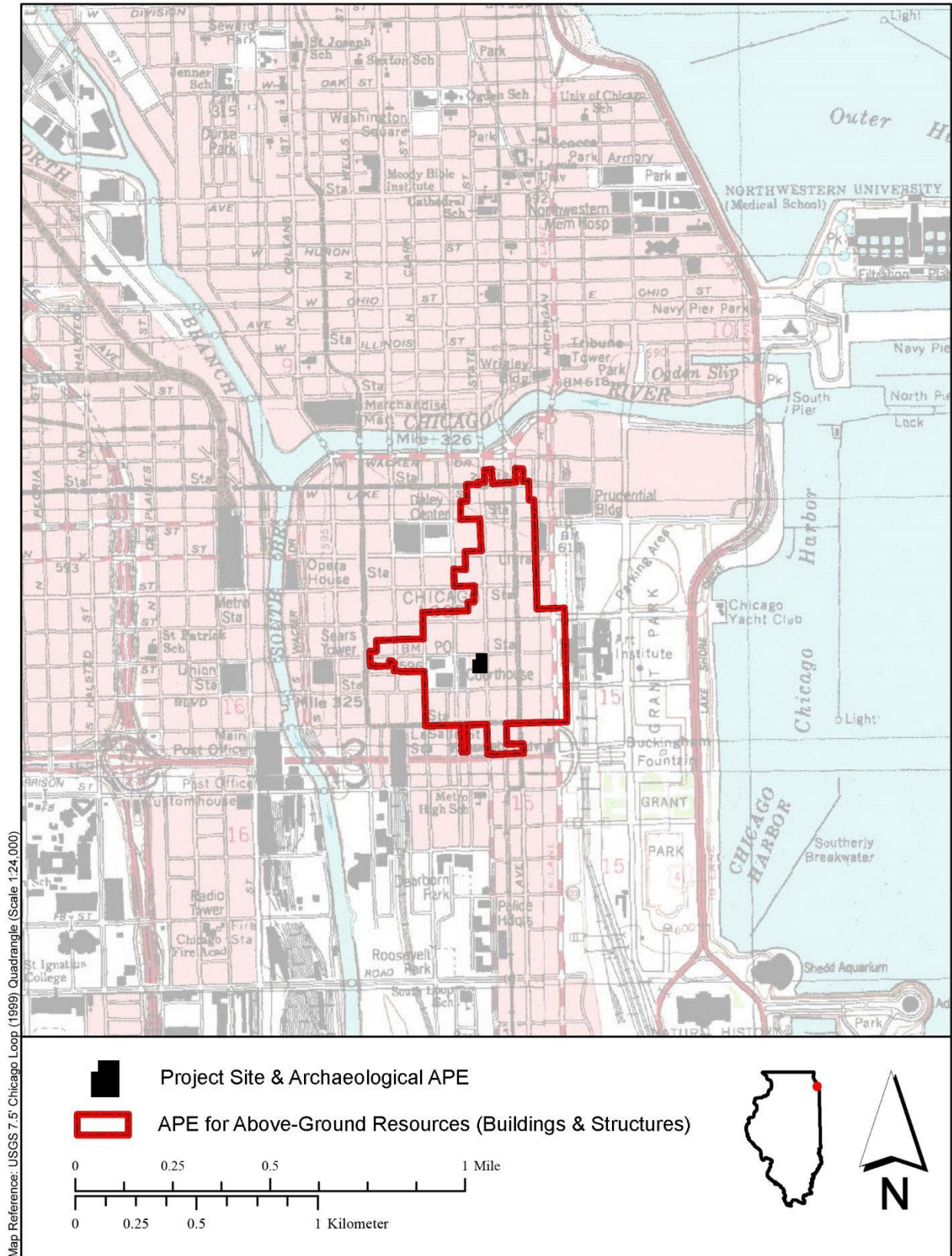


Figure 2. Area of Potential Effects



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.

Description of the Undertaking

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Tribal Communications Plan

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U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
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312-848-0266 (m)

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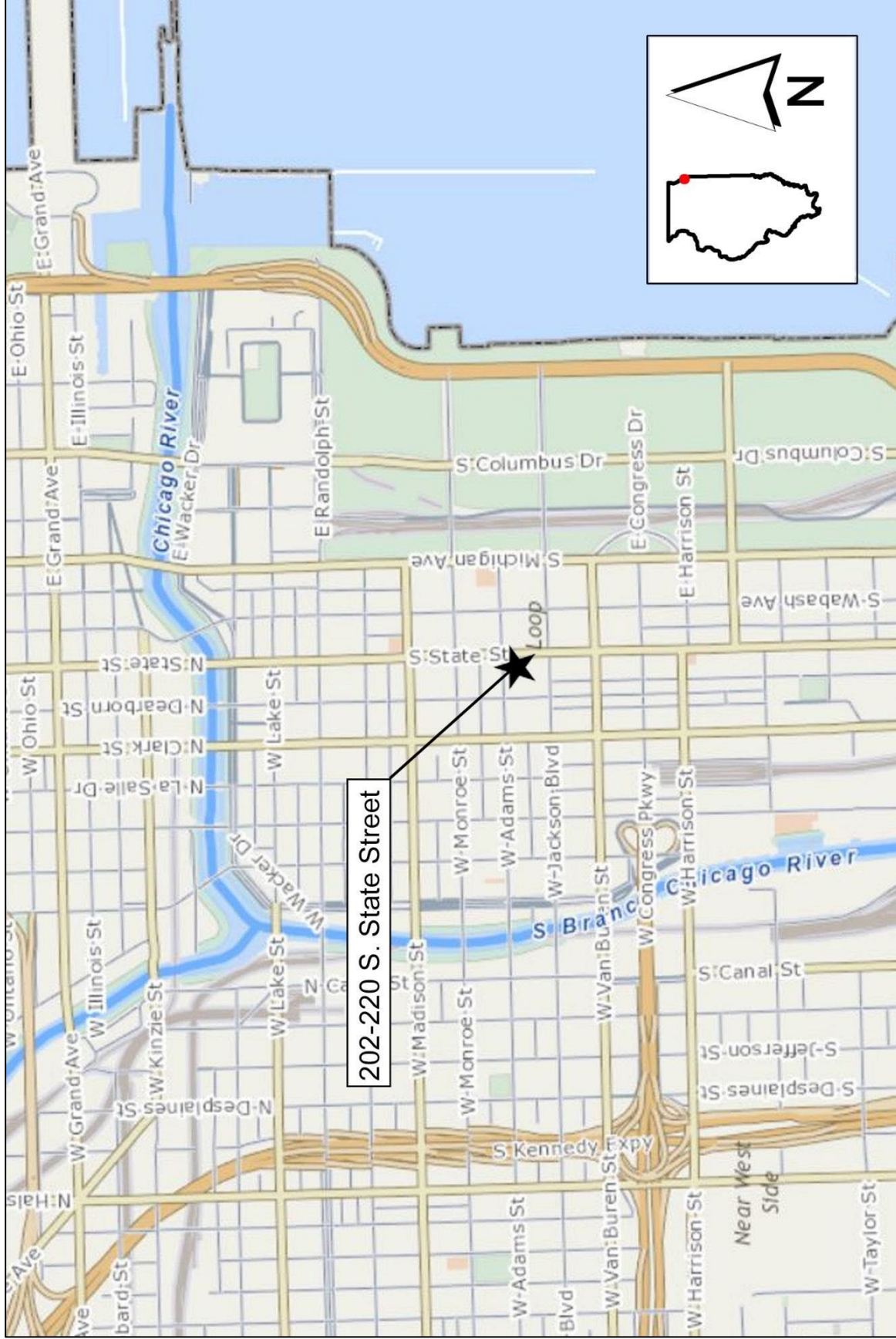
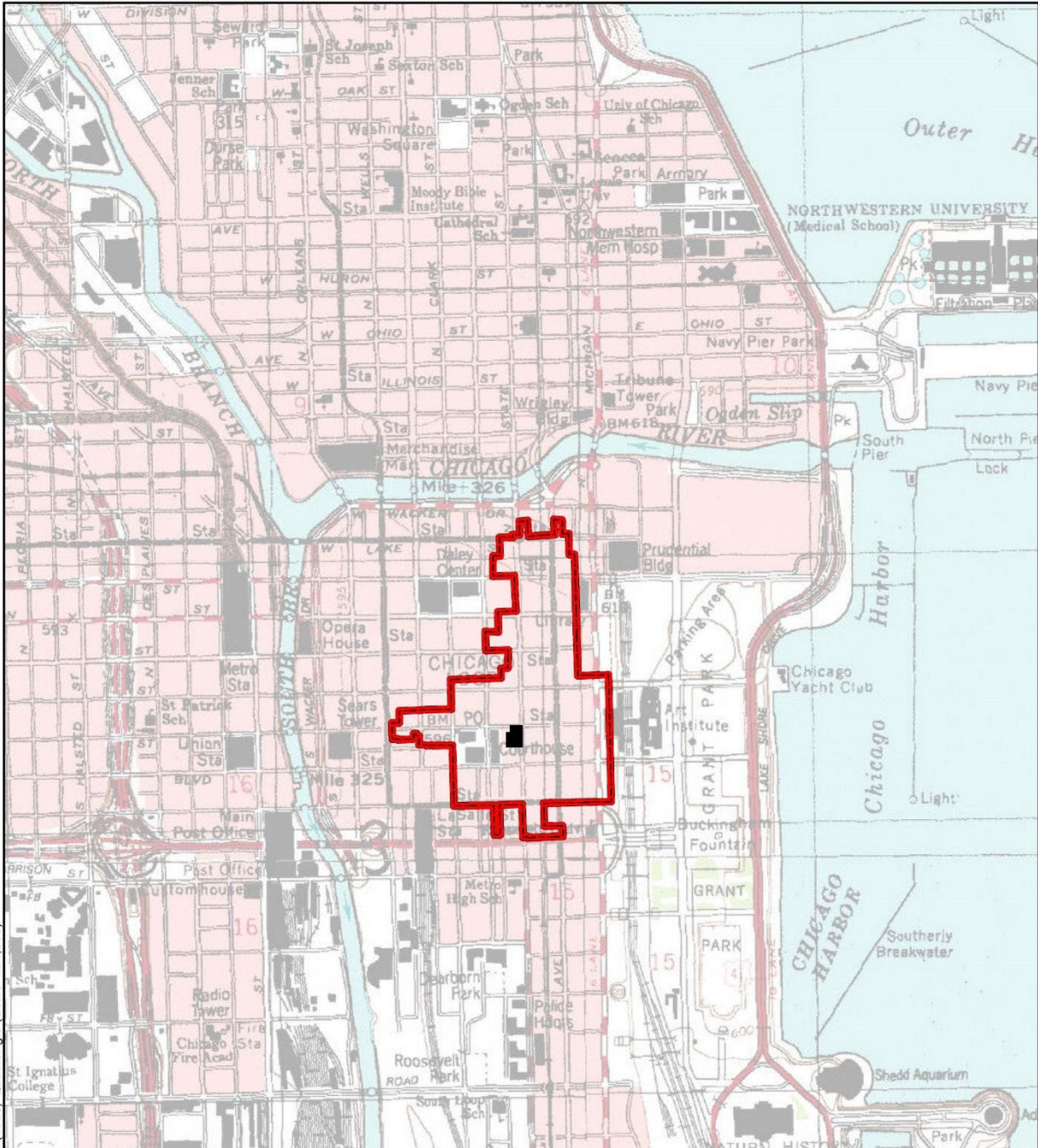


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Map Reference: USGS 7.5' Chicago Loop (1989) Quadrangle (Scale 1:24,000)

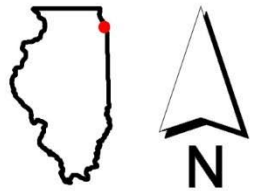
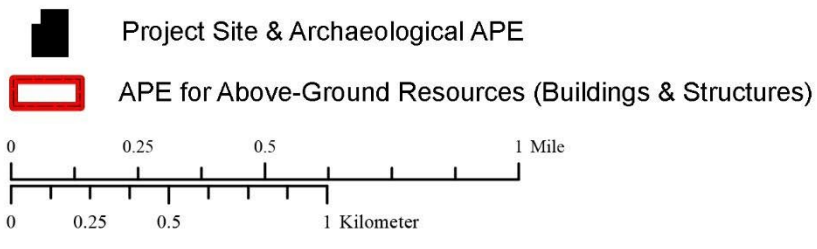


Figure 2. Area of Potential Effects



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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Regina A. Nally for

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U.S. General Services Administration
Public Buildings Service, Great Lakes Region
230 S. Dearborn, Suite 3600
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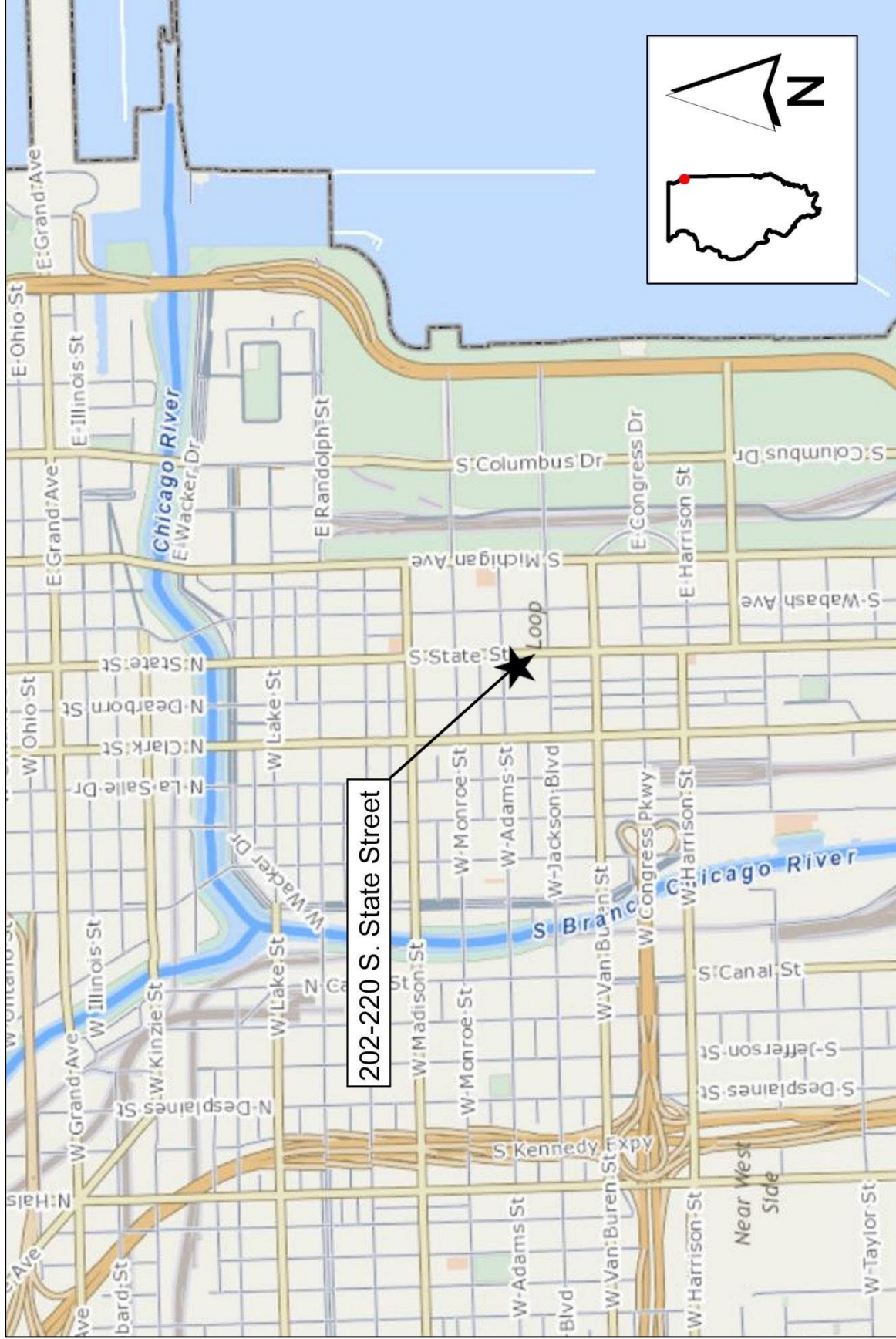
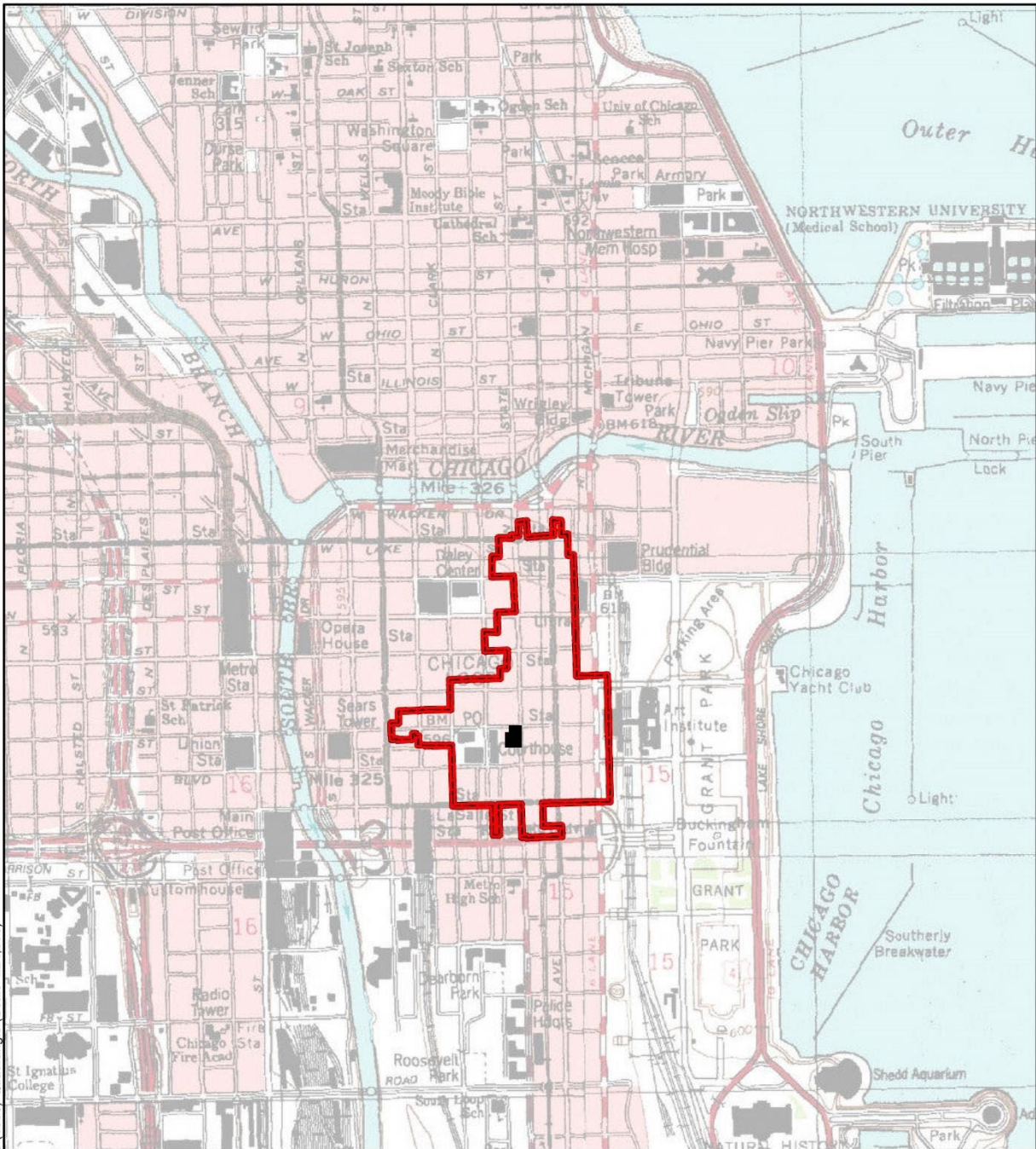




Figure 1. Project Location Map



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

-  Project Site & Archaeological APE
-  APE for Above-Ground Resources (Buildings & Structures)

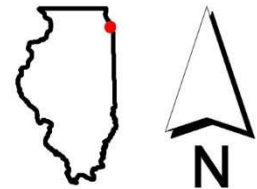
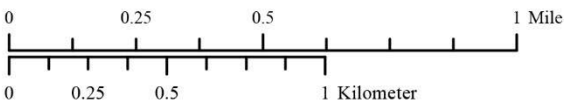


Figure 2. Area of Potential Effects



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:

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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)

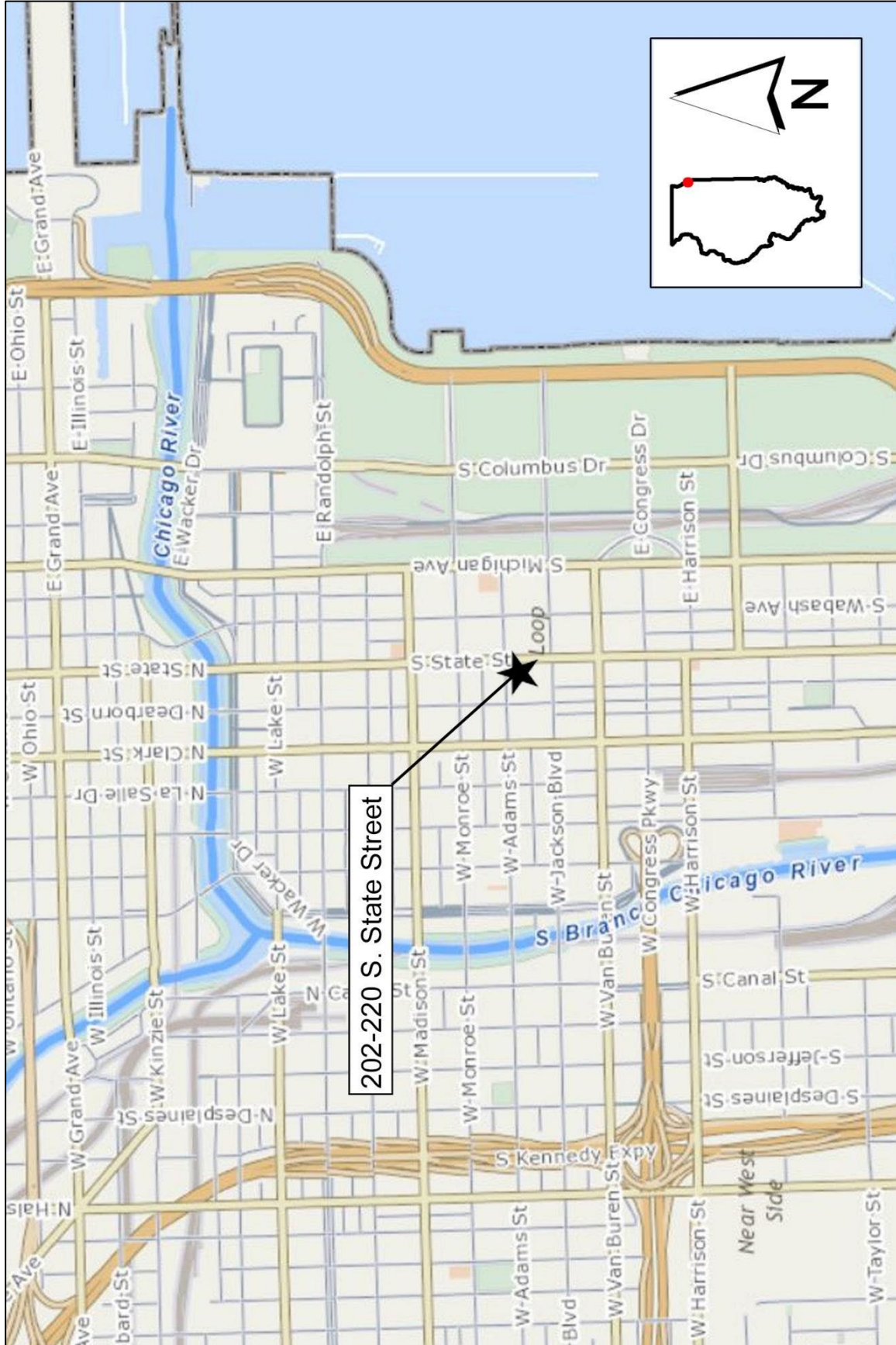


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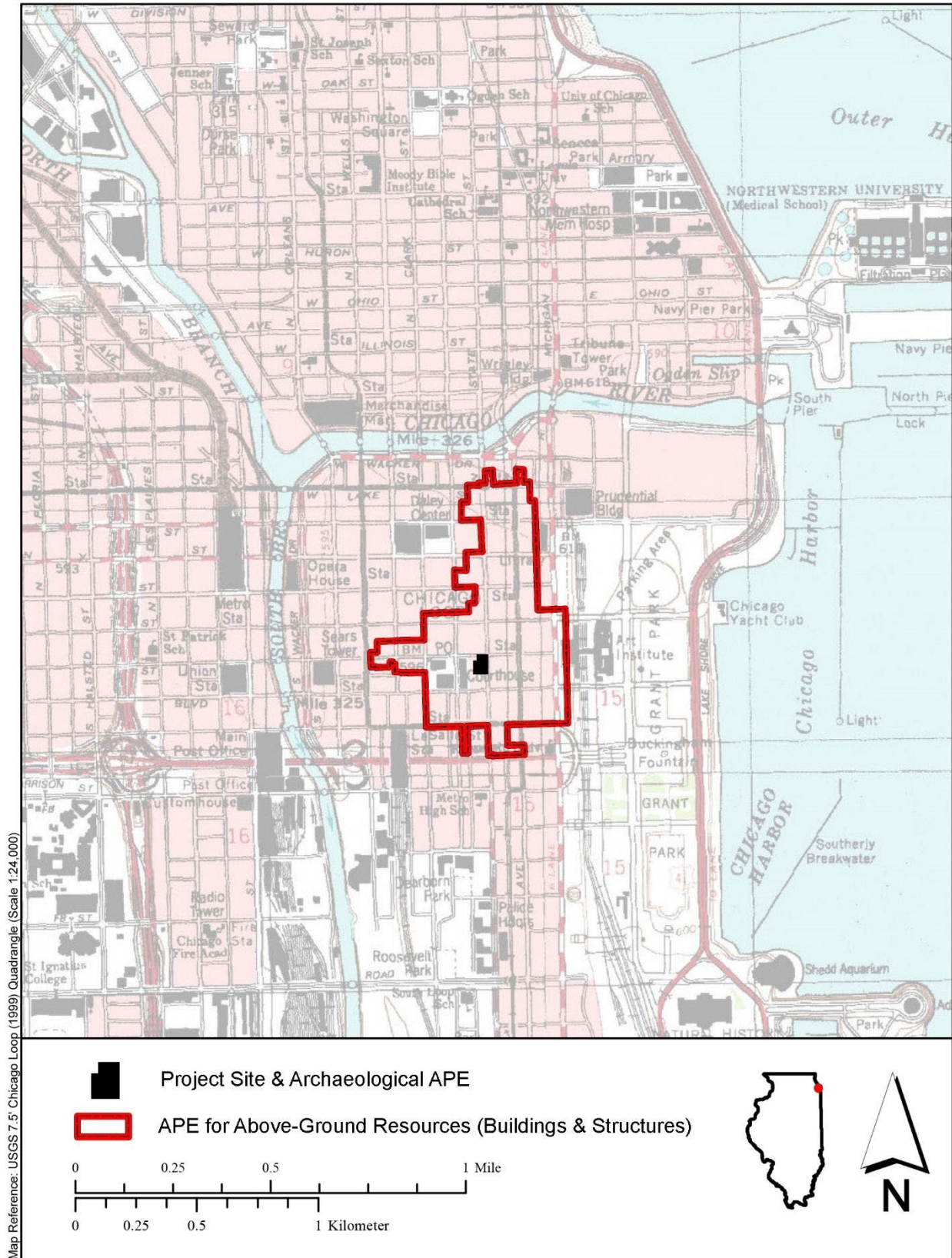


Figure 2. Area of Potential Effects



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

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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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:

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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

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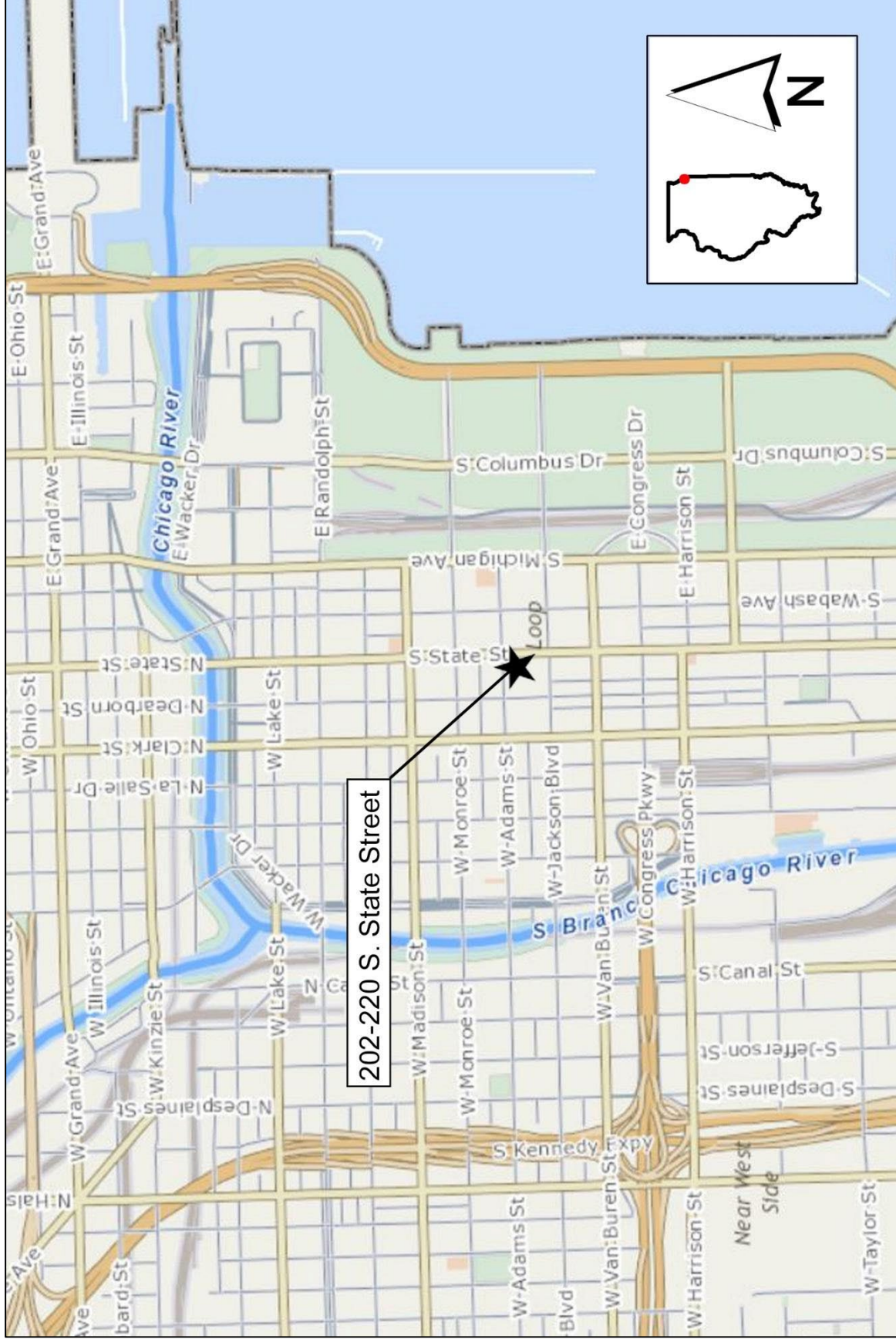


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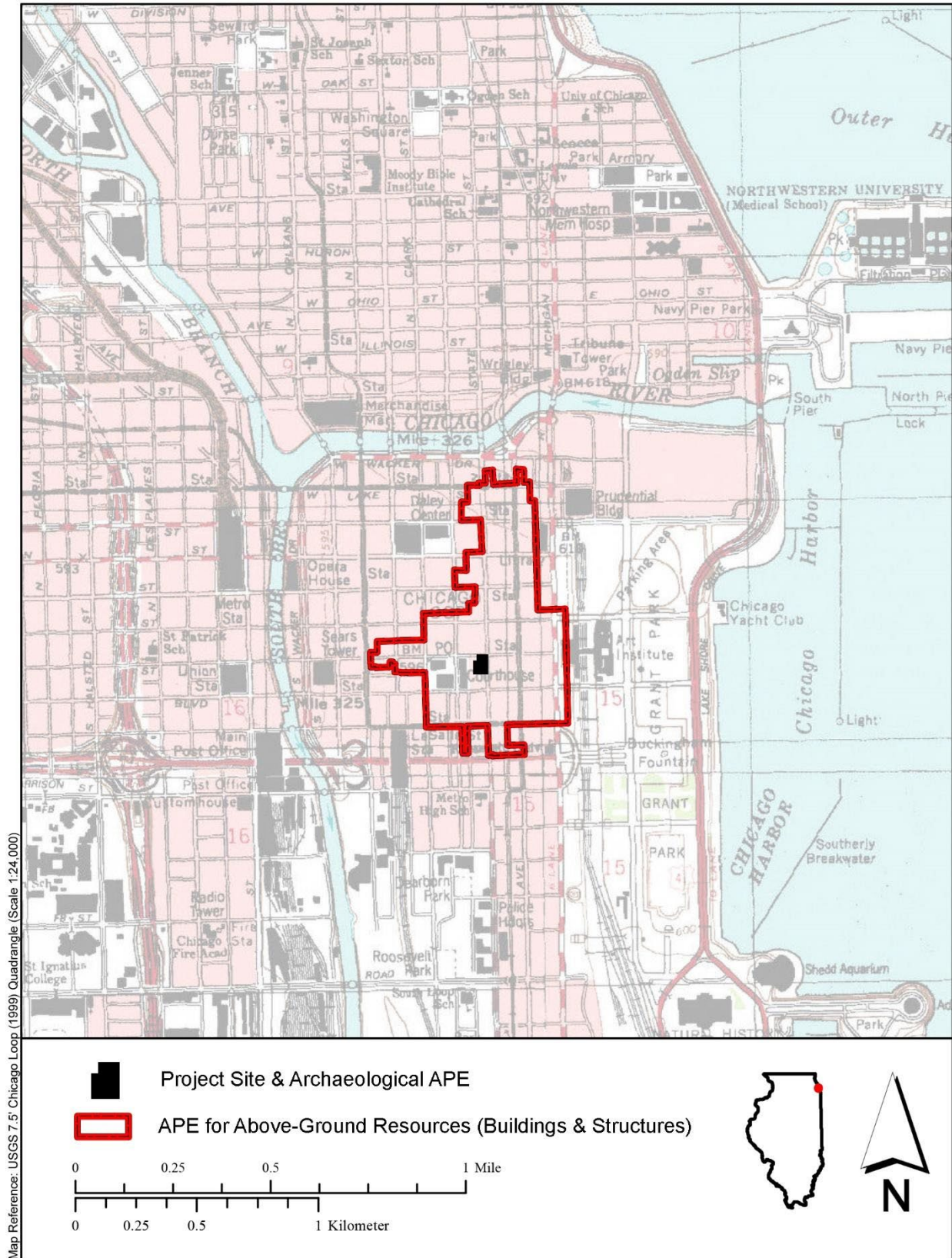


Figure 2. Area of Potential Effects



U.S. General Services Administration

January 5, 2023

Via Email: chiefharper@peoriatribe.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:

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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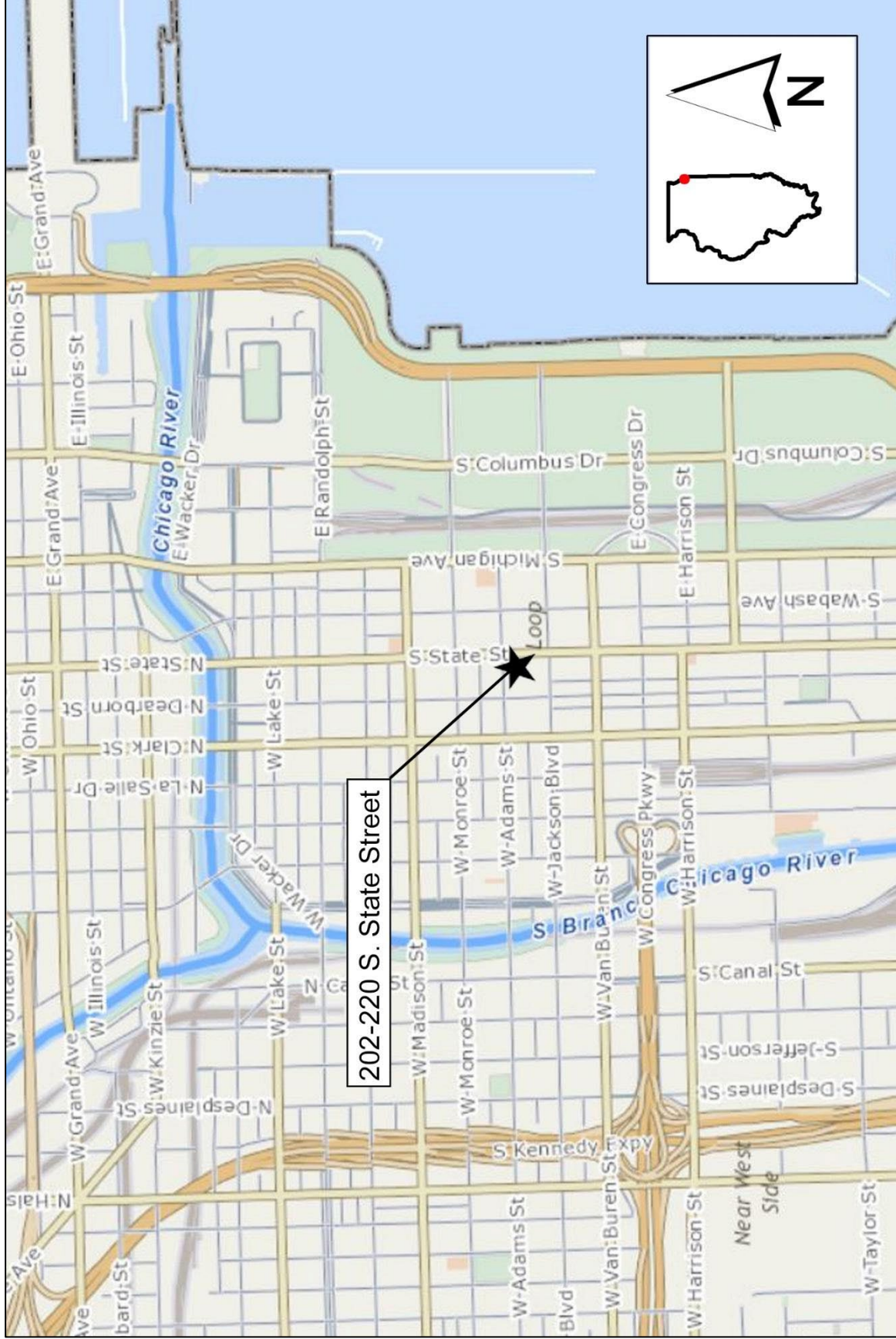


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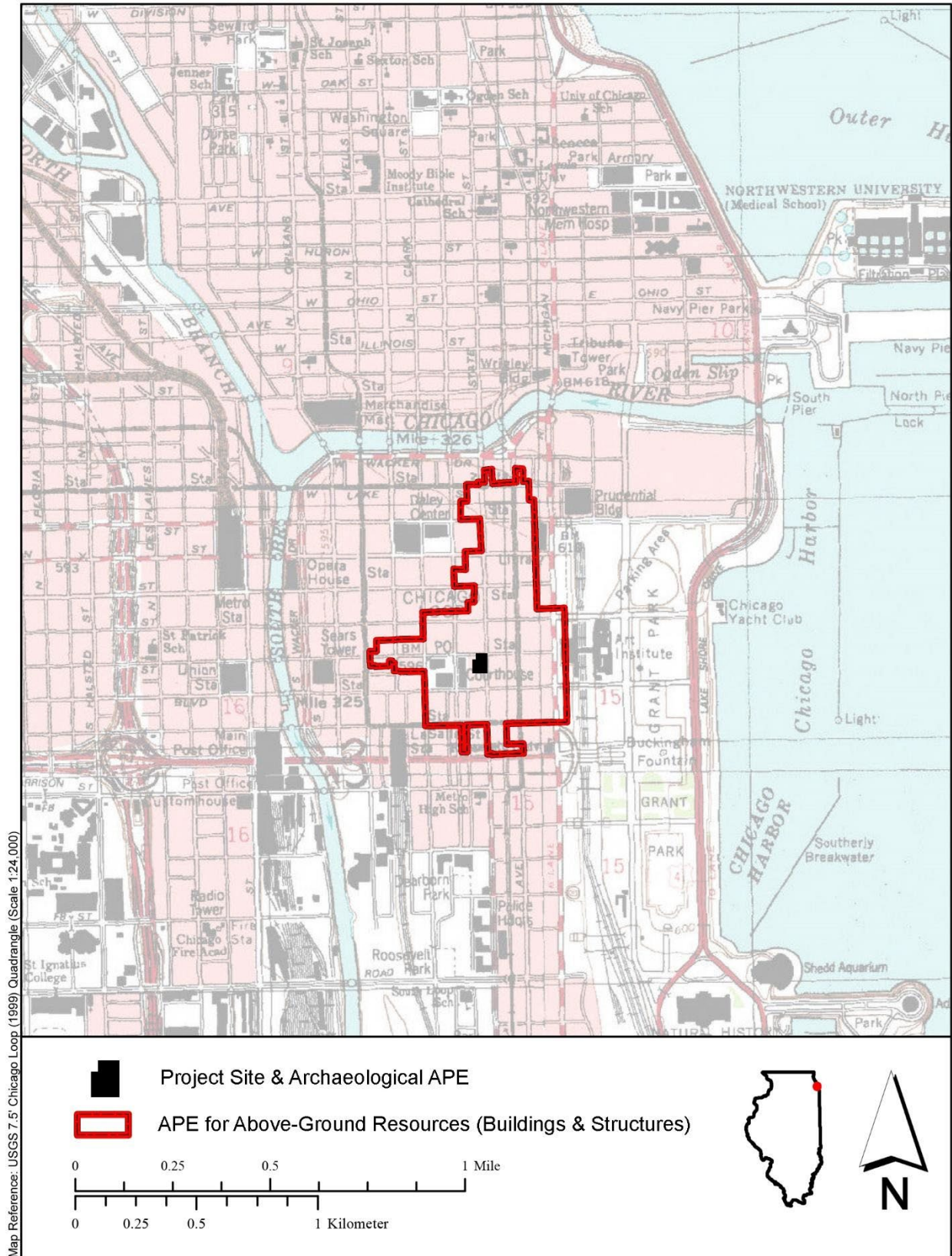


Figure 2. Area of Potential Effects



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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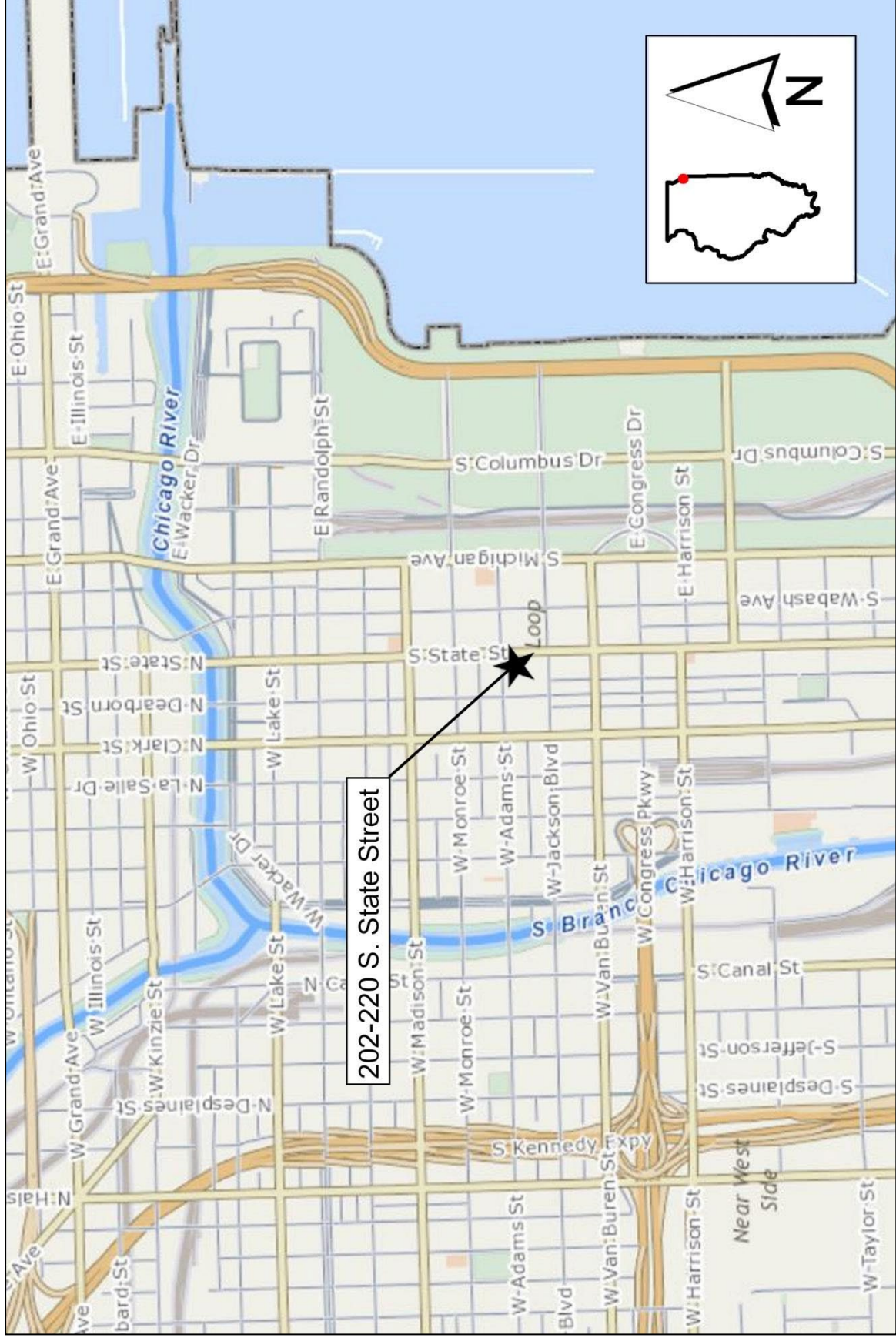
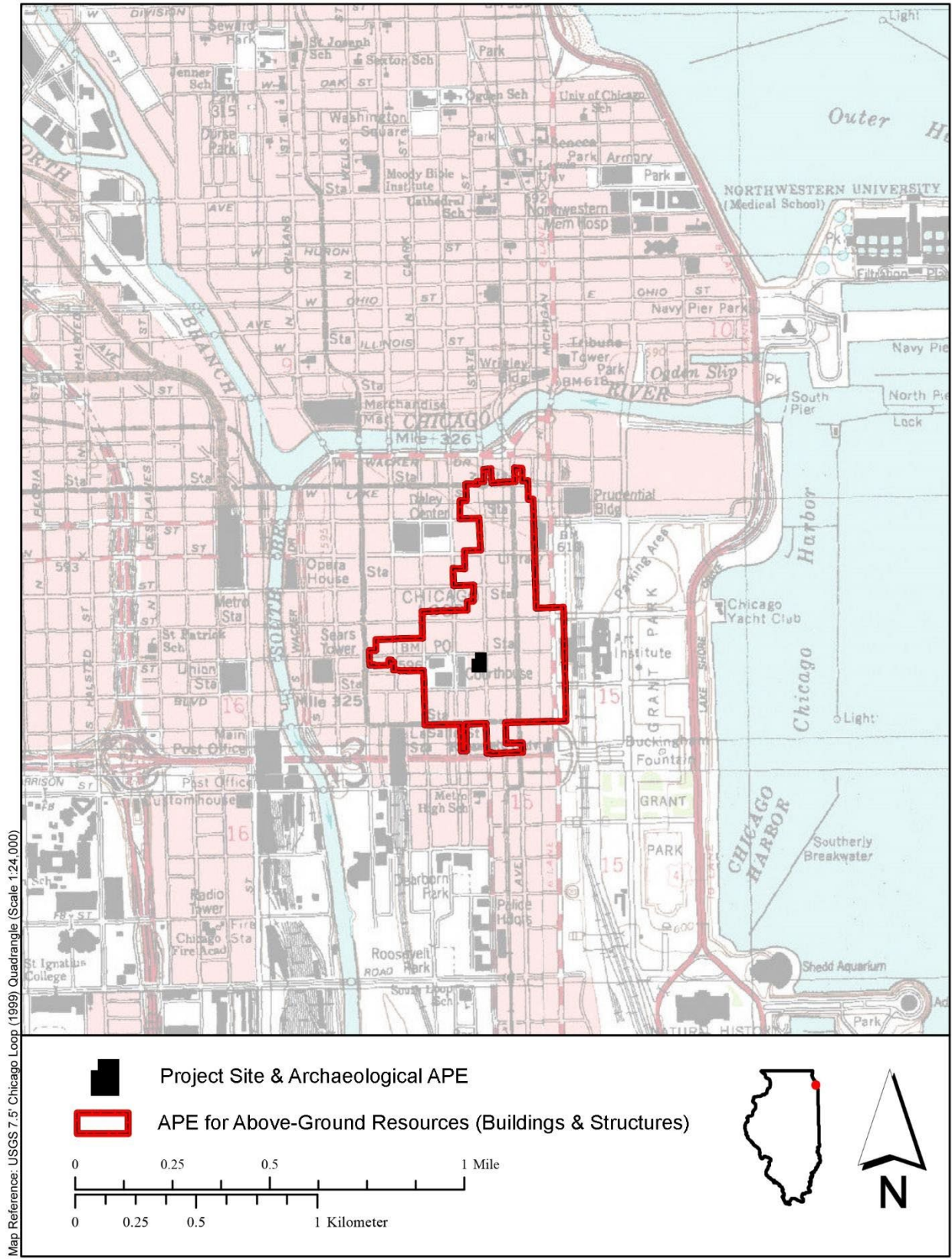


Figure 1. Project Location Map



Map Reference: USGS 7.5' Chicago Loop (1989) Quadrangle (Scale 1:24,000)

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:

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

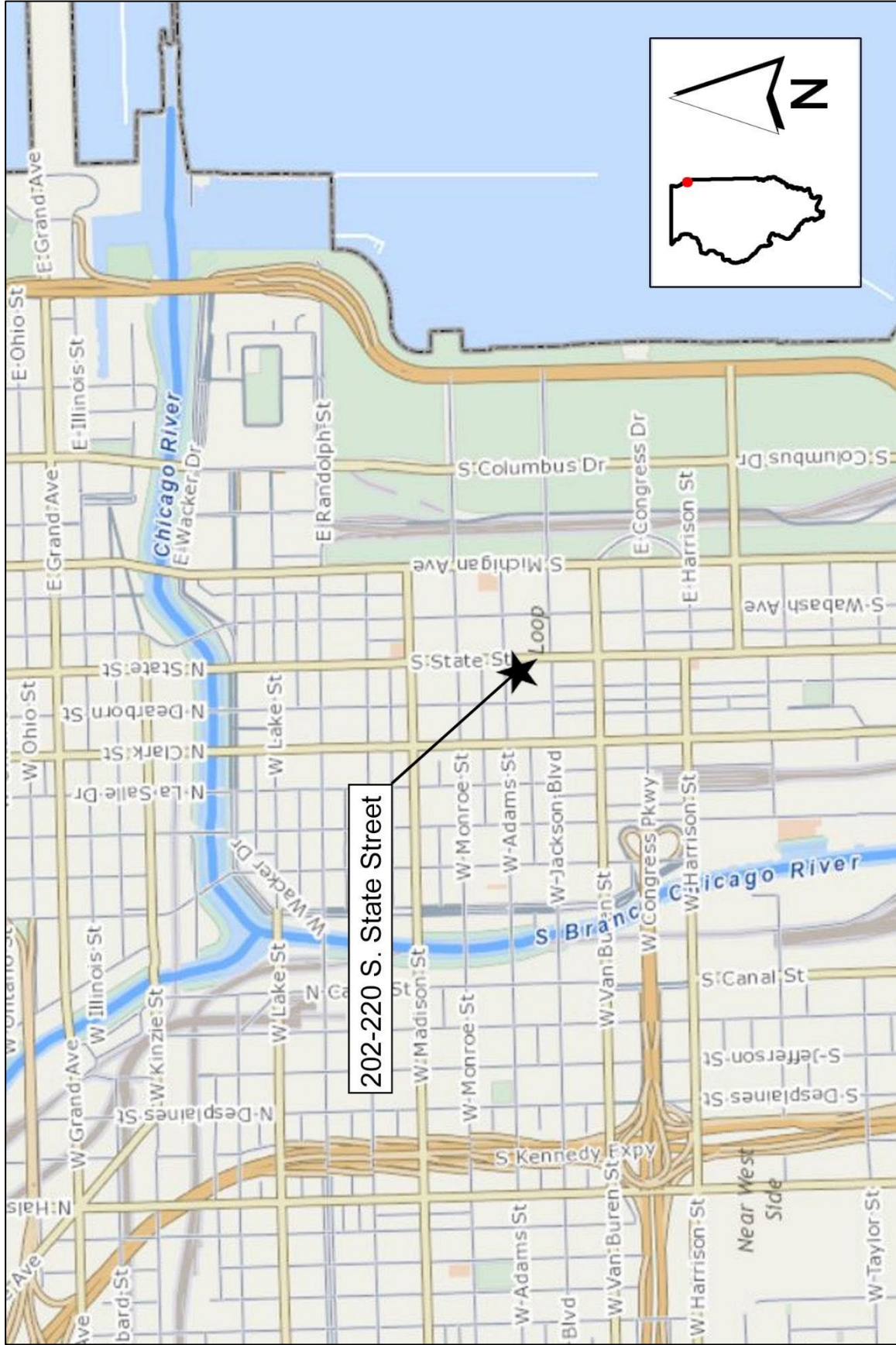


Figure 1. Project Location Map

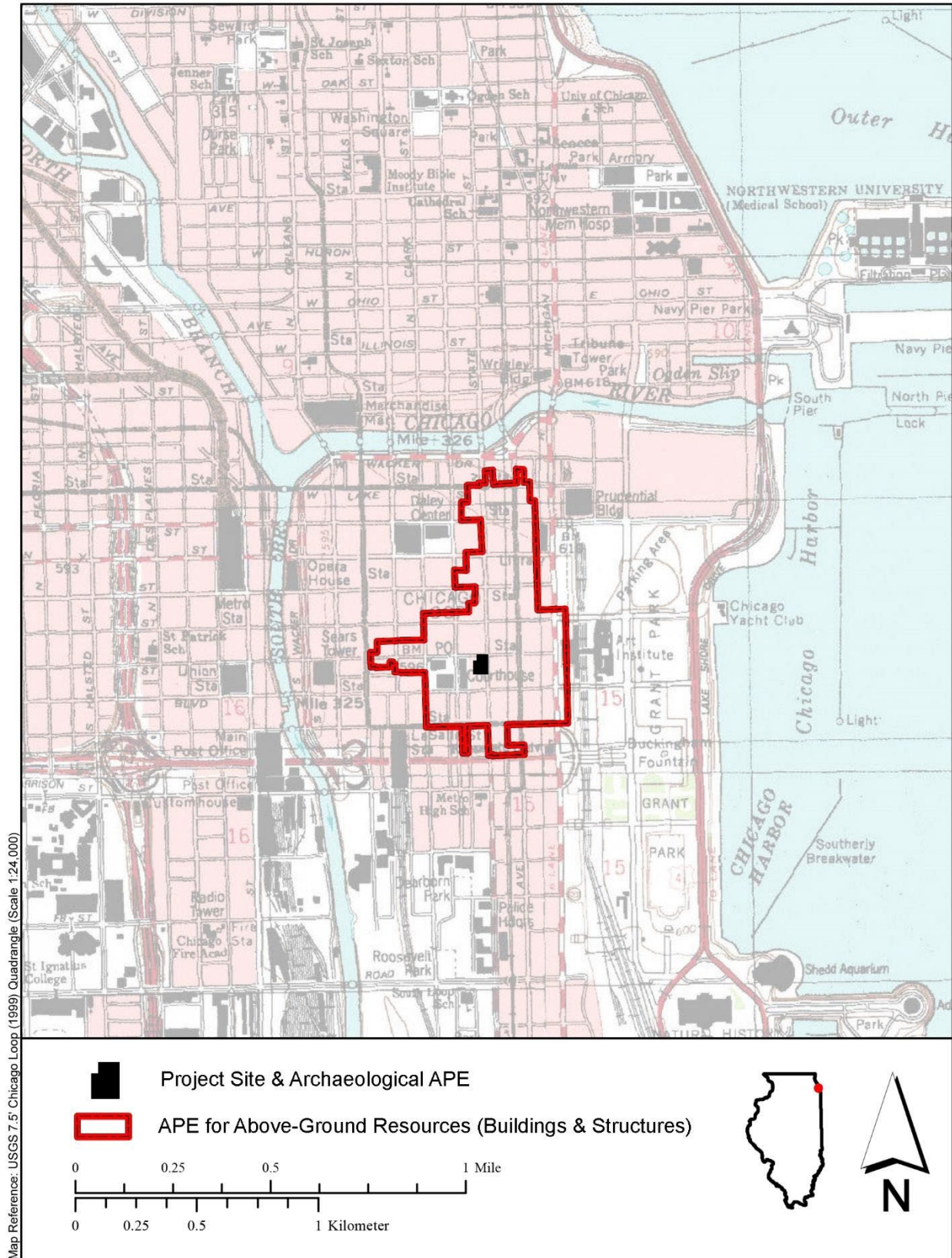


Figure 2. Area of Potential Effects



U.S. General Services Administration

January 5, 2023

Via Email: 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

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)

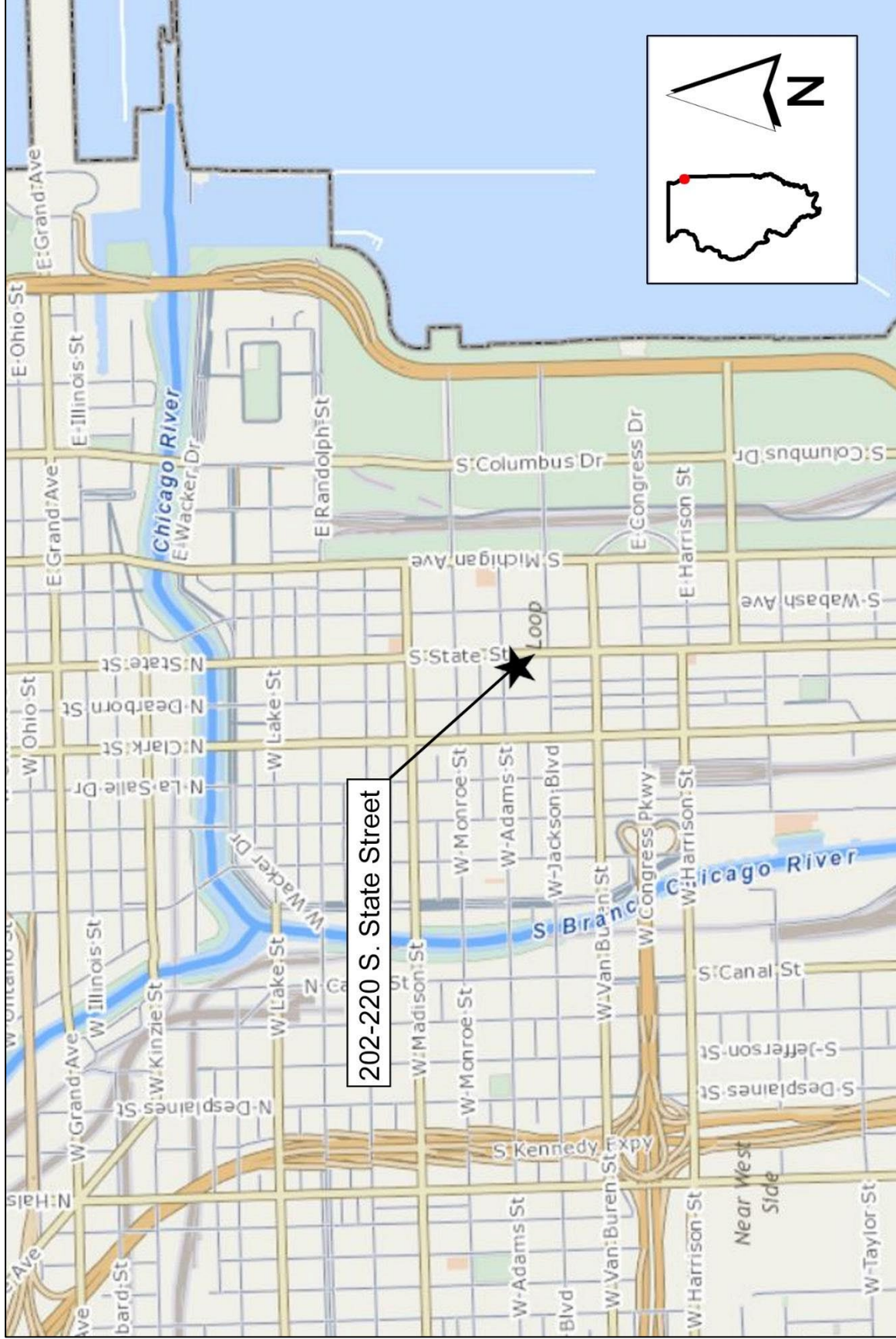


Figure 1. Project Location Map

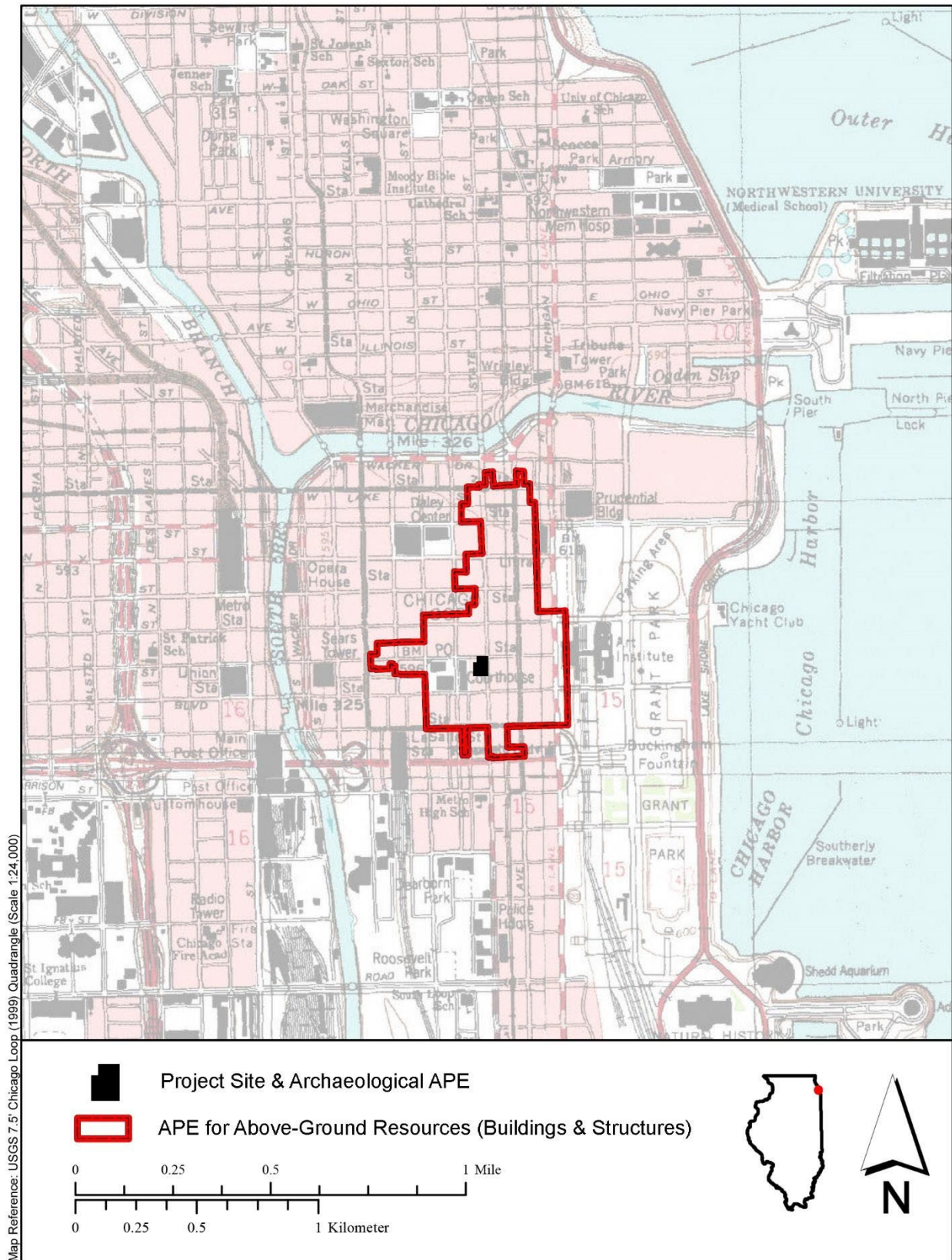


Figure 2. Area of Potential Effects



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

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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". The signature is written in a cursive style.

**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

B3. List of Consulting Parties

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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
- Chris Koeppel, 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
- Ciere Boatright, 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
- William Conway, 34th Ward Alderman, City of Chicago
- Eiliesh Tuffy, Commission on Chicago Landmarks
- Will Panoke, U.S. Bureau of Alcohol Tobacco and Firearms, Department of Justice
- Robert Cantrell, U.S. Federal Protective Service, Department of Homeland Security
- Erik Martinez, Senior Legislative Assistant for Intergovernmental Affairs, City of Chicago
- Christopher Hoey, Senior Federal Legislative Assistant, Office of the Mayor, City of Chicago

Native American Tribes

- Tracy Wind, Tribal Historic Preservation Officer (THPO), Citizen Potawatomi Nation, Oklahoma
- Olivia Nunway, THPO, Forest County Potawatomi Community of Wisconsin
- Kenneth Meshigaud, Chairperson, Hannahville Indian Community, Michigan

List of Consulting Parties

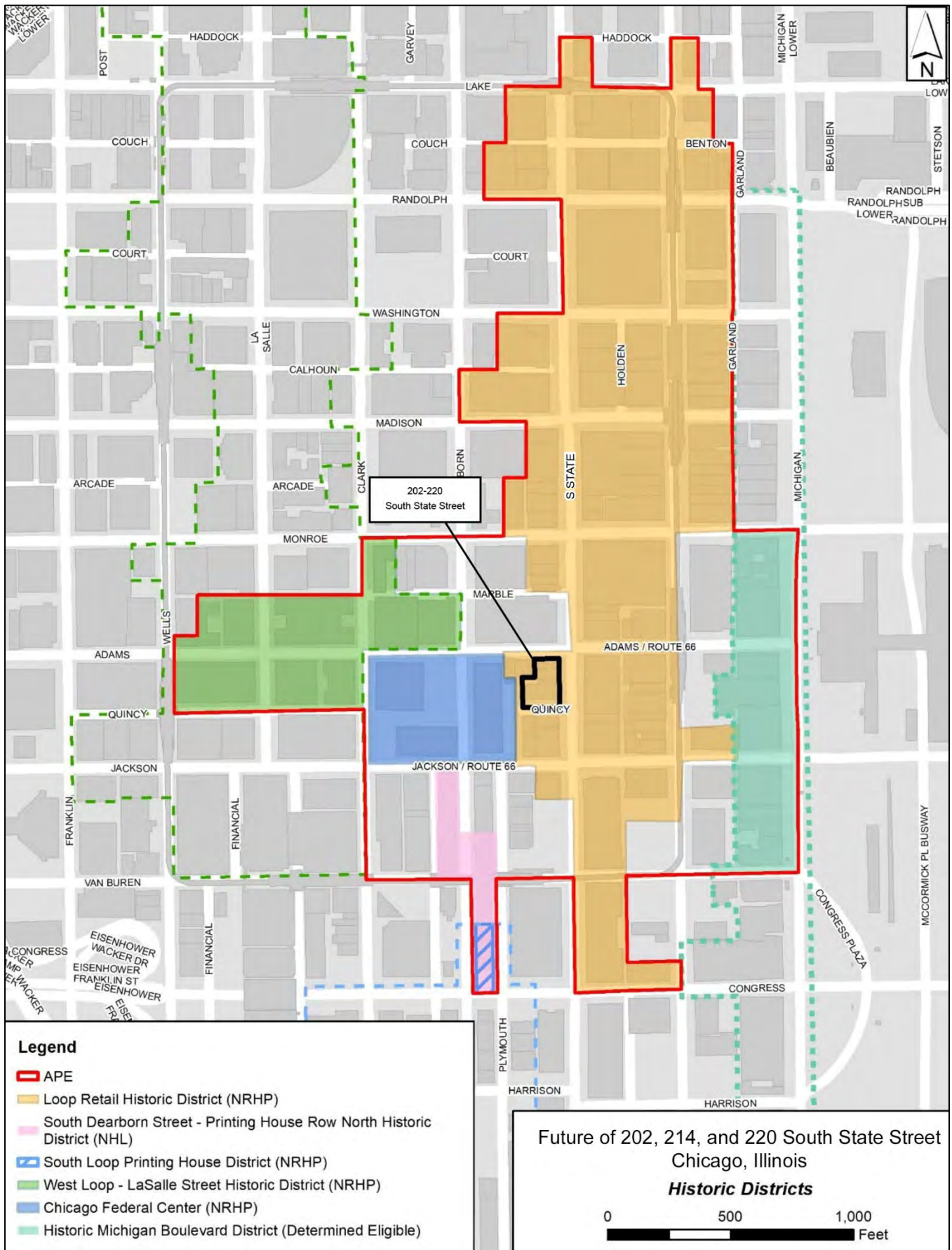
- Darwin Kaskaske, Chairman, Kickapoo Tribe of Oklahoma
- Winnay Wemigwase, THPO, Little Traverse Bay Bands of Odawa Indians, Michigan
- David Grignon, THPO, Menominee Indian Tribe of Wisconsin
- Logan York, THPO, Miami Tribe of Oklahoma
- Raphael Wahwassuck, THPO, Prairie Band Potawatomi Nation
- Bill Quackenbush, THPO, Ho-Chunk Nation
- Burgundy Fletcher, Historic Preservation Specialist, Peoria Tribe of Indians of Oklahoma
- Johnathon Buffalo, Historic Preservation Director, Sac and Fox Nation of Mississippi in Iowa
- Tiauna Carnes, Chairperson, Sac and Fox Nation of Missouri
- Randle Carter, Principal Chief, Sac and Fox Nation of Oklahoma

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
- Dirk Lohan, 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
- Rolf Achilles, Mies van der Rohe Society of the Illinois Institute of Technology
- Brie Matin, Provincial Archivist, Our Lady of Guadalupe Province
- Brad White, Interested Party

B4. Inventory of Resources in the Area of Potential Effects

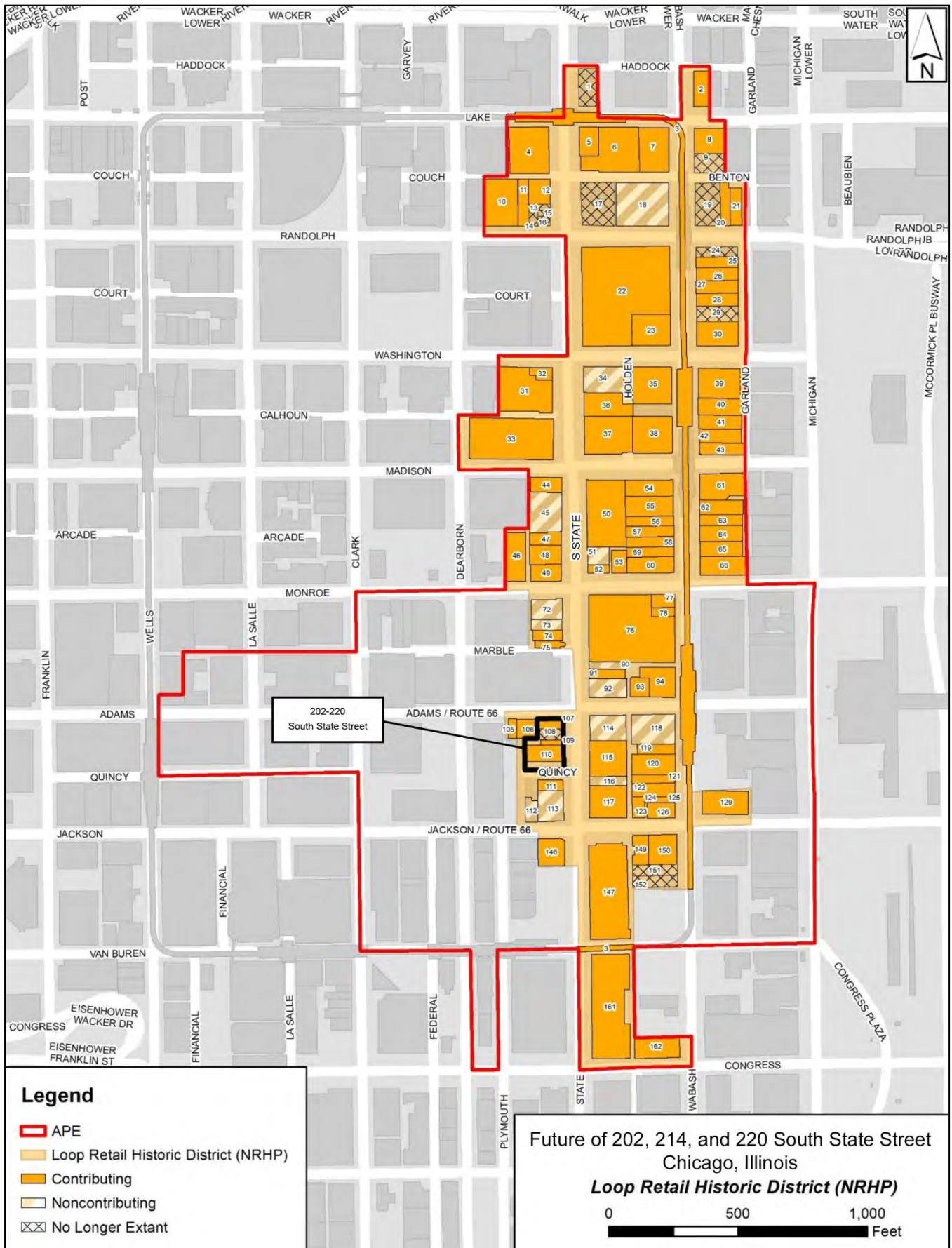
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Map 1. Historic Districts in the APE

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 | Alternative A: Adverse Effects 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 | Alternative A: Adverse Effects 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






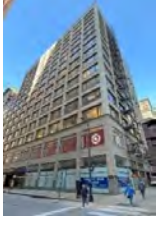
| Map Ref# | Property Name | Location/Address | Building Type/Use | Date(s) of Construction and Architect (if known) | Architectural Style | NRHP Eligibility | Photo | Preliminary Effects Assessment |
|----------|--|--|-------------------|---|----------------------------|--|---|---|
| 55 | Silversmith 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


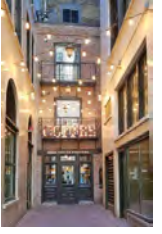




| Map Ref# | Property Name | Location/Address | Building Type/Use | Date(s) of Construction and Architect (if known) | Architectural Style | NRHP Eligibility | Photo | Preliminary Effects Assessment |
|----------|--|---|---------------------------------|---|---------------------|------------------|---|---|
| 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






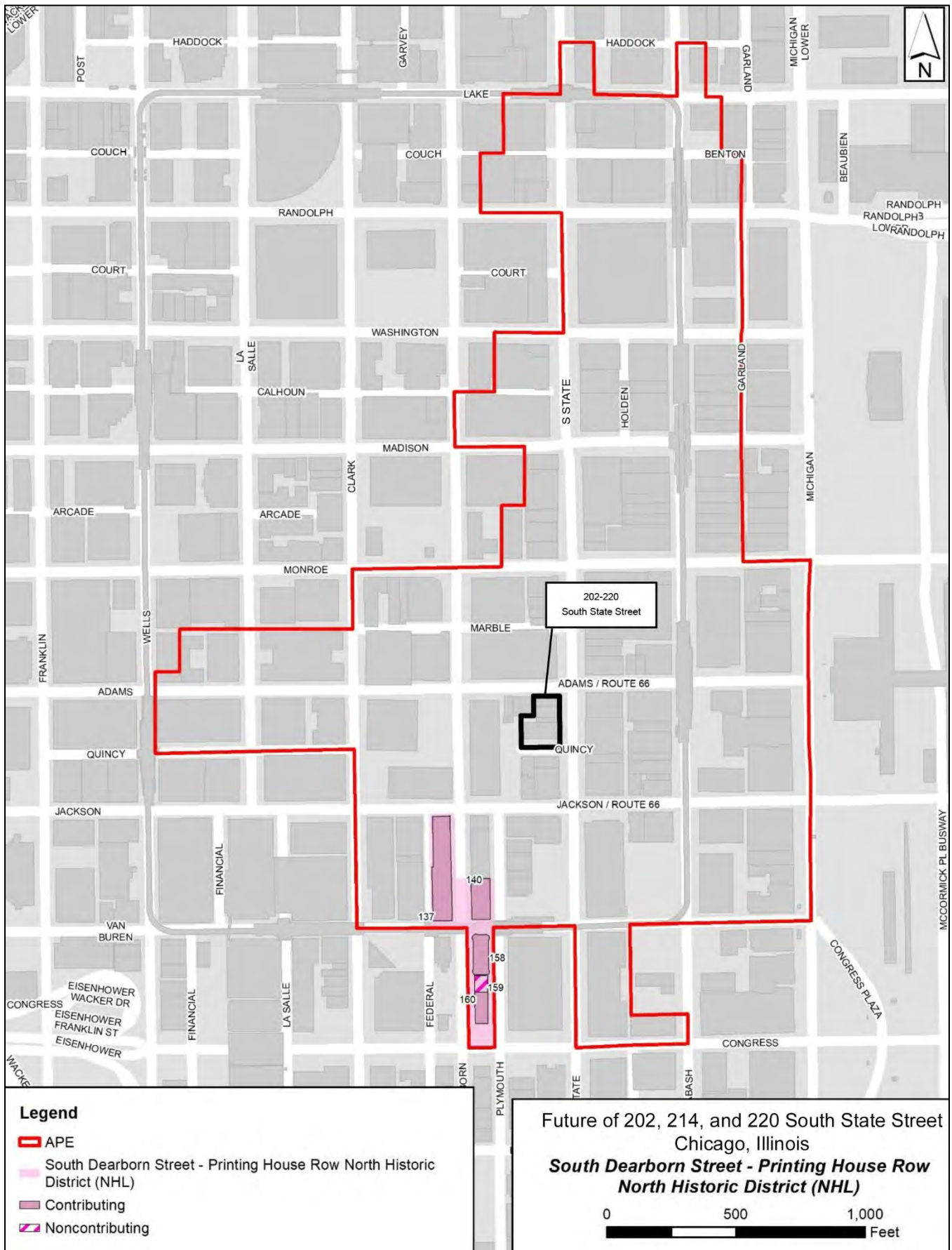
| Map Ref# | Property Name | Location/Address | Building Type/Use | Date(s) of Construction and Architect (if known) | Architectural Style | NRHP Eligibility | Photo | Preliminary Effects Assessment |
|----------|--|--|---------------------------------|--|---------------------|--|---|---|
| 147 | A.M. 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

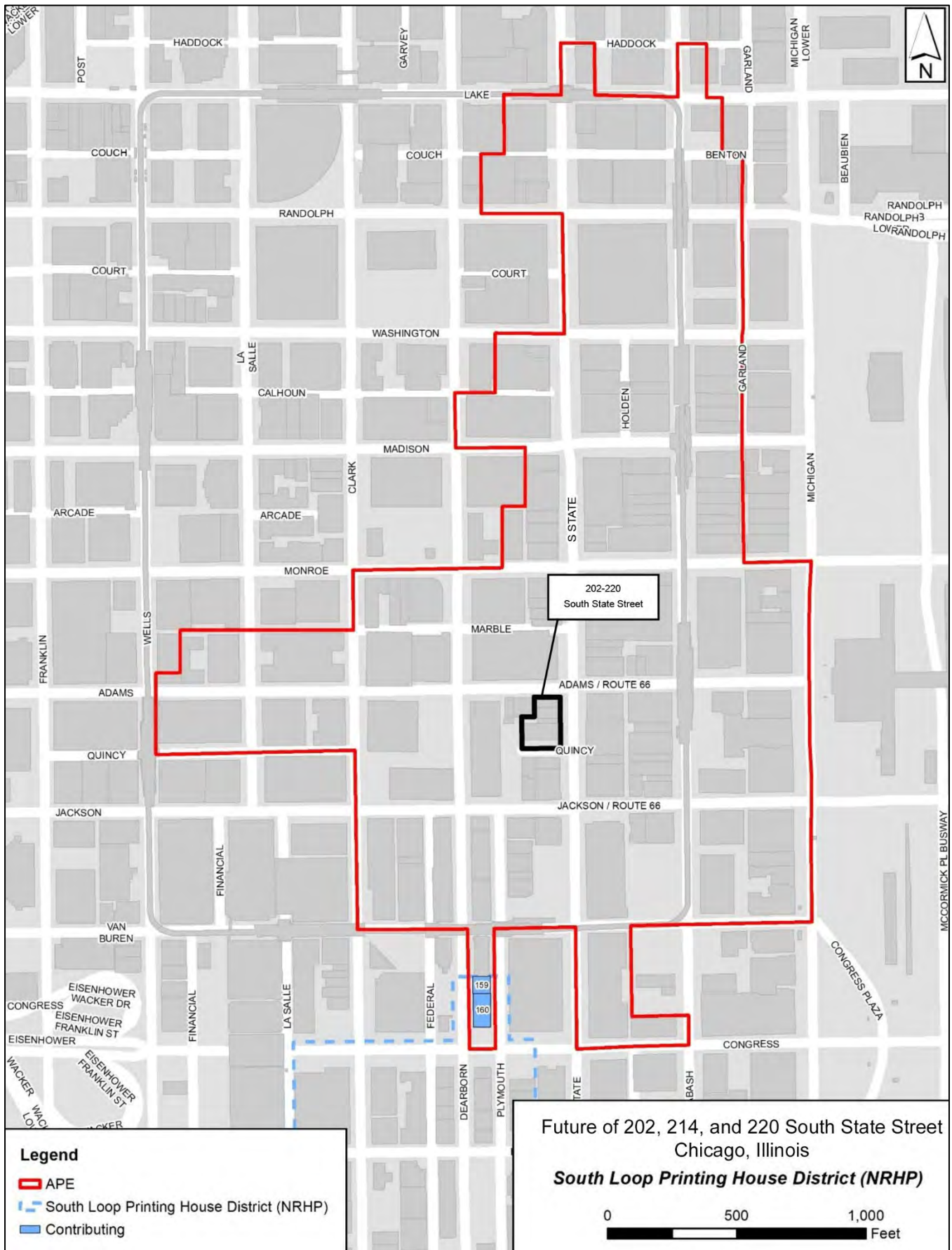
| Map Ref# | Property Name | Location/Address | Building Type/Use | Date(s) of Construction and Architect (if known) | Architectural Style | NRHP Eligibility | Photo | Preliminary Effects Assessment |
|----------|---|---|-------------------|--|---------------------|------------------|---|---|
| 162 | 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

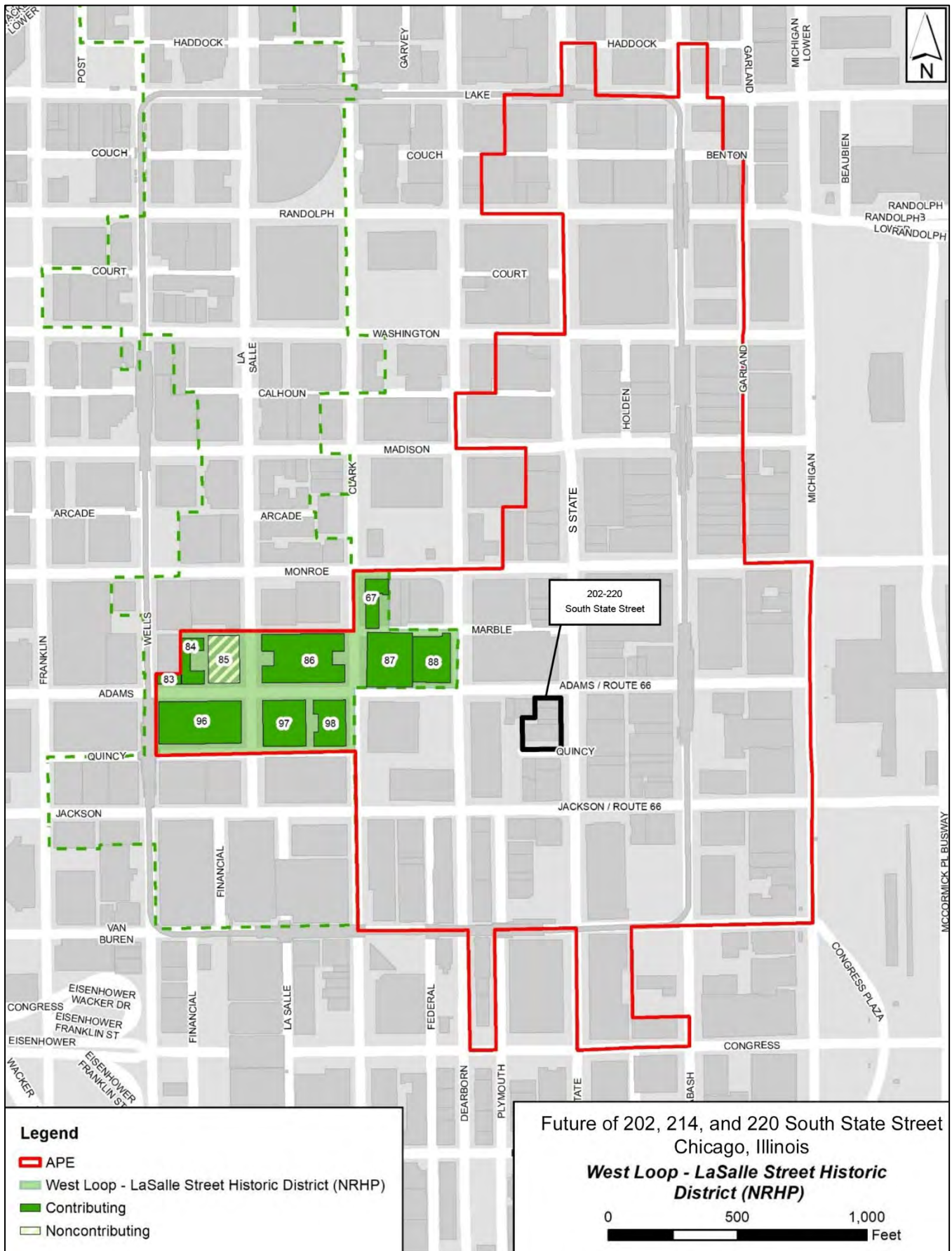
| Map Ref# | Property Name | Location/Address | Building Type/Use | Date(s) of Construction and Architect (if known) | Architectural Style/Details | NRHP Eligibility | Photo | Preliminary Effects Assessment |
|----------|---------------------|-------------------|--|---|-----------------------------|--|---|---|
| 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)











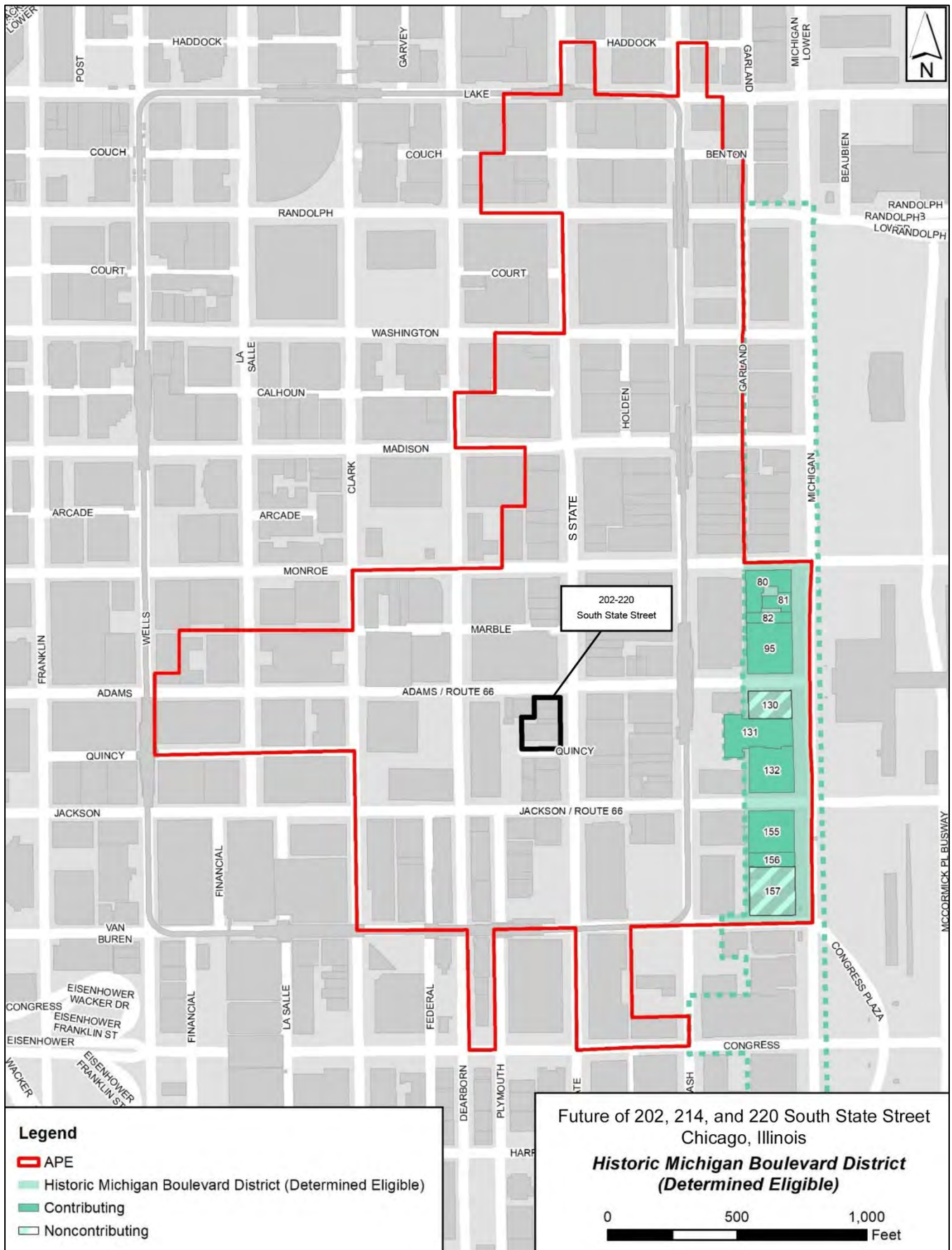
| Map Ref# | Property Name | Location/Address | Building Type/Use | Date(s) of Construction and Architect (if known) | Architectural Style/Details | NRHP Eligibility | Photo | Preliminary Effects Assessment |
|----------|---|------------------------------|--------------------------|--|-----------------------------|----------------------------------|---|---|
| 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)











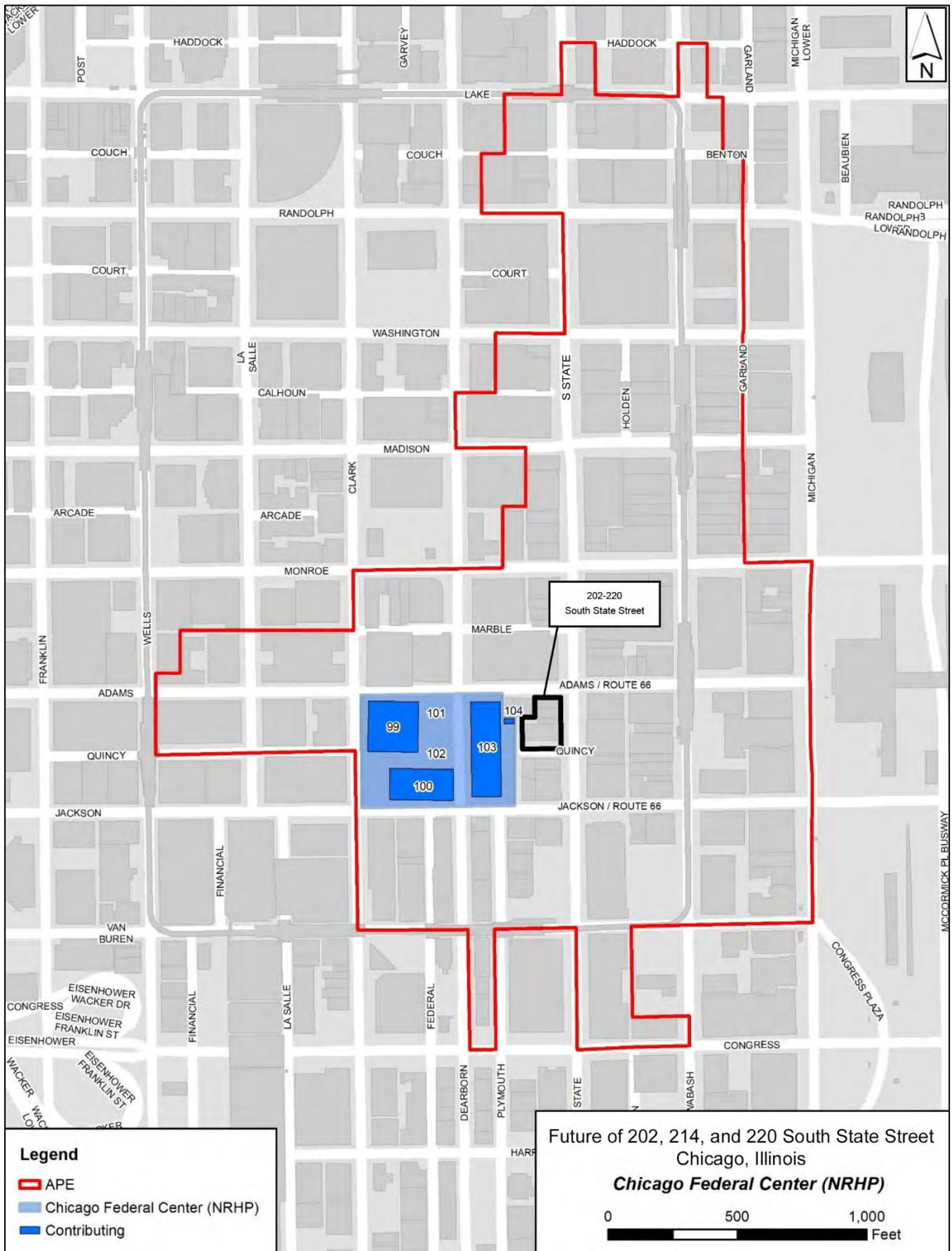
| Map Ref# | Property Name | Location/Address | Building Type/Use | Date(s) of Construction and Architect (if known) | Architectural Style/Details | NRHP Eligibility** | Photo | Preliminary Effects Assessment |
|----------|---|------------------------|----------------------------------|--|------------------------------|---|---|---|
| 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)


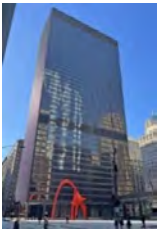




| Map Ref# | Property Name | Location/Address | Building Type/Use | Date(s) of Construction and Architect (if known) | Architectural Style/Details | NRHP Eligibility** | Photo | Preliminary Effects Assessment |
|----------|--|------------------------|---------------------------------------|--|-----------------------------|--|--|---|
| 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 |

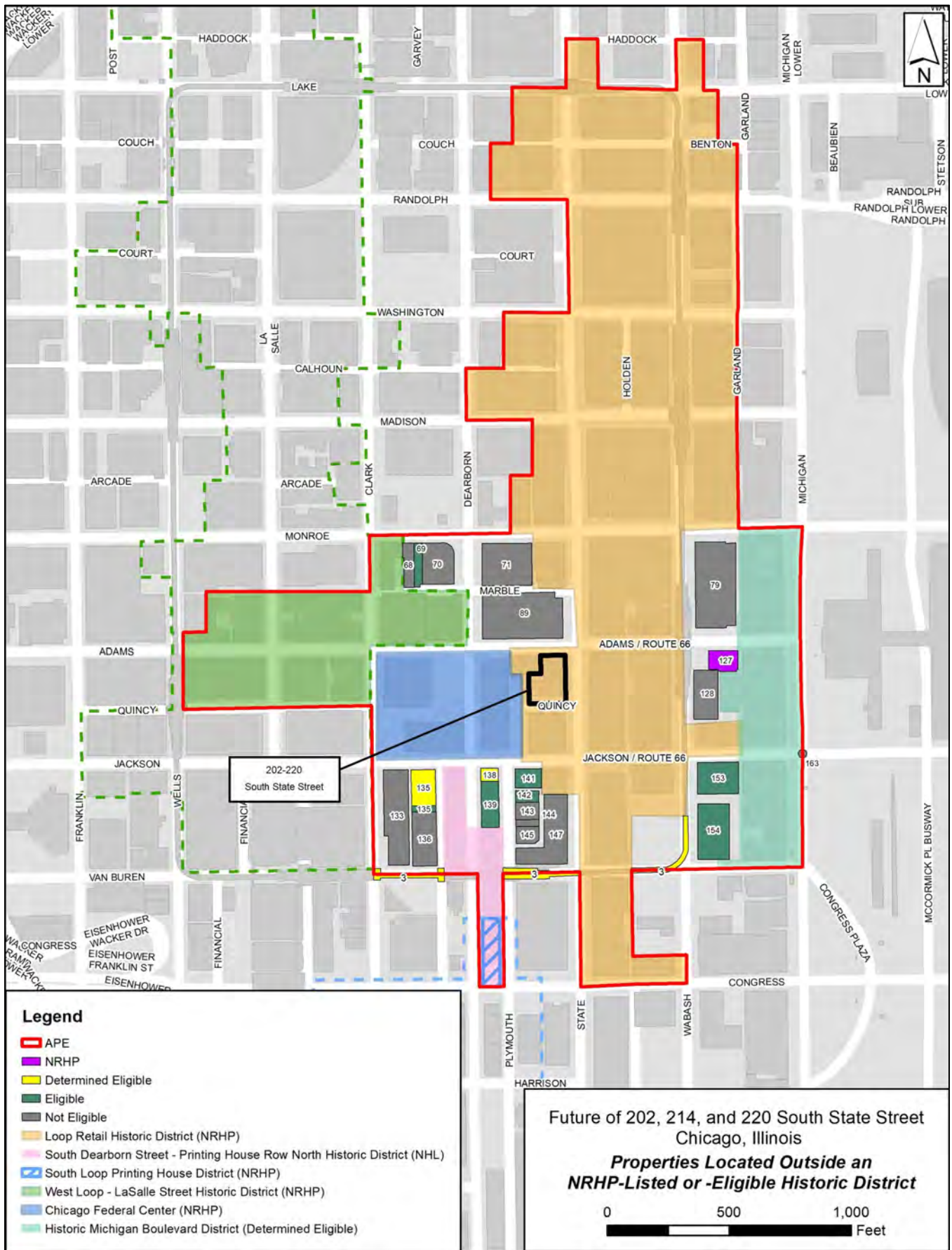
**Contributing and noncontributing resources were not differentiated when the district was determined eligible



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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B5. Programmatic Agreement

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FINAL DRAFT
PROGRAMMATIC AGREEMENT
AMONG
THE UNITED STATES GENERAL SERVICES ADMINISTRATION,
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
AND THE ILLINOIS STATE HISTORIC PRESERVATION
OFFICER
REGARDING
THE FUTURE OF 202, 208-212, 214 and 220 SOUTH STATE STREET
CHICAGO, ILLINOIS

12 **WHEREAS**, on May 4, 2004, the General Services Administration (GSA), pursuant to 40 USC 3307,
13 submitted to the Committee on Environment and Public Works of the United States Senate and the
14 Committee on Transportation and Infrastructure of the United States House of Representatives (the
15 Committees) a prospectus seeking new obligational authority to expend funds to acquire the land and
16 buildings comprising the 200 block of South State Street and the unit block of West Jackson Boulevard
17 (the Prospectus);

18 **WHEREAS**, the Prospectus set forth among the justifications for the acquisition to “allow GSA to create a
19 buffer zone integral to the security of the [Everett McKinley Dirksen] Courthouse,” and further to
20 “increase security by eliminating the possibility of private sector development proximate to the Dirksen
21 Courthouse;”

22 **WHEREAS**, the Prospectus was approved by the House Committee by resolution on July 21, 2004, and
23 the Senate Committee by resolution on November 17, 2004;

24 **WHEREAS**, on various dates in 2005, GSA acquired title to the properties north of Quincy Court that
25 were the subject of the Prospectus, which included 202, 208-212, 214, and 220 South State Street (the
26 State Street Buildings), all of which are presently unoccupied;

27 **WHEREAS**, 202 South State Street was unoccupied at the time of acquisition and the other State Street
28 Buildings were partially occupied at the time of acquisition but fully vacant by June 2014;

29 **WHEREAS**, when GSA acquired the State Street Buildings, the buildings had significant fire
30 protection/life safety deficiencies, substandard mechanical and electrical systems, and exterior
31 envelope deterioration, as documented by GSA in the 2009 Building Preservation Plans for 202 and 220
32 South State Street;

33 **WHEREAS**, these conditions required GSA to vacate all tenants from the buildings and all were fully
34 vacant by June 2014;

35 **WHEREAS**, the multiple system deficiencies of the State Street Buildings at the time of GSA’s acquisition
36 required a level of investment that GSA could not fully address within its authorized funding threshold
37 for repair and alteration projects;

38 **WHEREAS**, throughout its ownership, GSA has made investments to the extent that available funds
39 would allow in maintenance, protection, and stabilization of the buildings, particularly in regard to life
40 safety measures;

41 **WHEREAS**, despite the vacant status of the buildings and lack of federal use, GSA’s Operations and
42 Maintenance contractor performs twice daily (morning and evening) inspections of the State Street

1 Buildings and cleans all roof drains on a semi-annual basis;

2 **WHEREAS**, GSA additionally maintains an annual contract for the rental of scaffolding and canopies
3 around 220 South State Street and a portion of 202 South State Street, owns and maintains a canopy on
4 the remainder of 202 South State Street, contracts to perform facade inspections and repairs on 202
5 and 220 South State Street every two to three years, and funds repairs to the State Street Buildings that
6 are necessary for life safety, security or prevention of damage to the general public and to the
7 neighboring Berghoff property (the Berghoff);

8 **WHEREAS**, the State Street Buildings remain structurally sound, as shown in the Condition Assessment
9 Reports prepared by GSA in 2023, with interior conditions similar to those documented in 2009, while
10 the deteriorated exteriors continue to advance due to lack of funds available to address the systemic
11 repairs required;

12 **WHEREAS**, on December 19, 2006, GSA entered into an agreement with the Berghoff under which, in
13 exchange for fee title to the Berghoff's property unencumbered by the anticipated vacation of Quincy
14 Court, GSA would convey a non-exclusive perpetual easement and right-of-way for pedestrian and
15 vehicular ingress and egress over, along, upon and across the vacated section of Quincy Court to the
16 Berghoff, together with commitments by GSA to assume certain responsibilities of notice, coordination,
17 and protection of the Berghoff building in the event that GSA conducted major construction activities
18 with respect to the State Street Buildings;

19 **WHEREAS**, the City of Chicago (City) approved an ordinance (document number 0716633160) on March
20 14, 2007, vacating that portion of Quincy Court bisecting the 200 Block of South State Street, on the
21 condition that GSA reserve for the Berghoff the right to vehicular access to the rear of its building at 17
22 West Adams Street and adjacent to the State Street Buildings, over the vacated right-of-way;

23 **WHEREAS**, between 2007 and 2015, GSA completed various federal-use redevelopment studies for the
24 State Street Buildings, including adaptive reuse feasibility studies, to meet potential federal space needs
25 projected at the time of acquisition, and GSA engaged in Section 106 consultation with the Illinois State
26 Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), Landmarks
27 Illinois, and Preservation Chicago between 2009 and 2013 during those feasibility investigations for
28 various redevelopment approaches to federal use for the State Street Buildings (see Attachment A for a
29 list, summary, and timeline of previous studies);

30 **WHEREAS**, after developing preliminary concepts for use of the State Street Buildings for federal offices,
31 GSA drafted two prospectus funding requests for fiscal years 2011 and 2012, respectively, for projects
32 based on those concepts;

33 **WHEREAS**, considering the State Street Buildings projects among all other nationwide capital funding
34 requests, GSA chose to prioritize other capital funding needs because the State Street Buildings
35 prospectus requests were not competitive due to GSA's abundant nationwide capital investment needs,
36 leading to GSA not including the State Street Buildings among those for which it requested funding from
37 Congress for those fiscal years;

38 **WHEREAS**, after 2012, it became apparent to GSA that the projected federal space needs upon which
39 the State Street redevelopment project was premised were increasingly unlikely to materialize, and
40 GSA discontinued further consideration of a State Street redevelopment project in the formulation of
41 its budget requests to Congress and suspended Section 106 consultations for this potential federal
42 reuse undertaking in 2013;

43 **WHEREAS**, after 2013, with no projected federal need for space in the State Street Buildings to support

1 GSA’s redevelopment of the properties, GSA explored its options to find private entities with interest in
2 redeveloping the properties as a means for potentially recouping the investment the federal
3 government made to acquire the properties; these efforts culminated in a determination by GSA that
4 the State Street Buildings were excess to GSA’s needs, and a subsequent determination by GSA that the
5 State Street Buildings were surplus to the federal government’s needs;

6 **WHEREAS**, on March 20, 2017, under its authority to dispose of surplus federal property and in
7 compliance with the NHPA, in order to achieve a No Adverse Effect finding, GSA entered into an
8 agreement with the City, in concurrence with the SHPO, under which the State Street Buildings were to
9 be rehabilitated in accordance with the Secretary of the Interior’s Standards for Rehabilitation and
10 preservation deed covenants, subject to restrictions intended to address the security of the Dirksen
11 Courthouse;

12 **WHEREAS**, those restrictions to address Dirksen Courthouse security, initially developed by GSA in
13 collaboration with the U.S. District Court for the Northern District of Illinois and federal law
14 enforcement agencies starting in 2015 as part of the disposal action, formed the beginning of the
15 current 15 viable adaptive reuse security criteria to address security concerns at the Chicago Federal
16 Center (see Attachment B for further information on the viable adaptive reuse security criteria);

17 **WHEREAS**, the opportunity for private redevelopment of the State Street Buildings through a property
18 disposal initiative with the City, which secured a qualified developer for residential conversion through a
19 competitive process and in accordance with GSA’s requirements, was relinquished on September 17,
20 2019, when the City withdrew its offer to purchase the State Street Buildings and its support for any sale
21 or redevelopment that did not satisfy the security concerns of the Federal Courts and United States
22 Department of Justice;

23 **WHEREAS**, the 2022 Consolidated Appropriations Act provided GSA obligational authority to 1) expend
24 \$52 million for demolition of the State Street Buildings; 2) protect the adjacent buildings during the
25 demolition process; 3) secure the vacant site of the demolished buildings; and 4) landscape the vacant
26 site following demolition (Public Law No: 117-103, March 15, 2022);

27 **WHEREAS**, GSA proposes to take action to address the security needs of the Dirksen Courthouse,
28 consistent with its duty to responsibly manage these federal assets (the Undertaking), and GSA will
29 continue to invest in courthouse security in collaboration with the priorities identified by the U.S.
30 Courts and U.S. Marshals Service, subject to feasibility, to the extent GSA is provided funding and
31 authorization by Congress to do so;

32 **WHEREAS**, the above-described Undertaking is subject to Section 106 of the National Historic
33 Preservation Act of 1966, as amended (54 United States Code [USC] § 306108, *et seq.*), and its
34 implementing regulations, “Protection of Historic Properties” (Title 36 *Code of Federal Regulations*
35 [CFR] Part 800);

36 **WHEREAS**, the Section 106 process seeks to accommodate historic preservation concerns with the
37 needs of Federal undertakings through consultation among the agency official and other parties with an
38 interest in the effects of the undertaking on historic properties (36 CFR Part 800.1(a));

39 **WHEREAS**, on October 12, 2022, GSA formally initiated Section 106 consultation with the SHPO;

40 **WHEREAS**, under Section 106, GSA considered both Demolition and Viable Adaptive Reuse to address the
41 future of the State Street Buildings;

42 **WHEREAS**, GSA has conducted its Section 106 consultation process concurrently with, but separate from,

1 its National Environmental Policy Act (NEPA) (42 USC § 4321, et seq.) process, under which GSA is
2 preparing an Environmental Impact Statement;

3 **WHEREAS**, Demolition is defined in the Environmental Impact Statement as complete or partial removal
4 of 202 or 220 South State Street;

5 **WHEREAS**, Viable Adaptive Reuse is defined in the Environmental Impact Statement as GSA retaining
6 ownership of the State Street Buildings and contracting with others to rehabilitate some or all of the
7 buildings in accordance with the 15 viable adaptive reuse security criteria developed to address security
8 concerns at the Chicago Federal Center by GSA in collaboration with the U.S. District Court for the
9 Northern District of Illinois and federal law enforcement agencies (see Attachment B), and in accordance
10 with any subsequent modifications to the criteria;

11 **WHEREAS**, the parties GSA contracts with would be solely responsible for funding the rehabilitation;

12 **WHEREAS**, GSA has identified Viable Adaptive Reuse as the preferred alternative;

13 **WHEREAS**, 40 CFR 1501.10 states that NEPA Environmental Impact Statements shall be issued within 2
14 years from the date of issuance of the notice of intent to the date a record of decision is signed, and the
15 National Historic Preservation Act (NHPA) requires that Federal agencies conclude the Section 106
16 process before approving the expenditure of funds on or issuing approval for an undertaking to proceed
17 (54 USC § 306108);

18 **WHEREAS**, because of this intersection between NEPA and NHPA, the NHPA agreement document to
19 resolve the adverse effects to historic properties must be executed before the NEPA record of decision
20 is signed by GSA, and the agreement document be included in the record of decision to memorialize the
21 commitments made under Section 106;

22 **WHEREAS**, the public has had the opportunity to participate in the Section 106 process through the
23 *Notice of Intent To Prepare an Environmental Impact Statement and Initiate Section 106 Consultation for*
24 *Four Buildings at 202, 208–212, 214 and 220 South State Street, Chicago, Illinois, and Notice of Public*
25 *Scoping, Meetings and Comment Period*, published on November 1, 2022; at the public scoping meeting
26 on November 10, 2022, which included a presentation on the Section 106 process and an explanation
27 that any public comments on historic properties would be considered during both the NEPA and the
28 Section 106 reviews; through the *Notice of Availability - Draft Environmental Impact Statement for the*
29 *Buildings at 202, 214, and 220 South State Street, Chicago, Illinois*, published on September 15, 2023;
30 and at the public meeting on the Draft Environmental Impact Statement on October 2, 2023;

31 **WHEREAS**, on December 16, 2022, GSA provided information on the Undertaking and an invitation to
32 participate in the consultation in accordance with 36 CFR Part 800.6(a)(1)(i)(A) to the ACHP, and the ACHP
33 notified GSA that it would participate in the consultation via a letter dated December 23, 2022, because
34 the Undertaking may have substantial impacts on historic properties and the consultation may raise
35 policy and procedural questions;

36 **WHEREAS**, in accordance with 36 CFR Part 800.6(a)(1)(i)(C), GSA provided the ACHP the required
37 documentation through the Electronic Section 106 Documentation Submittal System on January 24,
38 2023;

39 **WHEREAS**, GSA identified and invited parties to participate in the consultation on December 19, 2022
40 (See Attachment C for list of Consulting Parties);

41 **WHEREAS**, in a letter dated January 5, 2023, GSA initiated Section 106 consultation with the following
42 Native American tribes: Citizen Potawatomi Nation, Oklahoma; Forest County Potawatomi Community;

1 Hannahville Indian Community, Michigan; Kickapoo Tribe of Oklahoma; Little Traverse Bay bands of
2 Odawa Indians, Michigan; Menominee Indian Tribe of Wisconsin; Miami Tribe of Oklahoma; Prairie Band
3 Potawatomi Nation; Ho-Chunk Nation; Peoria Tribe of Indians of Oklahoma; Sac and Fox Nation of
4 Mississippi in Iowa; Sac and Fox Nation of Missouri; and Sac and Fox Nation of Oklahoma;

5 **WHEREAS**, the Forest County Potawatomi Community responded via email on January 17, 2023, and
6 accepted the invitation to be a Consulting party, stated that no historic properties of significance to their
7 community were affected, and noted that in the event an inadvertent discovery at any phase of the
8 project that exposes human remains or archaeologically significant materials, the Tribes must be included
9 in any consultation regarding treatment and disposition;

10 **WHEREAS**, the Miami Tribe of Oklahoma responded on January 23, 2023, and offered no objection to
11 the project, accepted the invitation to be a Consulting party, and requested immediate notification if
12 any human remains or Native American cultural items falling under the Native American Graves
13 Protection and Repatriation Act or any archaeological evidence were discovered during any phase of
14 this project;

15 **WHEREAS**, GSA received no other responses from Native American tribes;

16 **WHEREAS**, GSA established the area of potential effects (APE) as defined at 36 CFR Part 800.16(d), and
17 after revisions made in response to comments received during the consultation process, the SHPO
18 agreed with the APE in a letter dated March 24, 2023 (see Attachment D for APE map);

19 **WHEREAS**, the footprint of the Undertaking is within the Loop Retail Historic District, which is listed in
20 the National Register of Historic Places (NRHP) under Criterion A for its representation of the history of
21 retail shopping, luxury wholesale trade, professional and personal services, and theaters and hotels in
22 Chicago between 1872 and 1949; and under Criterion C for possessing representative examples of all
23 major commercial building types from the period and a diverse range of architectural styles and
24 practitioners, including the largest and finest collection of commercial buildings in Chicago with major
25 works of national and international importance, and the largest grouping of early post-Chicago Fire loft
26 buildings in the Loop, several major department store buildings important in the history of retail
27 development, and influential examples of the Chicago School of architecture;

28 **WHEREAS**, 202 and 220 South State Street are listed in the NRHP as contributing to the Loop Retail
29 Historic District and 208-212 South State Street was not;

30 **WHEREAS**, 214 South State Street would be contributing to the Loop Retail Historic District except for
31 the slipcover that obscures the façade and postdates the district's period of significance, as stated by
32 the SHPO in a letter dated May 24, 2023, and GSA and the SHPO agreed that it is eligible for the NRHP
33 as part of the Loop Retail Historic District;

34 **WHEREAS**, GSA determined that there were other historic properties in the APE (see Attachment D for a
35 map of properties in the APE that are eligible for or listed in the NRHP and Attachment E for a table of
36 those properties);

37 **WHEREAS**, on March 27, 2023, the SHPO concurred with GSA's finding that demolition of 208-212 South
38 State Street would not adversely affect historic properties;

39 **WHEREAS**, GSA demolished 208-212 South State Street in Summer 2023 as a separate emergency
40 undertaking and the site is currently a secured landscaped lot without public access;

41 **WHEREAS**, the *Architectural Resources Survey Report and Assessment of Effects to Historic Properties -*
42 *Future of 202, 214, and 220 South State Street, Chicago, Illinois and the Archaeological Resources*

1 *Review - Future of 202, 214, and 220 South State Street, Chicago, Illinois* were prepared on behalf of GSA
2 and provided to the SHPO and the other Consulting Parties on September 7, 2023, and GSA found that
3 the Undertaking would have an adverse effect on historic properties;

4 **WHEREAS**, GSA determined the Undertaking could have adverse effects to 202, 214, and 220 South State
5 Street; the Loop Retail Historic District as a whole; historic properties adjacent to 202-220 South State
6 Street and contributing to the Loop Retail Historic District; and the Chicago Federal Center;

7 **WHEREAS**, the SHPO concurred with the determinations of NRHP-eligibility and that the Undertaking
8 would have an adverse effect on historic properties on October 16, 2023;

9 **WHEREAS**, in accordance with 36 CFR Part 800.10, *Special requirements for protecting National Historic*
10 *Landmarks*, GSA evaluated the National Historic Landmarks in the APE (see Attachment D for a map of
11 National Historic Landmarks in the APE and Attachment E for a table of those properties) for effects and
12 determined that there would be no adverse effect to National Historic Landmarks from the Undertaking
13 regardless of which alternative was selected, and the SHPO concurred on October 16, 2023;

14 **WHEREAS**, given that implementation of the Viable Adaptive Reuse alternative described above could
15 result in a range of potential outcomes, GSA has prepared this Programmatic Agreement (PA) in
16 compliance with 36 CFR Part 800.14(b)(1)(ii) and 800.14(b)(3) because the effects on historic properties
17 cannot be fully determined prior to approval of the Undertaking;

18 **WHEREAS**, this PA contemplates that some or all of the remaining State Street Buildings would
19 be rehabilitated, and the landscaped lot at 208-212 South State Street could be redeveloped
20 under the Viable Adaptive Reuse alternative;

21 **WHEREAS**, GSA has consulted with the SHPO, the ACHP, and the other Consulting Parties on ways to
22 avoid, minimize, and/or mitigate the adverse effects that the Undertaking could have on historic
23 properties, pursuant to the regulations implementing Section 106 of the NHPA at 36 CFR Part 800;

24 **WHEREAS**, GSA held thirteen Consulting Parties meetings between January 19, 2023, and August 5, 2024,
25 including two charrettes using industry professionals to aid with the goal of identifying and discussing
26 adaptive reuse scenarios for the State Street properties and understanding market interest in their
27 adaptive reuse to help identify ways to avoid or minimize adverse effects to historic properties;

28 **WHEREAS**, GSA and the Consulting Parties consulted on potential mitigation for demolition of 202 and
29 220 South State Street, as captured in the consultation record, and those mitigation measures could be
30 revisited through continued consultation if needed;

31 **WHEREAS**, many Consulting Parties and members of the public have expressed a desire for the
32 preservation of the Century and Consumers Buildings (202 and 220 South State Street, respectively),
33 which have been listed in Preservation Chicago's Chicago 7 Most Endangered in 2011, 2013, 2022, 2023
34 and 2024, as one of the Most Endangered Historic Places in Illinois in 2022 and 2023 by Landmarks
35 Illinois, as one of the 11 Most Endangered Historic Places for 2023 by the National Trust for Historic
36 Preservation, and have been voted unanimously to be designated as Chicago Landmarks by the
37 Commission on Chicago Landmarks in December 2023 and forwarded to the Chicago City Council for
38 consideration in January 2024, and had almost 24,000 signatures on an on-line petition to save them
39 gathered by Preservation Chicago;

40
41 **NOW THEREFORE**, GSA, the SHPO, and ACHP agree that the Undertaking shall be implemented in
42 accordance with the following stipulations in order to take into account the effect of the Undertaking

1 on historic properties.

3 STIPULATIONS

4 GSA shall ensure that the following measures are carried out, subject to the limitations of the Anti-
5 Deficiency Act as set forth in Stipulation XII.:

6 I. DEFINITIONS

- 7 **A.** “Consulting Parties” are those that have consultative roles in the Section 106
8 process, including Signatories, Invited Signatories, and Concurring Parties (36 C.F.R.
9 § 800.2(c)).
- 10 **B.** “Signatories” as defined in 36 CFR Part 800.6(c)(1) have the sole authority to
11 execute, amend, or terminate this agreement, and “Invited Signatories” as defined
12 in 36 CFR Part 800.6(c)(2) have the same rights with regard to seeking amendment
13 or termination of this agreement as the Signatories. The Signatories are GSA, the
14 ACHP, and the SHPO.
- 15 **C.** Any reference within this PA to a “Signatory” includes Signatories and Invited Signatories.
- 16 **D.** Concurring Parties are those Consulting Parties that are asked to concur with this
17 PA, indicating a willingness to participate in future consultations if needed, but
18 cannot prevent the PA from being executed, amended, or terminated.

20 II. AVOIDANCE AND MINIMIZATION MEASURES

- 21 **A. Maintenance and Security.** Before rehabilitations of the 202-220 South State Street
22 buildings begin, GSA will ensure that any lessee(s) continue a program of cyclical
23 inspection and maintenance to preserve the structural integrity and historic fabric of the
24 building(s) and, to the extent feasible, make any necessary repairs or replacements in
25 cooperation with GSA and in consultation with SHPO. The lessee(s) will ensure the
26 buildings remain secured from unlawful entry before and during rehabilitation.
- 27 **B. Future Maintenance.** GSA will ensure that any lessee(s) maintains and repairs the
28 character-defining features of the buildings that are rehabilitated for the duration of the
29 lease period in accordance with the recommended approaches in the Secretary’s
30 Standards and with the leasing documents.

32 III. MITIGATION MEASURES

33 The following Stipulations address adverse effects to historic properties associated with the Viable
34 Adaptive Reuse alternative.

35 Measures listed in Stipulation III. are broad commitments that GSA will adhere to. Prior to viable
36 adaptive reuse construction, GSA will, in consultation with the Consulting Parties, develop detailed
37 measures for the mitigation commitments to resolve adverse effects on historic properties that may
38 result from the Viable Adaptive Reuse of the State Street Buildings. Preliminary details of the mitigation
39 measures are contained in Attachment F. GSA will work with the Consulting Parties to develop detailed
40 actions, steps, timelines, and other information to implement the mitigation commitments in the PA
41 and will document those details in Attachment F. Attachment F may be revised or updated without

1 amendment of this PA, as long as all Signatories agree in writing to the proposed changes. Signatories
2 will provide such agreement via electronic mail to GSA. If any Signatory disagrees in writing with
3 proposed changes to Attachment F, GSA will consult with all Signatories to resolve the objection. If GSA
4 cannot resolve the objection, the disagreement will be resolved as stated in Stipulation VII. Upon receipt
5 of Signatories' agreement to any revisions and updates to Attachment F, GSA will provide those
6 revisions and updates to the Consulting Parties.

7 These stipulations apply to adaptive reuse of all or any of the buildings at 202, 214, or 220 South State
8 Street including rehabilitation of some or all of the remaining State Street Buildings, possible demolition
9 of 214 South State Street, partial demolition of 202 or 220 South State Street, or redevelopment of the
10 landscaped lot at 208-212 South State Street. Any outlease agreement GSA signs for these buildings will
11 include this PA as an attachment to ensure the lessee(s) adhere to their responsibilities.

12 **A. Rehabilitation of One or More of the State Street Buildings.** Rehabilitations to facilitate
13 viable adaptive reuse of one or more of the buildings at 202-220 South State Street will
14 be subject to GSA approval and oversight, including compliance with Section 106 of the
15 NHPA, and will follow the Secretary of the Interior's Rehabilitation Standards and
16 Guidelines, to the extent possible, as it relates to the operational needs of the program
17 for reuse or to the financial needs of the offeror's proforma.

18 **B. Reuse of 214 South State Street Storefront.** If viable adaptive reuse requires the
19 demolition of 214 South State Street for new construction on the site, then the historic
20 elements on the first floor, including the storefront, interior, and stairway, will be re-used
21 and incorporated into the project. The selection of historic elements and the re-use
22 design will be done in cooperation with GSA and in consultation with SHPO.

23 **C. Reuse of Previously Salvaged Historic Architectural Components.** Project design for
24 rehabilitation of 202 and 220 South State Street will include reuse of previously salvaged
25 and stored historic architectural components from these buildings, including salvaged
26 terra cotta parapet cladding, decorative horizontal portions of the fire escape, and the
27 original 50-foot flagpole.

28 **D. Redevelopment of 208-212 South State Street or Other New Construction.** Any
29 redevelopment of the landscaped lot at 208-212 South State Street or other new
30 construction at 202-220 South State Street will be subject to GSA approval and oversight.
31 The design will be done in cooperation with GSA and in consultation with SHPO, NPS, and
32 other Consulting Parties.

33 **E. Rehabilitation of Quincy Court.** GSA will develop a conceptual plan to rehabilitate Quincy
34 Court to complement the Federal Center and enhance the reuse of the State Street
35 Buildings.

36 **IV. UNANTICIPATED EFFECTS AND POST-AGREEMENT DISCOVERIES**

37 **A.** In the event previously unrecorded properties are discovered during implementation
38 of the Undertaking, or previously identified historic properties are affected in an unanticipated
39 manner, GSA will adhere to the following procedures in accordance with 36 CFR Part 800.13:

- 40 1. Immediately cease, or cause to stop, any activities within 100 feet of the
41 suspected discovery or effect and consult with the SHPO and, if necessary, Tribal
42 Historic Preservation Officers (THPOs) to determine if additional investigation or actions

1 are warranted. GSA will notify the SHPO and, if necessary, THPOs by telephone or via
2 email within twenty-four (24) hours of the discovery of the property or effect.

3 2. The SHPO/THPOs will respond to the notification within two (2) business days.

4 a) If GSA and the SHPO/THPOs determine that further investigation of
5 the discovery or further actions to address the effect are not necessary,
6 activities may resume with no further action required.

7 b) If GSA and the SHPO/THPOs agree that further investigations are
8 warranted, GSA will ensure that a treatment plan is prepared and sent to
9 the SHPO/THPOs.

10 c) If GSA and the SHPO/THPOs agree on the adequacy of the treatment
11 plan within fourteen (14) days of the SHPO/THPO's receipt of the plan, or if
12 the SHPO/THPOs fails to respond with comments within fourteen (14) days of
13 their receipt of the plan, GSA will ensure the treatment plan is implemented
14 as presented.

15 d) If archaeological data recovery is the agreed upon treatment for
16 responding to a post-agreement discovery, GSA will prepare a data recovery
17 plan in consultation with the SHPO/THPOs.

18 e) Any disagreements between GSA and the SHPO/THPOs concerning
19 the need for further investigations or the scope of effort will be addressed in
20 accordance with Stipulation VII. of this PA.

21 **B.** If human remains are encountered during implementation of the Undertaking, GSA will
22 ensure that work within 100 feet of the remains ceases and will secure the site. GSA will contact
23 the Principal Archaeologist at the Illinois SHPO immediately upon discovery as well as the
24 THPOs. GSA will notify all Signatories to this PA within twenty-four (24) hours of the discovery.

25 **V. RESPONSE TO EMERGENCY**

26 **A.** In the event GSA proposes an emergency undertaking as an essential and immediate
27 response to a disaster or emergency declared by the President or the Governor of Illinois,
28 or in response to another immediate threat to life or property, GSA will notify the SHPO
29 and ACHP via telephone and email within two business days of commencing the emergency
30 undertaking.

31 **B.** GSA will include a summary of all emergency undertakings in the status report required
32 in Stipulation VI.

33 **C.** This Stipulation applies only to undertakings that are implemented within 30 calendar
34 days after the disaster or emergency has been formally declared by the appropriate
35 authority. GSA may request an extension of the period of applicability from the ACHP
36 prior to the expiration of the 30 calendar days.

37 **D.** Immediate rescue and salvage operations conducted to preserve life or property are
38 exempt from the provisions of Section 106 and this PA.

39 **VI. REPORTING**

- 1 **A.** The Signatories may request meetings or conference calls regarding the Undertaking
2 and/or implementation of the Stipulations in this PA at any time for the duration of this PA.
3 If unforeseen issues arise regarding the Stipulations or their implementation, the
4 Signatories will inform the other Consulting Parties and may request a Consulting Parties
5 meeting.
- 6 **B.** To keep the Consulting Parties apprised of the status of the implementation of the
7 Stipulations in this PA, GSA will prepare an annual report, commencing one year after this
8 PA is executed, and distribute it to the Consulting Parties via email.
- 9 **C.** Once all Stipulations have been met, GSA will prepare and distribute a final report,
10 documenting the completion. After GSA releases the final report, reporting under this
11 Stipulation will cease.

12 **VII. DISPUTE RESOLUTION**

13 **A.** Signatories

14 All Signatories to this PA will strive to address and resolve disagreements concerning the
15 implementation of this PA without initiating formal dispute resolution. If such resolution
16 cannot be reached:

- 17 1. Any Signatory to this PA may object in writing to GSA regarding any action
18 carried out or proposed with respect to implementation of this PA. GSA will, within
19 ten (10) working days, initiate consultation with the objecting party to resolve the
20 objection.
- 21 2. If after initiating such consultation GSA determines that the objection cannot
22 be resolved through consultation, GSA will:
- 23 a) Forward all documentation relevant to the objection to the ACHP,
24 including GSA's proposed response to the objection. The ACHP shall
25 provide GSA with its advice on the resolution of the objection within thirty
26 (30) days of receiving adequate documentation. Prior to reaching a final
27 decision on the dispute, GSA shall prepare a written response that takes
28 into account any timely advice or comments regarding the dispute from
29 the ACHP, Signatories and Concurring Parties, and provide them with a
30 copy of this written response. GSA will then proceed according to its final
31 decision.
- 32 b) If the ACHP does not provide its advice regarding the dispute within the
33 thirty (30) day period, GSA may make a final decision on the dispute and
34 proceed accordingly. Prior to reaching such a final decision, GSA shall prepare a
35 written response that takes into account any timely comments regarding the
36 dispute from the Signatories and Concurring Parties, and provide them and the
37 ACHP with a copy of such written response.
- 38 c) GSA's responsibility to ensure that all other actions under this PA that
39 are not the subjects of the dispute are carried out will remain unchanged.
- 40 3. Unless all Signatories agree that the dispute warrants a cessation of work,
41 neither GSA nor its collaborator(s) will be required to cease work on the
42 Undertaking while the dispute is being reviewed.

43 **B.** Continued Participation by the Public and Concurring Parties

1 Should a Concurring Party to this PA or any member of the public object in writing to GSA
2 regarding any plans, specifications, or actions provided for review pursuant to this PA
3 within the specified timeframes, GSA will consult with the objecting party and the SHPO to
4 determine how the objection should be resolved and to seek resolution.

- 5 1. Following such consultation, GSA will provide the objecting Concurring Party or
6 member of the public with a decision on the objection.
- 7 2. If GSA and the SHPO are unable to resolve the objection, they will consult with the
8 ACHP. GSA will consider any recommendation on the objection provided by the ACHP
9 before making a final decision on the matter. GSA will communicate such a final
10 decision to the SHPO and to the objecting Concurring Party or member of the public.

11 **VIII. PROFESSIONAL QUALIFICATIONS**

12 All work carried out pursuant to this PA will be developed and/or implemented by or under the direct
13 supervision of a person or persons meeting or exceeding the minimum professional qualifications,
14 appropriate to the affected resource(s), listed in the *Secretary of the Interior's Professional Qualification*
15 *Standards* (36 CFR Part 61, Appendix A).

16 **IX. ELECTRONIC COPIES**

17 GSA will provide the SHPO, ACHP, and each Consulting Party with one legible, full-color, electronic copy
18 of the fully executed PA and its Attachments no more than 30 days after execution. If the electronic
19 copy is too large to send via email, GSA will provide each Consulting Party with a copy of the executed
20 PA via a CD, or in any reasonable medium available.

21 **X. AMENDMENT**

22 Any Signatory may request that this PA be amended by informing GSA in writing of the reason for the
23 request and the proposed amendment language. After receiving the request, GSA will notify all
24 Consulting Parties of the proposed amendment and consult to reach agreement. The amendment will
25 be effective on the date a copy signed by all the Signatories is filed by GSA with the ACHP.

26 **XI. EXPIRATION**

27 This PA will expire ten years from the Effective Date of this PA as defined in Stipulation XIV., herein.
28 Prior to such expiration date, GSA may consult with the SHPO and ACHP to reconsider the terms of this
29 PA and amend or extend it in accordance with Stipulation X. GSA may consult with the SHPO and ACHP
30 regarding the progress of implementation of this PA and consider developing a secondary memorandum
31 of agreement.

32 **XII. COMPLIANCE WITH APPLICABLE LAW AND ANTI-DEFICIENCY ACT PROVISION**

33 This PA will be carried out consistent with all applicable federal and state laws. No provision of this PA
34 will be implemented in a manner that would violate the Anti-Deficiency Act. GSA will make reasonable
35 and good faith efforts to secure the necessary funds to implement this PA in its entirety. All obligations
36 on the part of GSA will be subject to the availability and allocation of appropriated funds for such
37 purposes. Nothing in this PA may be construed to obligate GSA to any current or future expenditure of
38 resources in advance of the availability of appropriations. Should GSA be unable to fulfill the terms of
39 this PA due to funding constraints or priorities, GSA will immediately notify and consult with the SHPO
40 and ACHP to determine whether to amend or terminate this PA pending the availability of resources.
41 This PA shall not be interpreted to impose upon GSA any affirmative obligation to take action

1 necessitating the obligation of appropriated funds. All commitments specified in this PA must therefore
2 be understood as identifying those acts by GSA that, if taken, the Consulting Parties stipulate are
3 sufficient for GSA to have discharged its obligations under Section 106 of the National Historic
4 Preservation Act.

5 **XIII. TERMINATION**

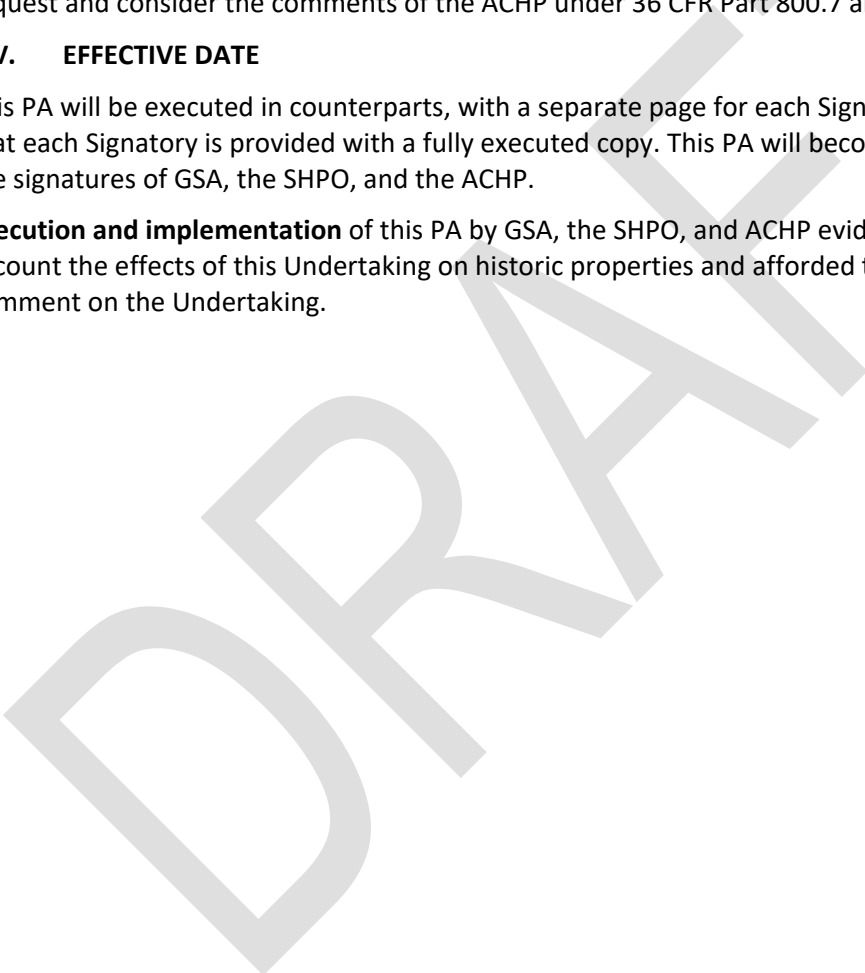
6 If any Signatory to this PA determines that the terms of this PA will not or cannot be carried out, that
7 Signatory will immediately consult with the other Signatories to develop an amendment to this PA
8 pursuant to Section VIII., above. If this PA is not amended following that consultation, then it may be
9 terminated by any Signatory through written notice to the other Signatories. Within 30 days following
10 any such termination and prior to work continuing on the Undertaking, GSA will notify the SHPO and
11 ACHP whether it will initiate consultation to execute a new PA under 36 CFR Part 800.14(b)(1)(ii) or
12 request and consider the comments of the ACHP under 36 CFR Part 800.7 and proceed accordingly.

13 **XIV. EFFECTIVE DATE**

14 This PA will be executed in counterparts, with a separate page for each Signatory, and GSA will ensure
15 that each Signatory is provided with a fully executed copy. This PA will become effective upon obtaining
16 the signatures of GSA, the SHPO, and the ACHP.

17 **Execution and implementation** of this PA by GSA, the SHPO, and ACHP evidence that GSA has taken into
18 account the effects of this Undertaking on historic properties and afforded the ACHP an opportunity to
19 comment on the Undertaking.

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**Attachment A
Previous Studies**

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2 Between 2007 and 2015, GSA analyzed and completed various federal redevelopment scenario studies
3 for 202-220 South State Street, including adaptive reuse feasibility studies. These studies are
4 summarized here.

5 - *Chicago Federal Campus Expansion Plan: Utilization of North Half of Site, 2007*

6 This 2007 study identified four preliminary development alternatives, which considered various
7 combinations of demolition and renovation.

8 - *Chicago Federal Campus Expansion Plan: New Construction North Site Feasibility Study, June
9 2, 2008*

10 This study assessed the feasibility of demolishing 202, 208-212, 214, and 220 South State Street
11 and constructing a new building on the site. The preferred alternative presented in this study combined
12 a centrally located core within the new building and a site strategy using below grade access.
13 Subsequent studies focused on the feasibility of adaptive reuse rather than demolition and new
14 construction.

15 - *Chicago Federal Campus Expansion Plan: Adaptive Reuse North Site Feasibility Study,
16 June 2, 2008*

17 The preferred alternative of this 2008 study was to renovate 202 and 220 South State Street and
18 remove and replace 208-212 and 214 South State Street with a new infill building that would link to 202
19 and 220 South State Street. This study analyzed the feasibility of this alternative and documented a
20 physical plan of action to implement the project, which included a budget to enable government
21 decision makers to determine the viability of the proposed approach. The preferred alternative in this
22 study was not carried forward because it lacked the potential to maximize the marketability of the
23 redeveloped space compared to other approaches.

24 - *Chicago Federal Campus Expansion Plan: Historical Preservation and Increased Marketability
25 North Site Feasibility Study, February 20, 2009*

26 This 2009 study focused on maintaining the historic significance of the buildings, while seeking
27 the maximum potential floorspace for increased marketability. Of the six alternatives discussed in this
28 study, the preferred alternative was restoring only one of the terracotta clad buildings, 202 South State
29 Street, and demolishing the remaining three buildings at 208-212, 214, and 220 South State Street to
30 make way for a new building that would connect to the existing building at 202 South State Street. This
31 strategy aimed to preserve the more historically valuable high-rise (202 South State Street), while
32 maximizing the marketability of the project.

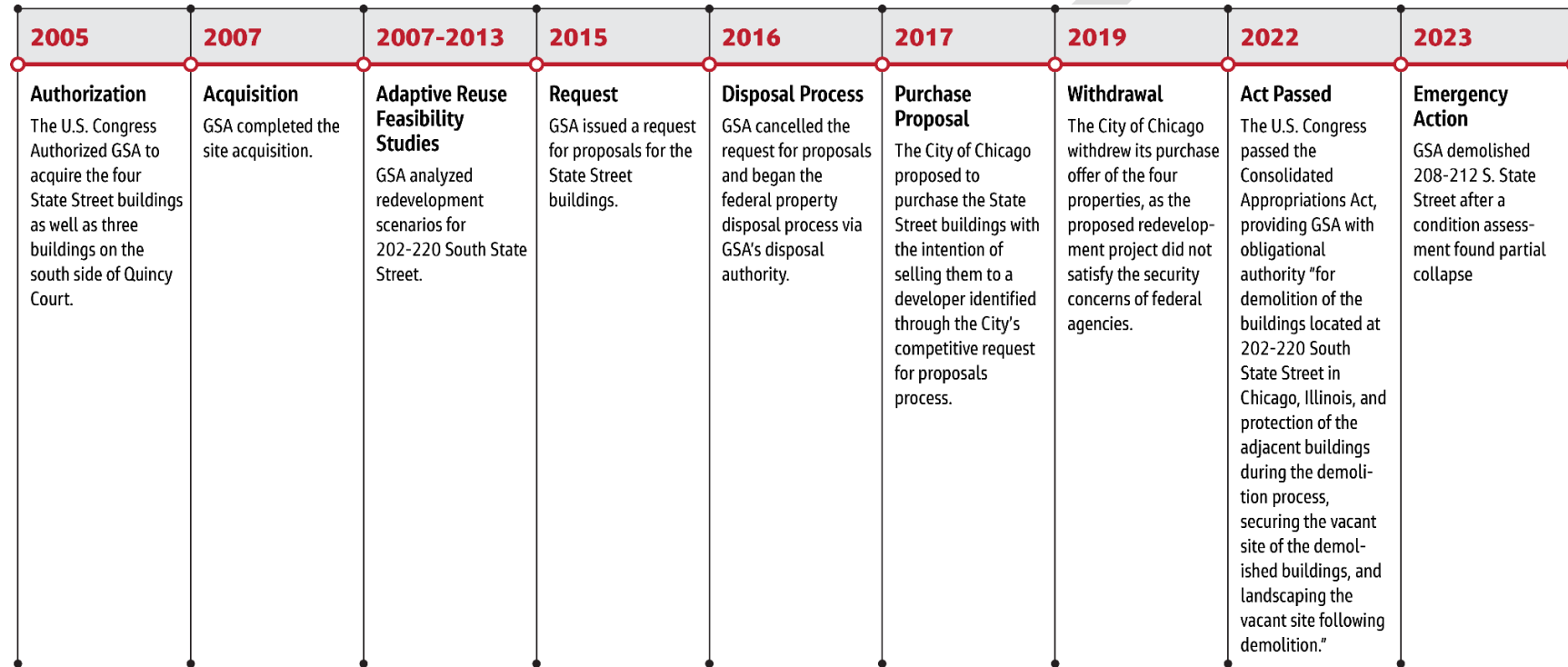
33 - *Chicago Federal Campus Expansion Plan: Assessing Risks North Site Feasibility Study,
34 March 6, 2013*

35 This 2013 study shifted from the earlier perspective of historic preservation and increased
36 marketability to examining construction risks involved in developing the project site. Based on the
37 findings of this study, GSA proposed using the existing buildings' footprint and the adjacent area
38 between the Dirksen Courthouse and Quincy Court for additional floor area.

1 - *Chicago Federal Campus Expansion Plan: Historical Preservation Study North Site Feasibility*
2 *Study, March 6, 2013*

3 This 2013 study supplemented the *Assessing Risks* study and focused on the historic
4 preservation objectives from the 2008 *Adaptive Reuse* and 2009 *Historic Preservation and Increased*
5 *Marketability* studies. Historic preservation workshops were held in June and September 2010 to engage
6 Chicago's historic preservation community in examining viable design alternatives for the site. The
7 ACHP, Illinois SHPO, City of Chicago Landmarks Division, National Trust for Historic Preservation, and
8 Landmarks Illinois participated in the workshops. From the workshops, GSA learned that the historic
9 preservation community preferred renovating 220 South State Street as an option, although it may not
10 align with building standards for GSA buildings, local and national codes, Design Excellence, Art in
11 Architecture, Leadership in Energy and Environmental Design certification, or the Secretary of the
12 Interior's Standards for the Treatment of Historic Properties. Therefore, GSA's perspective shifted
13 toward assessing construction risk in the 2013 *Assessing Risks* study. The workshops also led to
14 reconsideration of the preferred alternative from the 2009 *Historic Preservation and Increased*
15 *Marketability* study (keeping 202 South State Street). This study did not identify a preferred alternative.

Recent Site History



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Attachment B
Viable Adaptive Reuse Security Criteria

1 The 15 viable adaptive reuse security criteria were developed by GSA in collaboration with the U.S.
2 District Court for the Northern District of Illinois and federal law enforcement agencies beginning in 2015,
3 after the State Street buildings were determined surplus. In 2017, additional criteria were added as part
4 of the federal disposal process. The final list of 15 criteria was completed in 2022. The criteria were made
5 available to the public on November 1, 2022, through a notice in the Federal Register entitled “Notice of
6 Intent to Prepare an Environmental Impact Statement and Initiate Section 106 Consultation for Four
7 Buildings at 202, 208-212, 214 and 220 South State Street, Chicago, Illinois, and Notice of Public Scoping
8 Meetings and Comment Period” (Notice-PBS-2022-06; Docket No. 2022-0002; Sequence No. 26) and
9 again on September 15, 2023, through the Notice of Availability for the “Draft Environmental Impact
10 Statement for the Buildings at 202, 214, and 220 South State Street, Chicago, Illinois” (Document 88 FR
11 63576).

12 The 15 viable adaptive reuse security criteria are as follows:

- 13
- 14 ● The federal government must retain ownership interests to achieve its security objectives.
- 15 ● Occupancy/Use: Properties shall not be used for short-term or long-term residential or
16 lodging, places of worship, or medical treatment, services, or research. No use that requires
17 access to outdoor areas is permitted.
- 18 ● Access to the roof is restricted to maintenance and repair activities. Personnel and materials
19 that will be present in this area shall be subject to clearance and controls necessary to meet
20 court security objectives.
- 21 ● Developer would have no access or use rights to Quincy Court.
- 22 ● Loading is prohibited in Quincy Court and otherwise restricted in a manner to achieve court
23 security. Loading on State or Adams Streets would be subject to local ordinance
24 requirements.
- 25 ● Occupants and users of the buildings shall have no sight lines into the Dirksen Courthouse,
26 the Dirksen Courthouse ramp, or the Quincy Court properties owned by GSA.
- 27 ● No parking or vehicle access is permitted on or within the properties.
- 28 ● Developer is responsible for staffing, at their expense, security 24 hours with personnel
29 approved by the Federal Protective Service or an entity to whom security services are
30 delegated by Federal Protective Service.
- 31 ● Developer must obtain and maintain access control systems to prevent unauthorized access to
32 any location within the structures. Each exterior entrance point must have an intrusion
33 detection system and access control system installed, and Developer must provide federal law
34 enforcement access to each system.
- 35 ● Developer must install and maintain interior and exterior security cameras and provide
36 federal law enforcement officials with access and the ability to monitor the feeds in real time.
- 37 ● Developer must install exterior lighting necessary to achieve security objectives of the

1 Dirksen Courthouse.

- 2 ● Perimeter Security: Developer must prevent unauthorized access to the properties that
3 would result in an unapproved sight line.
- 4 ● Fire escapes, and any other structures that would allow access from the street, must
5 be removed.
- 6 ● All construction documents and specifications for any renovation, rehabilitation, modification,
7 or construction of any portion of the building (interior or exterior) will be subject to review and
8 approval by federal law enforcement agencies.
- 9 ● No project may start without the advance approval of GSA.

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**Attachment C
List of Consulting Parties**

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**Attachment D
Area of Potential Effects Maps
with Historic Properties
including National Historic Landmarks**

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Attachment E
Table of Historic Properties
including National Historic Landmarks

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**Attachment F
Mitigation Measures**

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2 As stated in Stipulation III., prior to viable adaptive reuse construction, GSA, in consultation with
3 the Consulting Parties, will develop additional detailed plans for the mitigation measures
4 outlined in the body of the PA to resolve adverse effects on historic properties that may result
5 from the Undertaking. Those measures, detailed below, may be revised or updated without
6 amendment of the PA, as long as all Signatories agree to the proposed changes. Such agreement
7 will be provided by the Signatories via electronic mail to GSA. Upon receipt of Signatories'
8 agreement to any revisions and updates to this Attachment, GSA will provide those revisions and
9 updates to the Consulting Parties.

- 10 A. **Rehabilitation of One or More of the State Street Buildings.** Rehabilitations to
11 facilitate viable adaptive reuse of one or more of the buildings at 202-220 South
12 State Street will be subject to GSA approval and oversight, including compliance
13 with Section 106 of the NHPA, and will follow the Secretary of the Interior's
14 Rehabilitation Standards and Guidelines, to the extent possible, as it relates to the
15 operational needs of the program for reuse or to the financial needs of the
16 offeror's proforma.
- 17 B. **Reuse 214 South State Street Storefront.** If viable adaptive reuse requires the
18 demolition of 214 South State Street for new construction on the site, then GSA will
19 consult with the SHPO on selecting historic elements of the first floor, including the
20 storefront, interior, and stairway, to be salvaged for re-use and incorporation into the
21 project. The re-use design will be done in cooperation with GSA and in consultation
22 with SHPO.
- 23 C. **Re-Install Parapet on 202 South State Street.** In 2023 the historic decorative terra cotta
24 cladding on the parapet of 202 South State Street was documented, disassembled, and
25 stored for future restoration. Rehabilitation of 202 South State Street for adaptive reuse
26 will include re-installation of the salvaged terra cotta parapet cladding to match the
27 historic appearance.
- 28 D. **Reuse 202 South State Street Fire Escape.** The decorative horizontal portions of the
29 fire escape on 202 South State Street, which are a character-defining feature, were
30 salvaged, crated, and stored in 2023 for documentation and future reuse.
31 Rehabilitation of 202 South State Street for adaptive reuse will include incorporating
32 these decorative portions of the fire escape into the project design.
- 33 E. **Reuse 220 South State Street Flagpole.** The original 50-foot flagpole atop 220 South
34 State Street was removed and disassembled in 2021. The sections were subsequently
35 stored in a nearby, secured facility owned by GSA. Rehabilitation of 220 South State
36 Street for adaptive reuse will include repairing, restoring, reassembling and remounting
37 the flagpole in its original location.
- 38 F. **Redevelopment of 208-212 South State Street or Other New Construction.** Any
39 redevelopment of the landscaped lot at 208-212 South State Street or other new
40 construction at 202-220 South State Street will be subject to GSA approval and oversight.
41 The design will be done in cooperation with GSA and in consultation with SHPO, NPS, and
42 other Consulting Parties.
- 43 G. **Rehabilitation of Quincy Court.** GSA, in consultation with SHPO and other Consulting

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Parties, will develop a conceptual plan to rehabilitate Quincy Court to complement the Federal Center and enhance the reuse of the State Street Buildings.

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SIGNATORY PAGE

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PROGRAMMATIC AGREEMENT
AMONG**

**THE UNITED STATES GENERAL SERVICES ADMINISTRATION,
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
AND THE ILLINOIS STATE HISTORIC PRESERVATION
OFFICER REGARDING
THE FUTURE OF 202-220 SOUTH STATE STREET
CHICAGO, ILLINOIS**

Signatory:

General Services Administration

Date _____

Beth L. Savage, Federal Preservation Officer and Director, Center for Historic Buildings

Date _____

Robert Green, Acting Regional Commissioner, Public Buildings Service

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SIGNATORY PAGE

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AND THE ILLINOIS STATE HISTORIC PRESERVATION
OFFICER REGARDING
THE FUTURE OF 202-220 SOUTH STATE STREET
CHICAGO, ILLINOIS**

Signatory:

Advisory Council on Historic Preservation

Date _____

Reid Nelson, Executive Director

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AND THE ILLINOIS STATE HISTORIC PRESERVATION
OFFICER REGARDING
THE FUTURE OF 202-220 SOUTH STATE STREET
CHICAGO, ILLINOIS**

Signatory:

Illinois State Historic Preservation Officer

_____ Date _____

Natalie Phelps Finnie, Director, Illinois Department of Natural Resources

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CONCURRING PARTY SIGNATURE PAGE

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PROGRAMMATIC AGREEMENT
AMONG
THE UNITED STATES GENERAL SERVICES ADMINISTRATION,
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
AND THE ILLINOIS STATE HISTORIC PRESERVATION
OFFICER REGARDING
THE FUTURE OF 202-220 SOUTH STATE STREET
CHICAGO, ILLINOIS

Concurring Party:

Organization

_____ Date _____
Name and Title

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Appendix C
Management Procedures Memorandum
No. 2015-01

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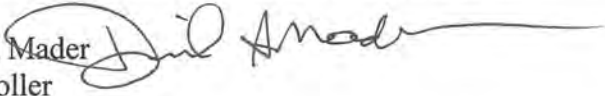
EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

THE CONTROLLER

March 25, 2015

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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Appendix D

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

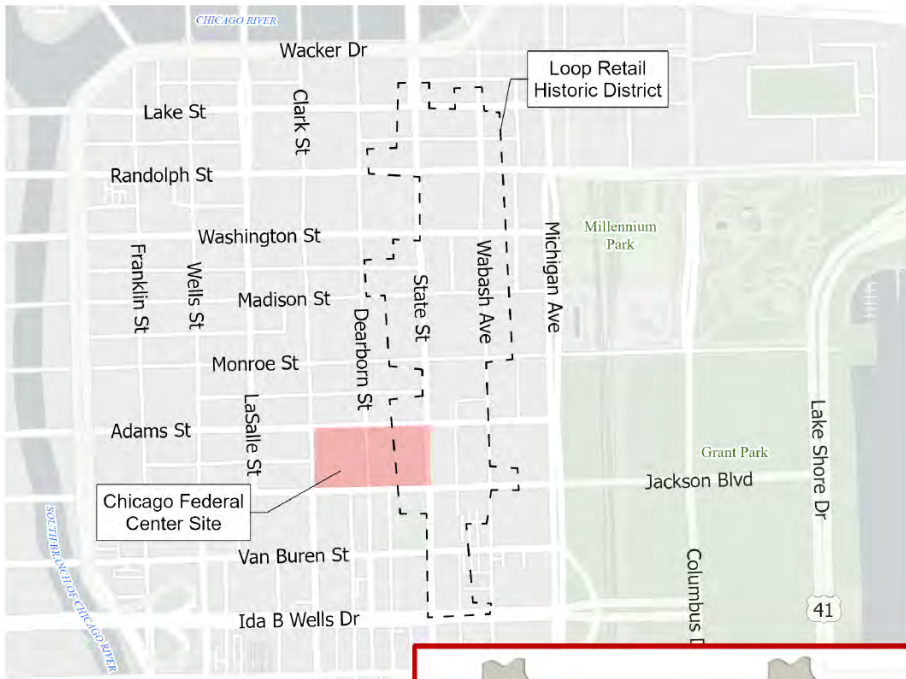
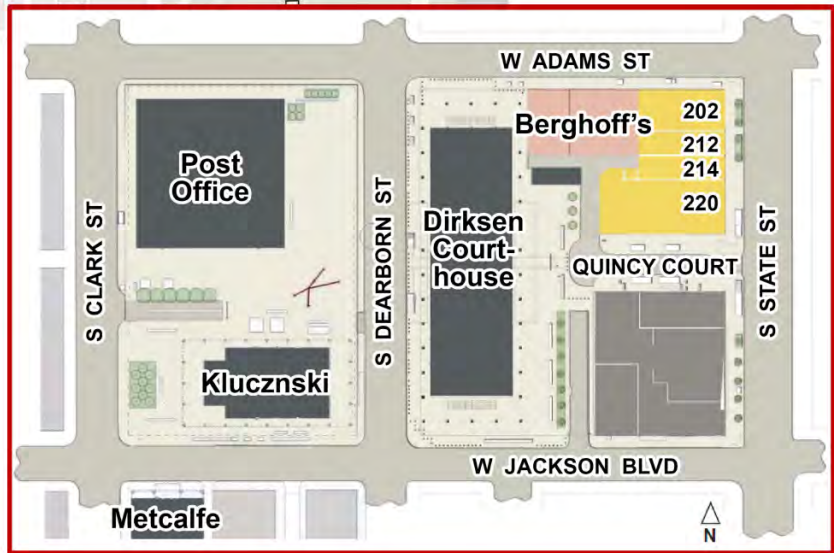


Figure 1. Site Location
 202, 208-212, 214, and 220
 South State Street in Chicago





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, "McPeek, 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>, "McPeck, 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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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:

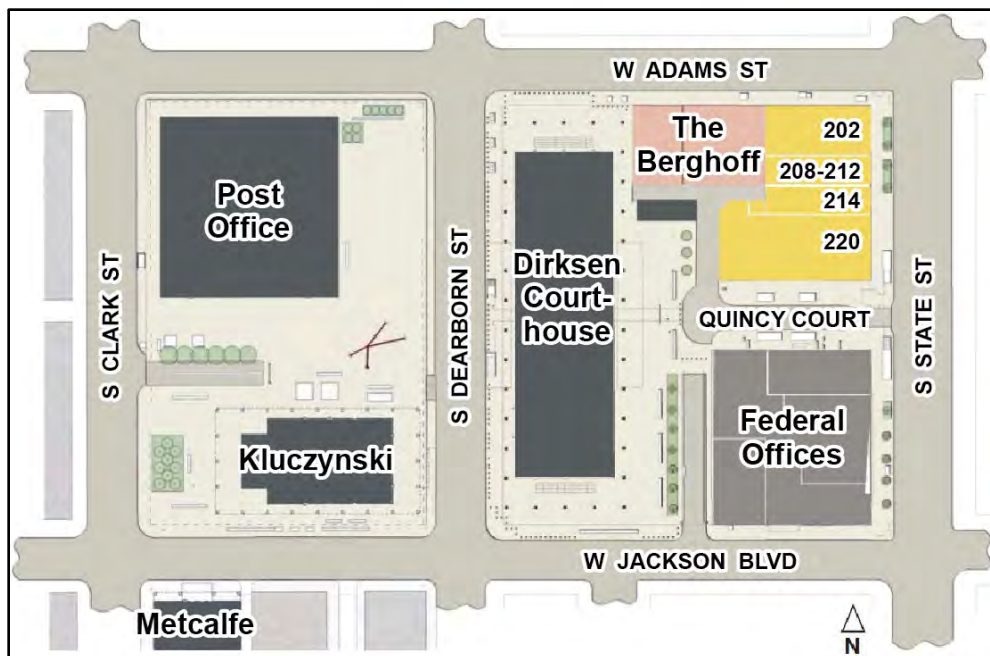
Attachment 1: Project Location Maps



Site Location Map



Site Aerial View





REGION 5

CHICAGO, IL 60604

October 25, 2023

Joseph Mulligan
U.S. General Services Administration
230 South Dearborn Street, Suite 3600
Chicago, Illinois 60604

Re: EPA Comments – Draft Environmental Impact Statement for the Buildings at 202, 214, and 220 South State Street; Chicago, Illinois

Dear Mr. Mulligan,

The U.S. Environmental Protection Agency (EPA) has reviewed the U.S. General Services Administration's (GSA) Draft Environmental Impact Statement (DEIS) regarding the future of three vacant Federally-owned buildings located at 202, 214, and 220 South State Street in Chicago, Illinois. This letter provides EPA's comments on the DEIS pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The DEIS assesses the environmental impact of alternatives for the future of three vacant GSA-owned buildings located east of the Everett McKinley Dirksen U.S. Courthouse (Dirksen Courthouse) in downtown Chicago, Illinois. The 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 buildings to the Loop Retail Historic District, which is listed on the National Register of Historic Places (National Register). The building at 214 South State Street was found to not contribute to the Loop Retail Historic District when it was listed because it lacked integrity due to extensive exterior alterations. However, it retains a distinctive Moderne-style¹ storefront from the 1940s, which falls within the period of significance for the Loop Retail Historic District. Therefore, GSA considers 214 South State Street as contributing to the Loop Retail Historic District for purposes of this undertaking and the DEIS. In 2022, Preservation Chicago announced the Century and Consumers buildings as their top candidate for the Chicago Seven Most Endangered Buildings. These buildings have been part of Preservation Chicago's "most endangered" list since 2011.

The project site is a half-acre in size, bounded by State Street on the east, Adams Street on the north, the Dirksen Courthouse and The Berghoff restaurant on the west, and Quincy Court on the south. The Federal government owns the entire block, except for the two privately-owned parcels containing The

¹ The Moderne style of architecture is closely related to art deco. It originated in France in the 1920s.

Berghoff restaurant. In the wake of a bombing attempt on the Dirksen Courthouse in 2005, GSA requested Congressional permission to acquire land to create a security buffer zone adjacent to the Dirksen Courthouse. Congress authorized funding for GSA to acquire a 1.3-acre block adjacent to the Dirksen Courthouse, including the 202-220 South State Street buildings and three buildings on the south side of Quincy Court. The intent of the 1.3-acre property acquisition 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 acquired the buildings in 2007 to create a buffer zone integral to the security of the Dirksen Courthouse. There is currently no Federal occupancy need for them.

In recent years, Federal law enforcement agencies extensively studied and determined that the buildings pose a specific and significant security threat to the Dirksen Courthouse. Additionally, in March 2022, Congress passed the 2022 Consolidated Appropriations Act² which provided funding to GSA for the demolition of the buildings located at 202, 208-212³, 214, and 220 South State Street, Chicago, Illinois.

The Proposed Action evaluated in the DEIS is to address the future of the three vacant buildings at 202, 214, and 220 South State Street. The purpose of the Proposed Action is to address the security needs of the Dirksen Courthouse, considering Congress' 2022 authorization of funds and authority given to GSA to demolish the buildings at 202-220 South State Street. The Proposed Action is specifically needed for the following reasons: (1) to address the security needs of the Dirksen Courthouse; (2) to evaluate reasonable alternatives that would meet the purpose and need of the Proposed Action in light of the Congressional Intent of the 2022 Consolidated Appropriations Act; and (3) to manage⁴ Federal Assets.

The No Action Alternative and two Action Alternatives were studied in the DEIS. A Preferred Alternative was not identified in the DEIS. The Alternatives are as follows:

- **Alternative A (Demolition)** – Alternative A proposes demolition of the three vacant buildings. Demolition would enable the potential reorientation of the public entrance to the Dirksen Courthouse to its east side by allowing for public access from South State Street, providing a significantly larger and more useful adjacent public space than that provided at the current Dearborn Street public entrance.
- **Alternative B (Viable Adaptive Reuse)** - Alternative B would involve collaborating with one or more developers who would use the three buildings at 202, 214, and 220 South State Street in

² Public Law No. 117-103

³ In March 2023, there were two areas of partial collapse and areas of near collapse in the 208-212 South State Street building, which could have resulted in structural failure. GSA proceeded with an emergency action to demolish 208-212 South State Street; the demolition was coordinated with CEQ in accordance with NEPA, the National Historic Preservation Act of 1966 (NHPA), and with concurrence from the Illinois State Historic Preservation Office (SHPO). The building at 208-212 South State Street was demolished from April to June 2023 and resulted in no significant impacts to the environment or to cultural resources.

⁴ Federal agencies, including GSA, are required to reduce their real estate footprint in accordance with their statutory mission, in addition to a series of presidential memorandums and implementation policies.

accordance with the required Federal viable adaptive reuse criteria.⁵ These criteria are necessary to meet security objectives for the Dirksen Courthouse and would apply to any future uses of the 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 C (No Action Alternative)** - Under the No Action Alternative, GSA would continue to monitor the buildings' conditions and secure the buildings. The buildings would remain in place, vacant, and in need of significant repairs. GSA would continue to have limited federal funds available to continue with required maintenance, including façade inspections, emergency repairs (as needed), and security.

EPA previously provided scoping comments on this project to GSA on December 12, 2022. EPA's detailed comments on the DEIS are enclosed with this letter. We recommend that the GSA address these comments and our recommendations, which generally relate to project alternatives, National Historic Preservation Act concerns, energy efficiency and environmental best practices, and greenhouse gases and climate change.

Thank you for the opportunity to review and provide comments on the DEIS. When the Final EIS (FEIS) is released, please notify our office electronically at R5NEPA@epa.gov. If you have any questions about this letter or wish to discuss EPA's comments, please contact the lead NEPA Reviewer, Liz Pelloso, at 312-886-7425 or via email at pelloso.liz@epa.gov.

Sincerely,

Krystle Z. McClain, P.E.
NEPA Program Supervisor
Tribal and Multimedia Programs Office

Enclosures (2):

EPA Detailed Scoping Comments
Construction Emission Control Checklist

CC (with enclosures):

C.J. Wallace, IL SHPO (carol.wallace@illinois.gov)
Laura Lavernia, ACHP (llavernia@achp.gov)
Mark Buechel, NPS (mark_buechel@nps.gov)

⁵ See Section 2.1.2 of the DEIS.

EPA DEIS Comments: The Buildings at 202, 214, and 220 South State Street
Chicago, Illinois

October 25, 2023

PROJECT ALTERNATIVES

- In 2017, the GSA was poised to enter into an agreement with the City of Chicago and a private real estate developer that would have resulted in the adaptive reuse of the Century and Consumers Buildings as housing. That project did not come to fruition, but such an agreement shows that housing is an economically viable adaptive reuse for these buildings. The viable adaptive reuse criteria⁶ required for implementation under Alternative B were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies. Criterion #2 prohibits short-term or long-term residential or lodging, places of worship, or medical treatment, services, or research in these buildings. However, the DEIS did not explain why residential use, or the other specified uses, are prohibited.

Recommendations for the FEIS: Provide additional context and information on the prohibited uses specified in the viable adaptive reuse criteria.

- The Chicago Collaborative Archive Center (CCAC) has approached GSA with a proposal to restore the existing buildings in a manner that would meet Federal security needs. Several groups and individuals have been discussing the development of an innovative multi-faceted archival center in downtown Chicago since the summer of 2020. The CCAC is proposing a national archive center that would employ archival standards to preserve unique and irreplaceable collections. Archival storage requires limited light and 24-hour climate-control. The CCAC partnership notes that security is one of their highest concerns as their collections contain unique and irreplaceable documents. A remodeled CCAC building would require multilayer access control, security personnel, surveillance security systems, scaled zones of security throughout the buildings, security policies, incident response plans, as well as limited staff with board approval and security clearances. The CCAC states that they are committed to work with the GSA to find the best possible security for the site. The DEIS did not discuss the ongoing coordination between GSA and the CCAC and did not identify the potential for CCAC reuse as even an example of how Alternative B (Viable Adaptive Reuse) could come to fruition.

Recommendations for the FEIS: Provide additional context and information regarding the coordination between GSA and CCAC, and on any other Viable Adaptive Reuse projects that are currently under consideration.

- Appendix B (Section 106 consultation) included information provided by GSA's Outleasing Project Manager in June 2023. Specifically, Brian Tye (GSA) presented information on partial-building outleases and full-building ground leases for the State Street properties. Under this contract type, a tenant can redevelop a property during the lease period, and after the lease period the development or operation of the property is returned to the property owner (GSA). This lease type

⁶ See Section 2.1.2 of the DEIS.

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 to allow 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 any financial investments or transfer of property ownership.

Consideration of ground leases can come in two forms: (1) in-kind, such as improvements to the property; and (2) rent. In-kind contributions in the form of property improvements often play a large role in the lease of structures with significant backlogs of deferred maintenance and repairs, such as is the case with the State Street buildings. The Federal government can consider all leasing alternatives that align with the 15 required viable adaptive reuse criteria for the State Street buildings, that ensure that assets (the buildings) are preserved, that have long term economic viability and cash flow (in order to fund repairs and pay rent), and that comply with local planning. There are existing outleases (including partial building outleases⁷) occurring locally in Chicago, including a master outlease⁸ of the first floor of the William O. Lipinski Federal Building (844 N Rush St, Chicago).

The DEIS did not discuss the possibility of outleasing or ground leases, on their own or as part of Alternative B.

Recommendations for the FEIS: Provide information on how GSA approaches outleases (as they relate to Alternative B), including how GSA engages the market through a request for information in order to gauge interest, explores uses, and determines financial viability. Should GSA select Alternative B in the FEIS, discuss how GSA would proceed with reuse, including if there would be a Request for Proposal for an outlease and “best value source selection procedures,” which look at cost and technical factors, to select an outleasee/developer for the space.

NATIONAL HISTORIC PRESERVATION ACT CONCERNS

- Implementation of an action alternative would need to follow requirements of the National Historic Preservation Act (NHPA) and applicable Executive Orders. Section 110 of the NHPA sets out the broad historic preservation responsibilities of Federal agencies and is intended to ensure that historic preservation is fully integrated into the ongoing programs of all Federal agencies and that each Federal agency considers its activities' effects on our nation's historic properties. This responsibility extends to a systematic consideration of properties not under the jurisdiction or control of the agency, but potentially affected by agency actions.

NHPA Section 110(a) states, “*Historic properties under the jurisdiction or control of the agency are to be managed and maintained in a way that considers the preservation of their historic, archeological, architectural, and cultural values.*” Section 110(a)(1) and Section 110(a)(1)(B) note that in cases where historic property is under the jurisdiction and control of an agency, the agency

⁷ GSA has existing partial ground leases in buildings adjacent to the Dirksen Courthouse. This includes outlease tenants in GSA buildings on State Street and additional retail along Jackson Boulevard and south of Quincy Court.

⁸ A master outlease allows a developer to lease the entire first floor and then sublease the retail spaces within it to different users.

has an affirmative responsibility to manage and maintain such property in a manner that takes into account the property's historic significance. In addition, the Federal agency has an affirmative responsibility to seek and use historic properties to the maximum extent feasible in carrying out its activities.

Additionally, Executive Order 13006 (Locating Federal Facilities on Historic Properties in our Nation's Central Cities) states, "*The Federal Government shall utilize and maintain, wherever operationally appropriate and economically prudent, historic properties and districts, especially those located in our central business areas.*"

There are eight National Historic Landmark (NHL) properties identified within the project's Area of Proposed Effect⁹ (APE); seven are buildings and one is a Historic District. Demolishing 202 and 220 South State Street could compromise the existing UNESCO World Heritage Site nomination¹⁰ for "Chicago's Early Skyscrapers¹¹." While 202 and 220 South State Street are not among the nine buildings included in the UNESCO nomination, they are examples of Chicago's early skyscrapers. A UNESCO World Heritage Site designation would further recognize Chicago's contributions to the built environment and increase education regarding these architecturally significant structures.

Recommendations for the FEIS:

- We reiterate our 2022 scoping comments as follows:
 - Discuss how NHPA Section 110 applies to the project and describe how GSA will meet the requirements of Section 110; and
 - Assess options for documenting historic building information prior to demolition, should Alternative A be selected;
- Provide an update on the NHPA Section 106 consultation process, particularly in light of the Preferred Alternative that will be identified in the FEIS and that consulting party meetings occur approximately once a month;
- Provide additional background information on the 2022 Consolidated Appropriations Act's

⁹ The APE encompasses an area where historic properties could potentially experience direct or indirect effects from the Proposed Action. The APE is not just the project footprint; it includes an area around the project footprint to account for changes within the viewshed of the properties and the Loop Retail Historic District, as well as potential effects from construction or demolition.

¹⁰ Nomination refers to the U.S. World Heritage Tentative List ("Tentative List") to the United Nation's Educational, Scientific and Cultural Organization (UNESCO) World Heritage List. The World Heritage List is an international list of cultural and natural properties nominated by the signatories to the World Heritage Convention (1972), an international treaty for the preservation of natural and cultural heritage sites of global significance. The Secretary of the Interior, through the National Park Service, is responsible for identifying and nominating U.S. sites to the World Heritage List. Proposed U.S. sites must be either federal property, such as national parks, or sites already designated as national historic landmarks or national natural landmarks.

¹¹ 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.

authority and funding to demolish the buildings; and

- Should Alternative A be selected, provide commensurate justification as to why demolition is GSA's preferred alternative. Demolition is not consistent with the City of Chicago's planning goals and is expected to result in adverse effects to adjacent Historic Districts and NHPA-listed properties, and negative and long-term impacts to NHLs, viewsheds from the historic districts, and other historic properties within the APE.
- Information presented in Appendix B (Section 106 Consultation) described the current state of each of the buildings. Specifically, the four buildings were shut down for safety concerns in the mid-2000s. The buildings have not been occupied or their systems operated for 15+ years. While 202, 214, and 220 South State Street have varying significant interior and exterior issues¹², the buildings are structurally sound. Regardless, National Park Service (NPS) representatives stated that the effects of demolition by neglect should be considered, including a comparison of the conditions when the buildings were purchased (2007) to current conditions. NPS also noted that the NHPA says that a Federal agency in possession of historic property is required to maintain it whether it is used or not. GSA has not maintained more than the bare minimum of exterior maintenance for safety.

Recommendations for the FEIS: Provide clearer information on the conditions of 202, 214, and 220 South State Street when they were acquired. Compare the initial building conditions to current conditions. Provide additional information on why GSA has not properly maintained any of the buildings since the time they were acquired.

ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES

- Energy efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.

Recommendations for the FEIS: GSA should consider committing to the following:

- Recycling a high percentage of construction and demolition debris;
- Establishing material hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents. Identify potential material hauling routes.
- Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to:
 - Using recycled materials to replace carbon-intensive Portland Cement in concrete as "supplementary cementitious material;" and
 - Using recycled materials in pavement applications, such as crushed recycled

¹² Many of the noted conditions (e.g., façade degradation, water ponding on roofs/roof issues, active water leaks, water in basements/sub-basements, non-functional alarm systems, localized water leaks) have persisted or worsened over the past decades or relate to outdated mechanical equipment.

concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

- Assuming Alternative A is selected:
 - Ensuring areas adjacent to the buildings and project footprint be considered for conversion to native habitats, increasing the area which can be beneficially used for wildlife, stormwater infiltration or detention, and aesthetics, among other functions; and
 - Identifying and implementing opportunities for additional green stormwater management practices, such as bioswales and rain gardens;
- Assuming Alternative B is selected:
 - Achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for retrofit and remodeling projects associated with the project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion sensed lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages GSA to commit to analyze the strengths and feasibility of these strategies; and
 - Discussing to what extent GSA will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order 13693.

GREENHOUSE GAS REDUCTION AND CLIMATE CHANGE

- As EPA noted in our 2022 scoping comments, the proposed project would release greenhouse gas (GHG) emissions under either action alternative during construction from trucks hauling materials, workers' vehicles, and operation of construction equipment. It is important for GSA to fully quantify and disclose emissions from emissions from the No Action alternative and all action alternatives and discuss the implications of those emissions in light of science-based policies established to avoid the worsening impacts of climate change.

As EPA previously stated to GSA, estimates of the social cost of greenhouse gases (SC-GHG¹³) are informative for assessing the impacts of GHG emissions. SC-GHG estimates allow analysts to 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 scenarios) within the DEIS

¹³ 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.

would have informed project decision-making and provide clear support for implementing all practicable measures to minimize GHG emissions and releases. The DEIS did not include calculations of the social cost of greenhouse gases.

On January 9, 2023, the Council on Environmental Quality published interim guidance to assist Federal agencies in assessing and disclosing climate change impacts during environmental reviews¹⁴. CEQ developed this guidance in response to Executive Order 13990 - Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. This interim guidance was effective immediately. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process.

While GSA's NEPA process was on-going when the 2023 guidance was published, that does not negate GSA's responsibility to implement the guidance. EPA recommends the FEIS apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.

Recommendations for the FEIS: Apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues for all alternatives, including the Preferred Alternative once selected. Additional recommendations are as follows:

Emissions & SC-GHG Disclosure and Analysis

- Include a detailed discussion of the project's reasonably foreseeable direct and indirect GHG emissions (for all alternatives) in the context of actions necessary to achieve Illinois' policies and GHG emission reduction goals¹⁵ as well as national policy and GHG emission reduction goals over the anticipated project lifetime, including the U.S. 2030 Paris targets and the 2050 goal for net-zero energy emissions.
- Provide additional context and calculations regarding how the estimated Greenhouse Gas Emissions were calculated in the DEIS.
- Quantify estimates of all direct and indirect GHG emissions¹⁶ from the proposed project over its anticipated lifetime for all alternatives, including the No Action Alternative, broken out by GHG type. Include and analyze potential upstream and downstream GHG emissions.
- Use comparisons of GHG emissions and SC-GHG across alternatives to inform project decision-making.

¹⁴ See: <https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate>

¹⁵ Illinois' Climate and Equitable Jobs Act (SB 2408) lays out multiple goals; see: <https://www2.illinois.gov/HISNews/23893-Climate-and-Equitable-Jobs-Act.pdf>

¹⁶ As discussed in Section IV(A) of CEQ's 2023 interim guidance, "agencies generally should quantify all reasonably foreseeable emissions associated with a proposed action and reasonable alternatives (as well as the no-action alternative). Quantification should include the reasonably foreseeable direct and indirect GHG emissions of their proposed actions. Agencies also should disclose the information and any assumptions used in the analysis and explain any uncertainty. In assessing a proposed action's, and reasonable alternatives', reasonably foreseeable direct and indirect GHG emissions, the agency should use the best available information."

- Use SC-GHG estimates to disclose and consider the climate damages from net changes in direct and indirect emissions of CO₂ and other GHGs resulting 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).¹⁷ When applying SC-GHG estimates, just as with tools to quantify emissions, GSA should 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.

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 the environmental impacts of the proposed project and alternatives.
- Incorporate robust climate resilience and adaptation considerations into (1) project design and engineering; (2) construction oversight; (3) commitments for protective measures related to stormwater and erosion; and (4) routine monitoring during operations. The FEIS should describe how GSA has addressed such considerations and provide a rationale for any reasonable alternatives to enhance resilience that were not adopted or discussed in detail.

Reduction and Mitigation

- Identify practices to reduce and mitigate GHG emissions; include commitments to do so in the FEIS. We recommend GSA consider practices in the enclosed Construction Emission Control Checklist.

OTHER COMMENTS

- The DEIS did not state how comments received during the public comment period would be responded to by GSA in the FEIS.

Recommendations for the FEIS: Create an appendix to include all comments received during the DEIS comment period – including any applicable transcripts of comments from the public, and all comment letters received. For all government agency letters received, include GSA’s responses to specific comments from each letter. Responses to public comments should also be included. EPA also recommends that the appendix include all correspondence sent to and received from the resource agencies regarding the project.

¹⁷ 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.

U.S. Environmental Protection Agency **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.¹ We recommend GSA consider the following protective measures and commit to applicable measures in the Final EIS.

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 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.).²
- 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.).³
- 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).⁴
- 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).
- 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

¹ Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. *The Lancet*. June 15, 2012

² <http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm>

³ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

⁴ <https://www.epa.gov/emission-standards-reference-guide/all-epa-emission-standards>

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 National Institute for Occupational Safety and Health approval number.

NEPA Documentation

- Per Executive Order 13045 on Children's Health⁵, EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.
- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

⁵ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA views childhood as a sequence of life stages, from conception through fetal development, infancy, and adolescence.



DEPARTMENT OF PLANNING AND DEVELOPMENT
CITY OF CHICAGO

October 31, 2023

Joseph Mulligan
General Services Administration
230 South Dearborn Street, Suite 3600
Chicago, Illinois 60604

Re: Draft Environmental Impact Statement for 202-220 South State Street

Dear Mr. Mulligan:

Please find our comments below on the Draft Environmental Impact Statement (EIS) for 202-220 South State Street.

Draft EIS Edits

City of Chicago Department of Planning & Development (DPD) staff provided comments at the November 10, 2022, NEPA/GSA scoping meeting. DPD should be included in the list of non-federal agency stakeholders who provided comments at this meeting on pages ES-10 and 1-11.

Significance of the Lower Floors of the 202-220 South State Street Buildings

Draft EIS discussion of the Century Building (202 South State Street) omitted the significance of the 1951-1952 remodeling of the first and second floor exteriors. The Century Building's dramatic, floor-to-ceiling, curving-plate-glass storefront trimmed in stainless steel is an example par excellence of the International Style "open front" storefront which prioritized views into buildings such that the interior commercial space became the display. Their preservation is all the more important due to the rare survival of such mid-century designs. Of the six International Style structures included in the 1998 National Register-listed Loop Retail Historic District, one has been demolished, four buildings' storefronts have been entirely remodeled, and only the Century Building's storefront remains intact. (The Commission on Chicago Landmarks' preliminary summary of information for the Century Building discussing this is attached.)

Likewise, the special significance of the marble-clad, classically detailed vestibule and lobby of the Consumers Building (220 South State Street) was not discussed in the draft EIS. The Consumer Building's vestibule and lobby look much like they did when the structure was completed in 1913. As such, they are especially noteworthy as a rare surviving example of an early twentieth-century professional office building vestibule and lobby in Chicago. Staff know of no other equivalent, extant 1910s vestibule and lobby in the Loop. (The Commission on Chicago Landmarks' preliminary summary of information for the Consumers Building discussing this is attached.)

Finally, although the 214 South State Street building is not being considered for landmark status by the City of Chicago, it is also worth stating that staff know of no other intact Moderne-style retail storefronts remaining in the Loop. The loss of these three buildings' lower floors would erase permanently these last-surviving connections to the pedestrian-level experience of State Street's history in the different phases of the early twentieth century.

Local Impact

As noted in the draft EIS, the Commission on Chicago Landmarks voted to preliminarily landmark the Century Building (202 South State Street) and the Consumers Building (220 South State Street) at its April 13, 2023, regular monthly meeting. The Commissioner of the Department of Planning & Development submitted the attached report recommending landmark designation to the Commission at its May 4, 2023, meeting. As the Government Services Administration (GSA) has not consented to the designation, a public hearing is scheduled for November 13, 2023, which will allow the Commission to hear any additional evidence with regard to the proposed designation that should be considered when the final landmark designation recommendation is included on their agenda for a vote.

The Commission did not undertake this step lightly and gave time to allow the Section 106 process to unfold to better understand the security vulnerabilities asserted by the federal government for the Dirksen U.S. Courthouse. Designation ordinances were crafted with additional guidelines which would allow for the flexibility which may be needed to accommodate GSA's 15 reuse criteria for the Century and Consumers Buildings which were developed in collaboration with the United States District Court, Northern District of Illinois, and federal law enforcement agencies.

The proposed designations reflect the level of significance of these structures within the Loop and the larger city in architectural and historical terms, but also in the context of larger planning efforts by the City. Chicago uses landmark designation to preserve "the scale, density, architectural style, pedestrian interest and distinctive character" of districts like State Street which "give the Central Area its world-famous character" and is "critical to maintaining Chicago's exceptional quality of life" as noted by its Central Area Action Plan.

Therefore, we agree with the draft report's conclusions that demolition "would alter character-defining features of the Loop Retail Historic District and Chicago Federal Center" and that "there would be negative, significant, long-term impacts to land use." In simplest terms, demolishing these structures would create a large hole in the historic State Street corridor, Chicago's most historically significant retail corridor. Experience with Block 37 (between Randolph and Washington) and Pritzker Park (between Jackson and Van Buren) has shown that significant demolition along this corridor has had long-term damaging effects on the Loop and would be an irreversible loss of Chicago's architectural legacy.

Sincerely,



Kandalyn Hahn
Historic Preservation Division

Encl.: Preliminary Summary of Information for the Century Building (202 South State Street)
Preliminary Summary of Information for the Consumers Building (220 South State Street)
DPD report to the Commission on Chicago Landmarks

From: [Joseph Mulligan](#)
To: [Stoodley, Victoria](#)
Cc: [Webb, Charlie](#); [Michael Gonczar - 5P1FB](#)
Subject: [EXTERNAL] Fwd: Correction needed
Date: Wednesday, July 24, 2024 5:29:12 PM
Attachments: [Outlook-sw2paopu.png](#)

U.S. General Services Administration

Joe Mulligan

Program Manager
Project Delivery Division
312-505-5426
joseph.mulligan@gsa.gov

----- Forwarded message -----

From: 'Morris, Stephen' via [State Street North Site](#) <statestreet@gsa.gov>
Date: Thu, Nov 16, 2023 at 12:41 PM
Subject: Correction needed
To: statestreet@gsa.gov <statestreet@gsa.gov>

Dear Mr. Mulligan,

I apologize that we have missed the comment deadline for this document, but it has been brought to my attention that it contains an error relating to the World Heritage program in the United States, which my office is responsible for administering.

The sections on Heritage Tourism state that "Chicago's early skyscrapers have been nominated for a UNESCO World Heritage Site." This is not the case. A preliminary group of buildings was added to the U.S.'s World Heritage Tentative List in 2017. This means that the proposal is eligible for future nomination by the U.S. Department of the Interior.

The remainder of the paragraph does not require correction. I hope that this can be addressed in the final document, so as not to cause confusion for readers. Thanks very much.

Sincerely,

Stephen Morris
Chief
Office of International Affairs
National Park Service

Website: <http://www.nps.gov/internationalaffairs>



Jason Meter on behalf of the Chicago Transit Authority (CTA) Planning left the following comment via online comment form on September 18, 2023:

“Street-level access to CTA subway stations, as well as the underground pedway connection between the Red and Blue line stations must be maintained upon completion of any work or demolition at or around the site in question. If absolutely necessary to temporarily impact CTA access or facilities, coordination with CTA must take place as least 30 days in advance of any impacts. Notifications and requests for coordination may be sent to: traffic.planning@transitchicago.com”

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Appendix E

EJScreen Output

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EJScreen Report (Version 2.1)

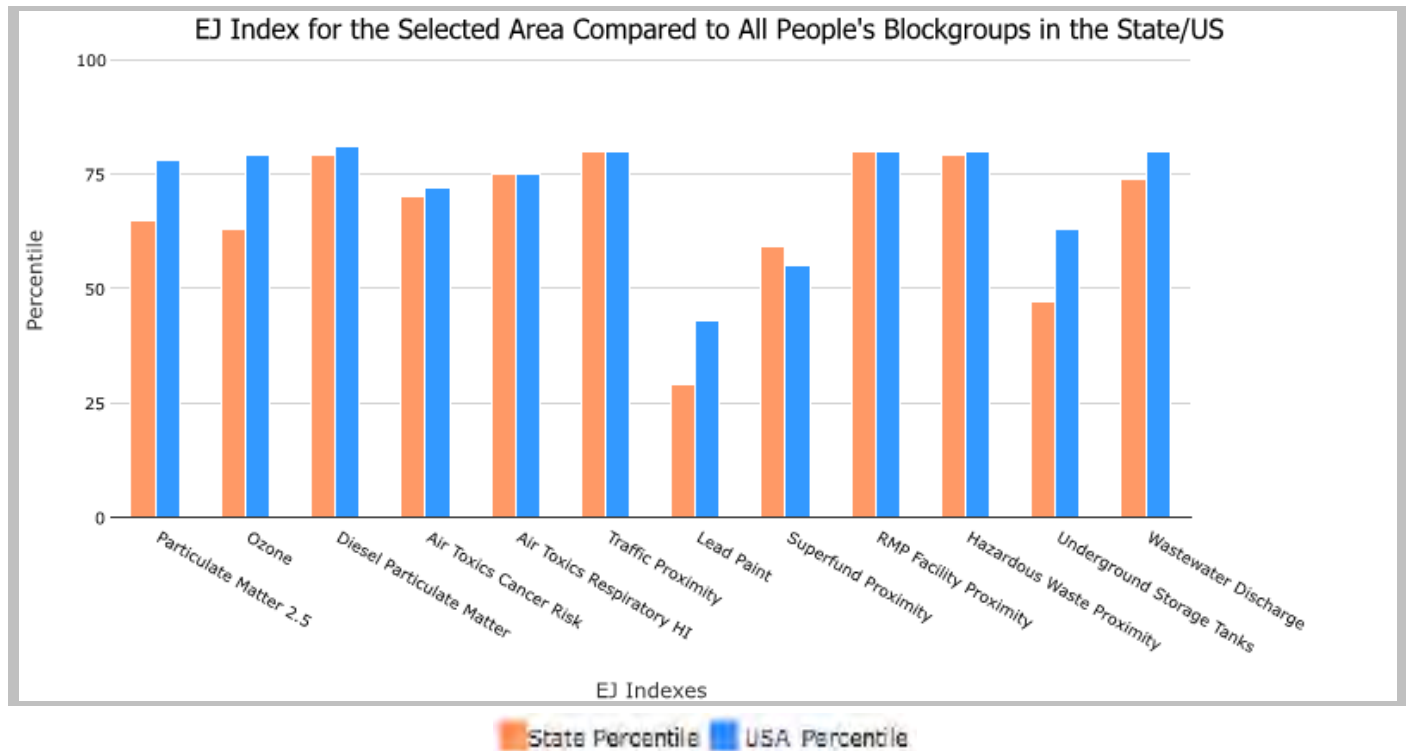


Blockgroup: 170313201011, ILLINOIS, EPA Region 5

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.

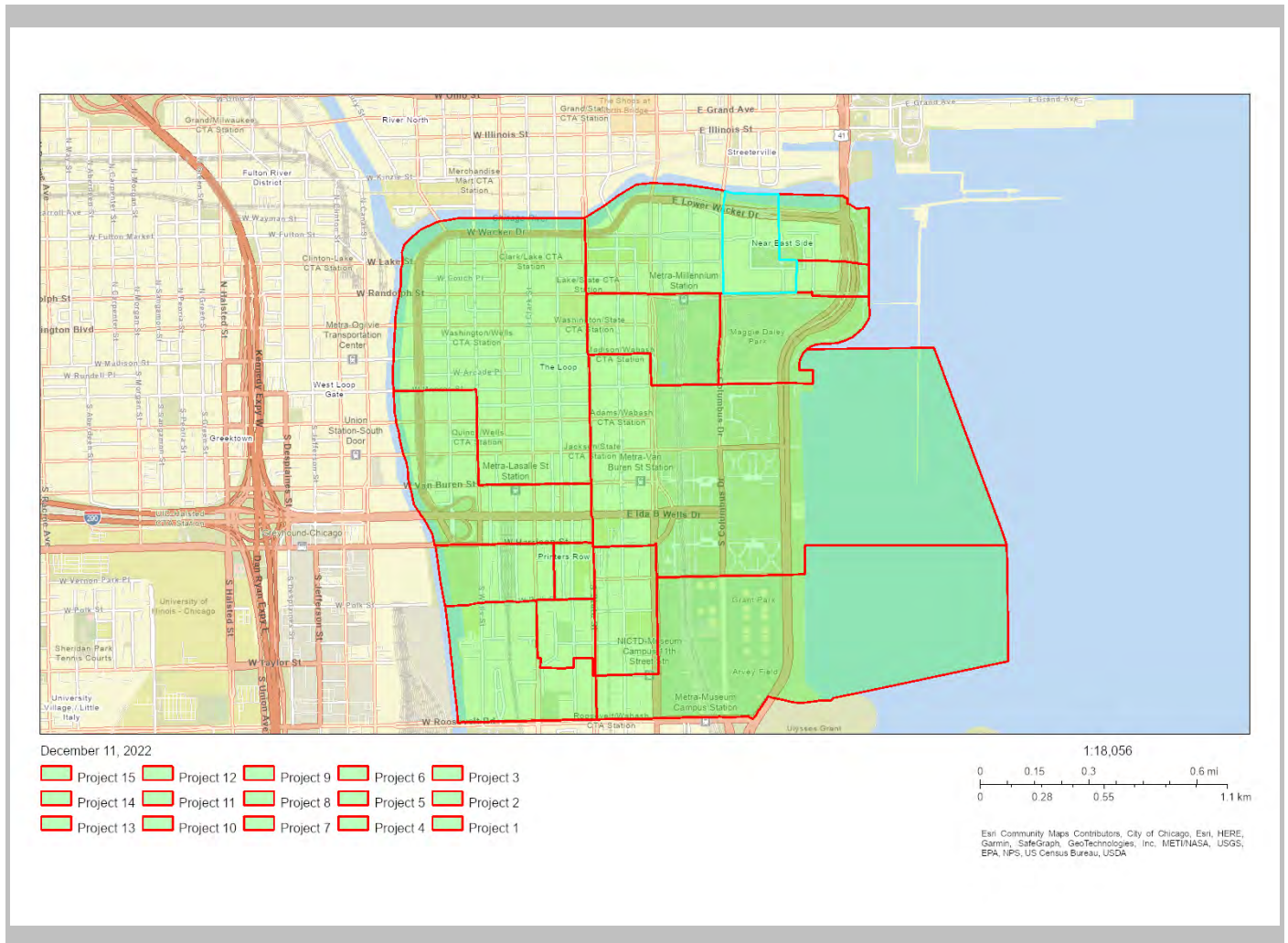
EJScreen Report (Version 2.1)



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>.

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EJScreen Report (Version 2.1)

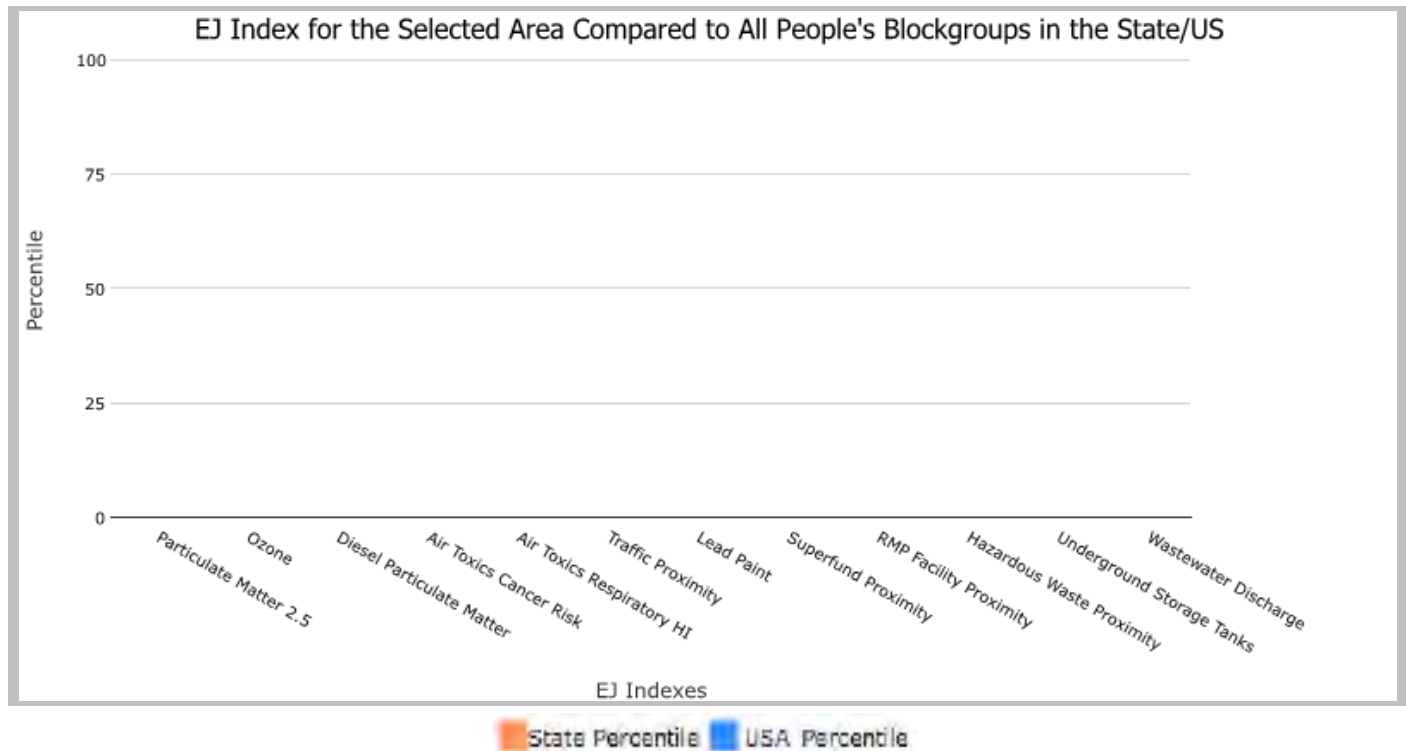


Blockgroup: 170313201012, ILLINOIS, EPA Region 5

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 |



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.

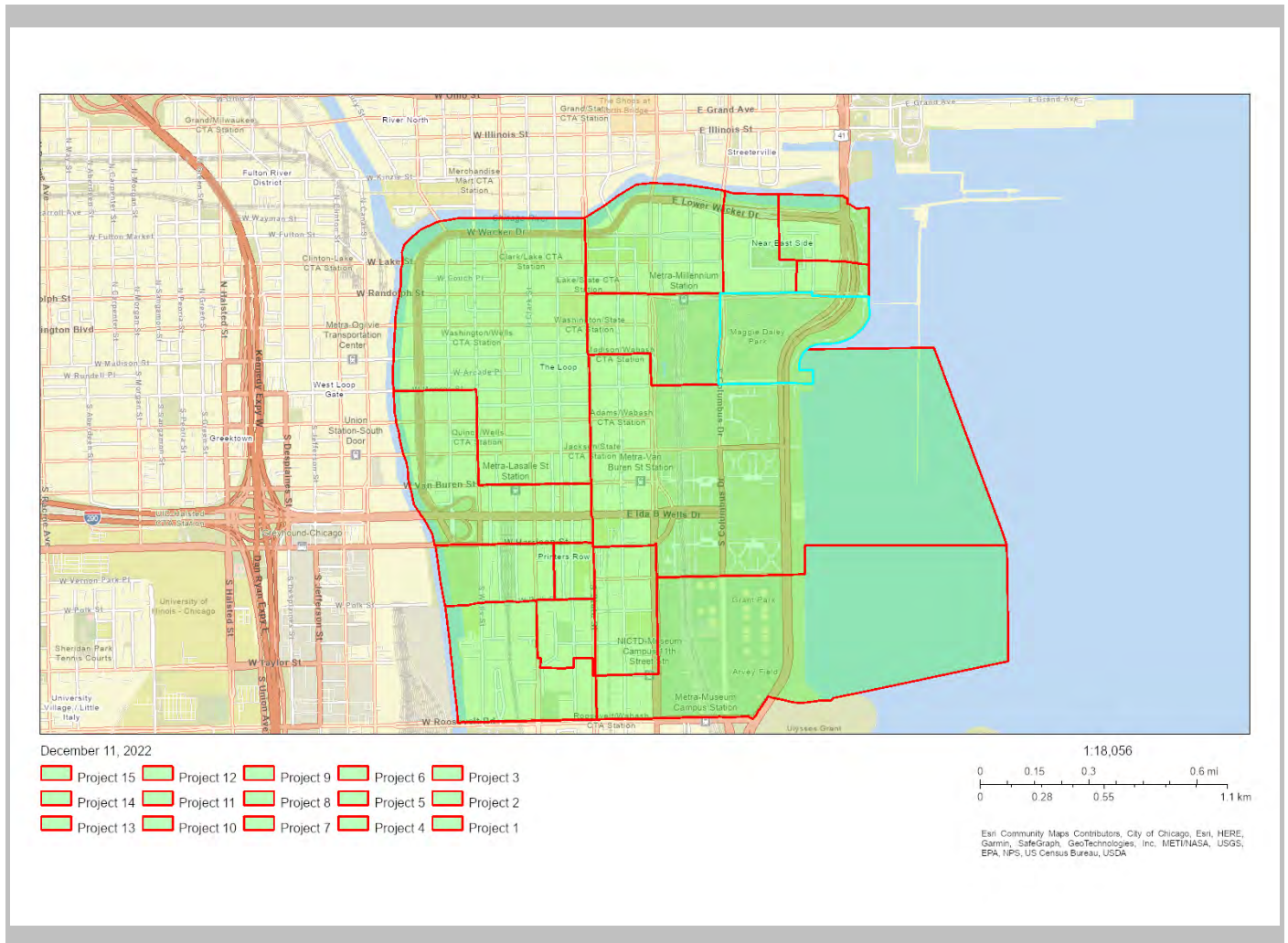
EJScreen Report (Version 2.1)



Blockgroup: 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)

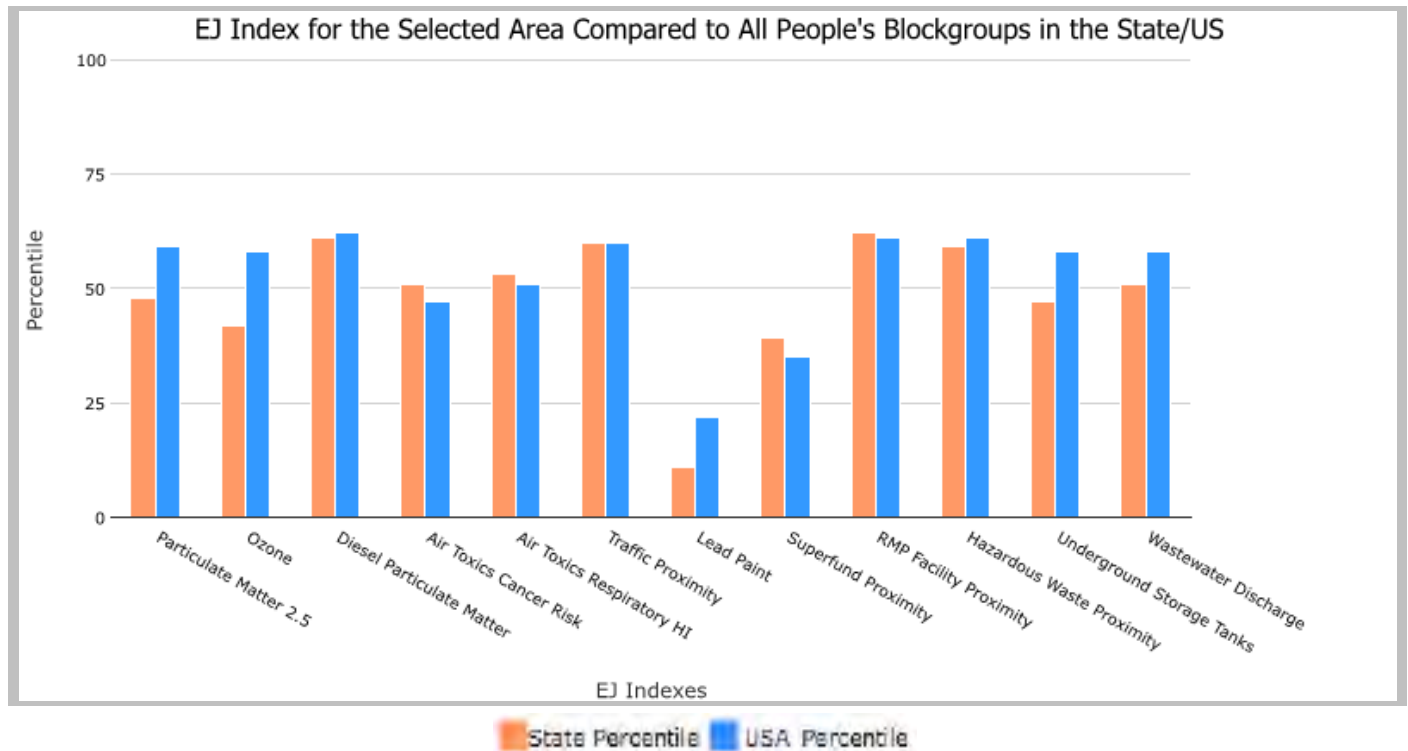


Blockgroup: 170313201013, ILLINOIS, EPA Region 5

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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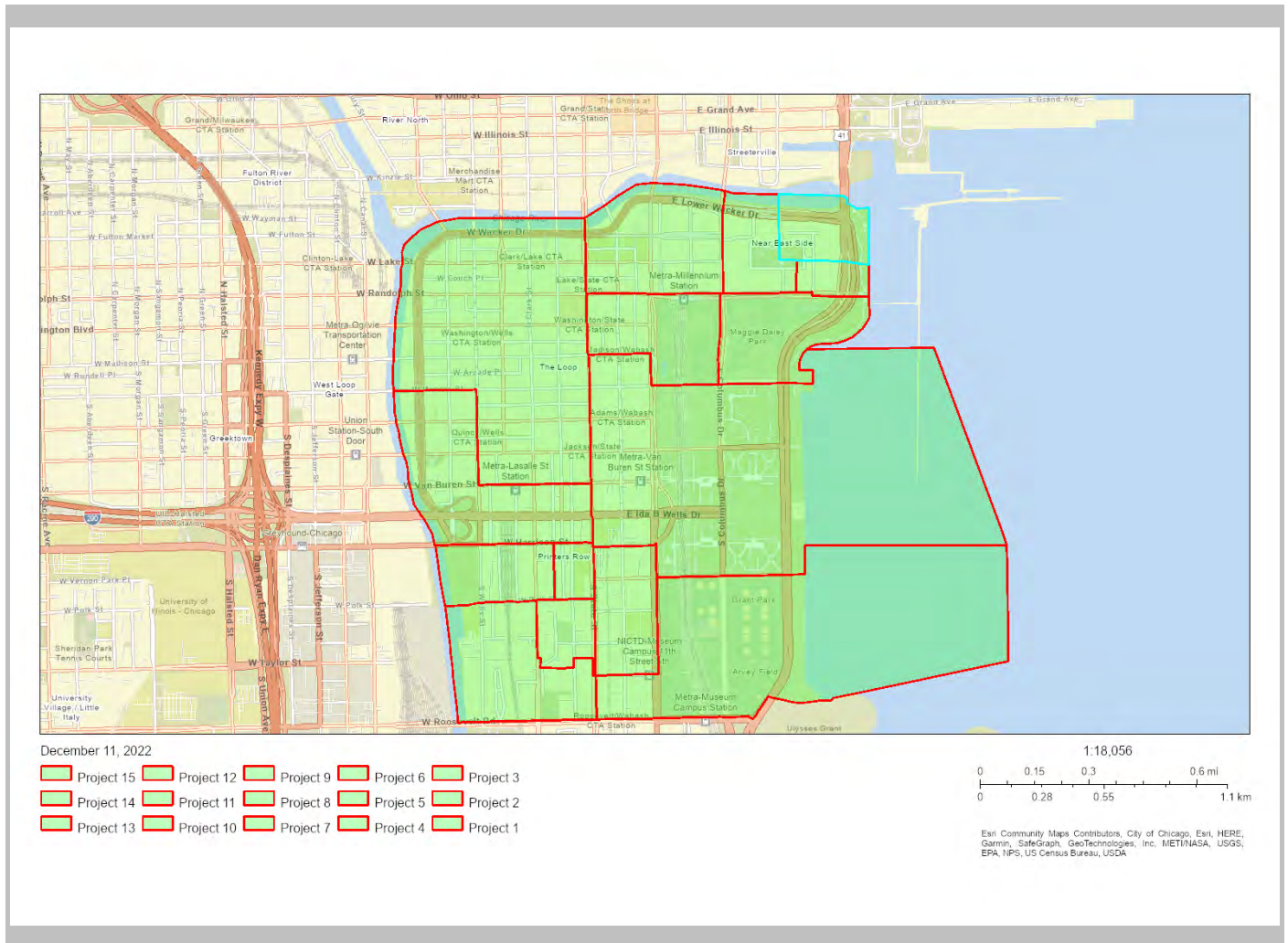
EJScreen Report (Version 2.1)



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 particular 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)

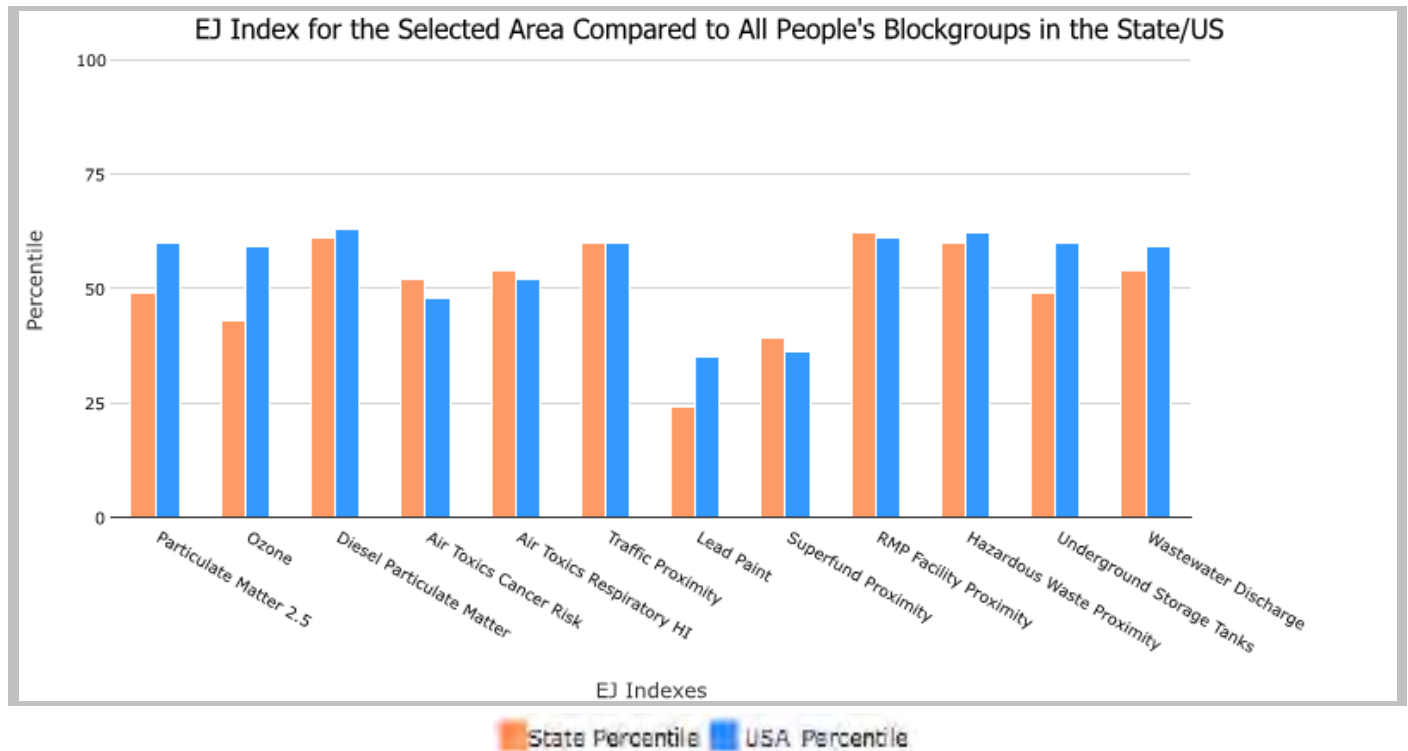


Blockgroup: 170313201021, ILLINOIS, EPA Region 5

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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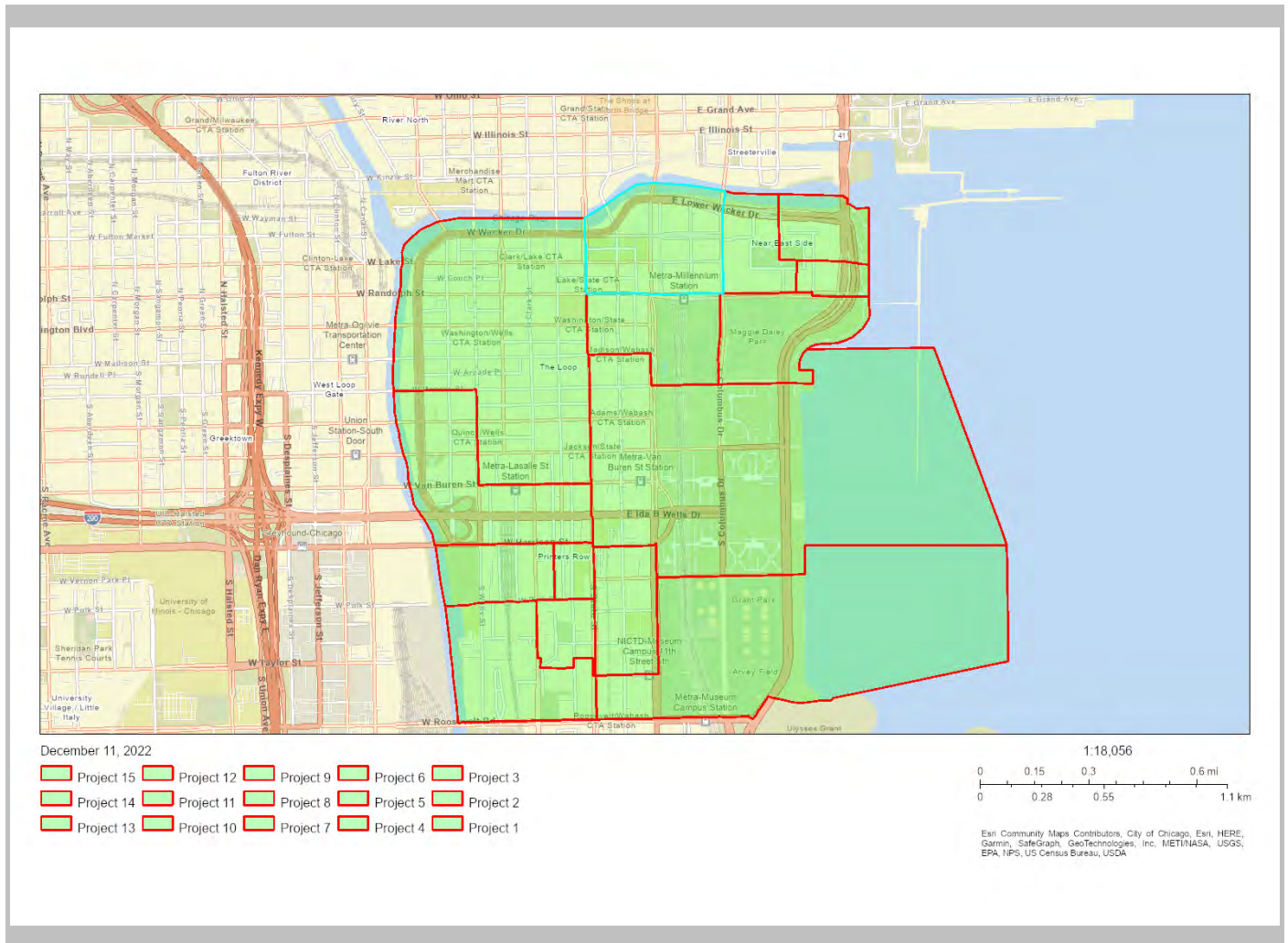
EJScreen Report (Version 2.1)



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>.

For additional information, see: www.epa.gov/environmentaljustice

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EJScreen Report (Version 2.1)

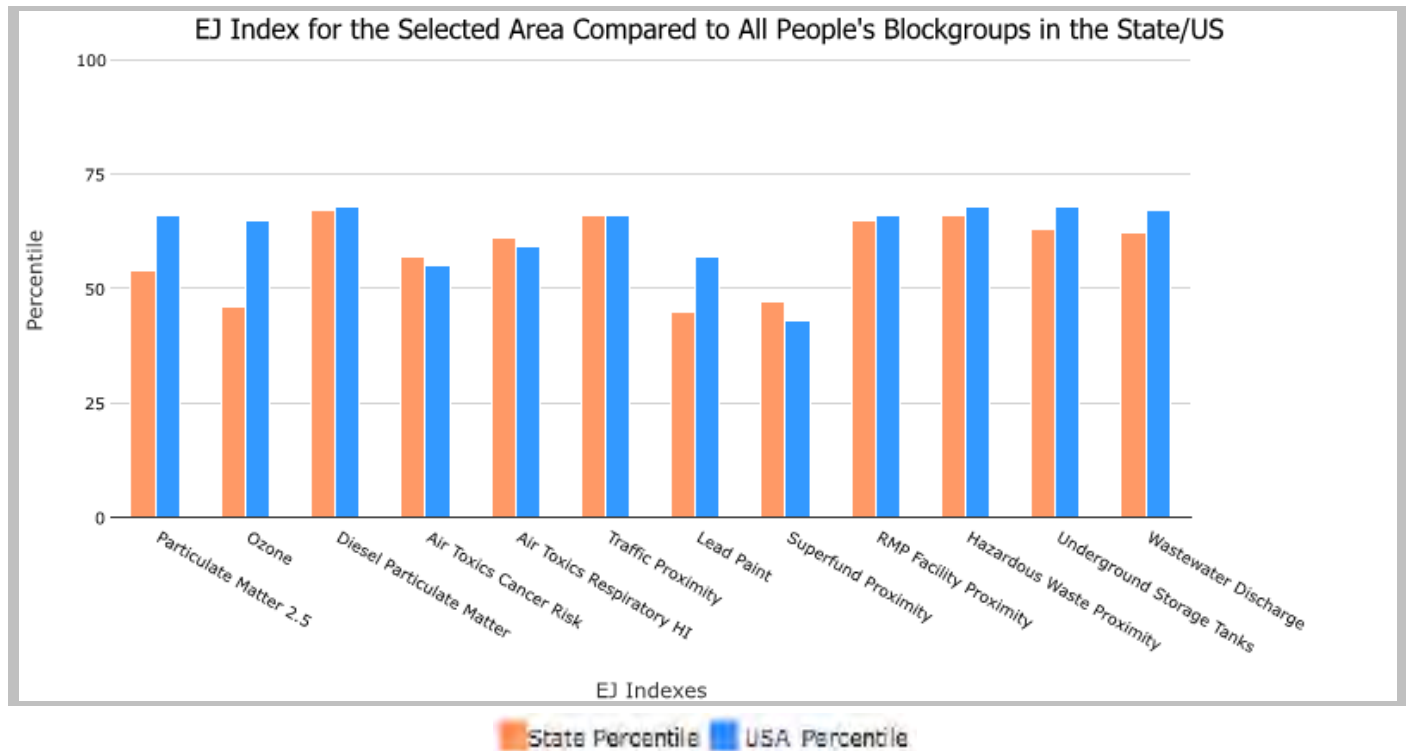


Blockgroup: 170313204001, ILLINOIS, EPA Region 5

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.

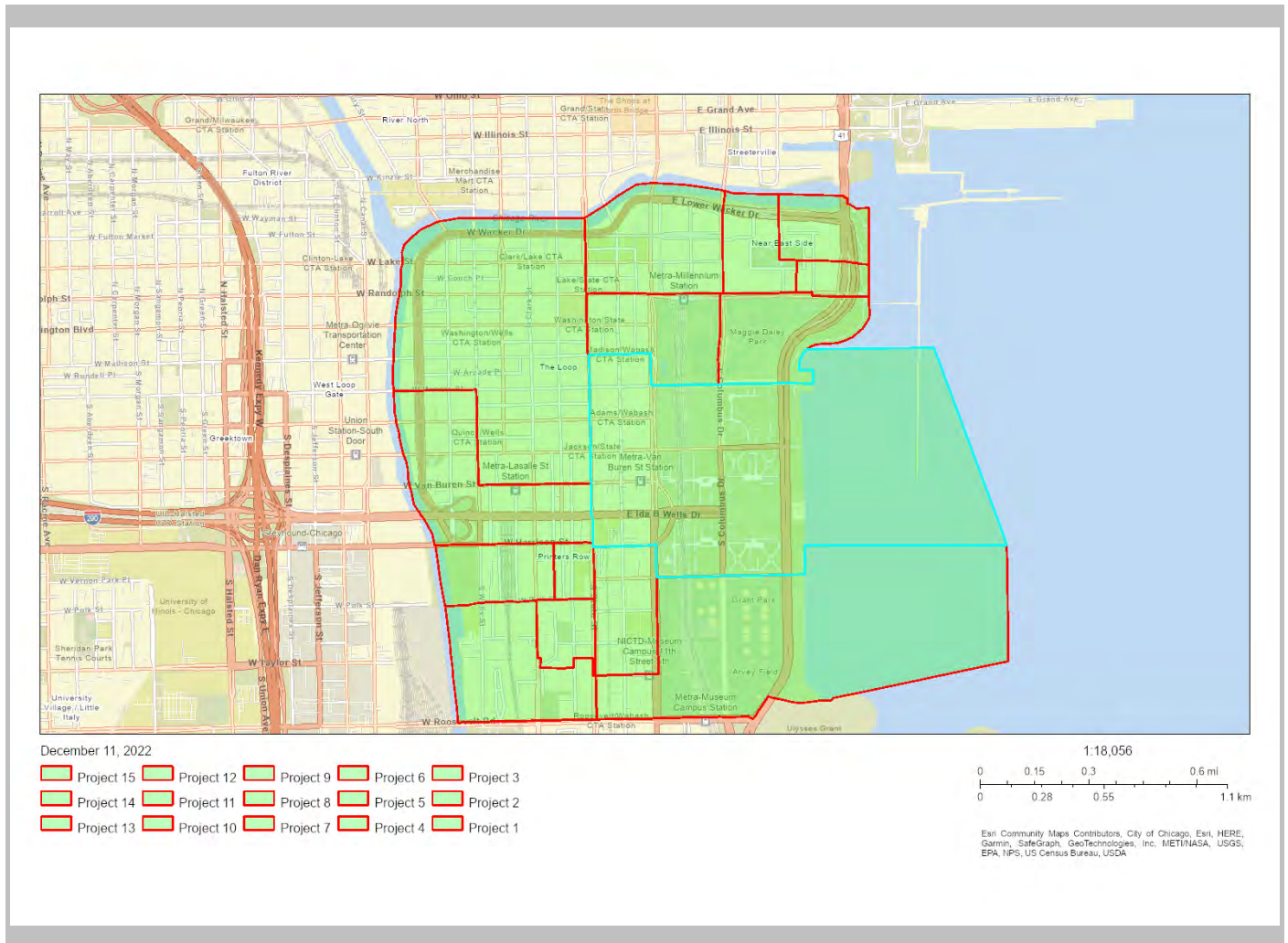
EJScreen Report (Version 2.1)



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>.

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EJScreen Report (Version 2.1)

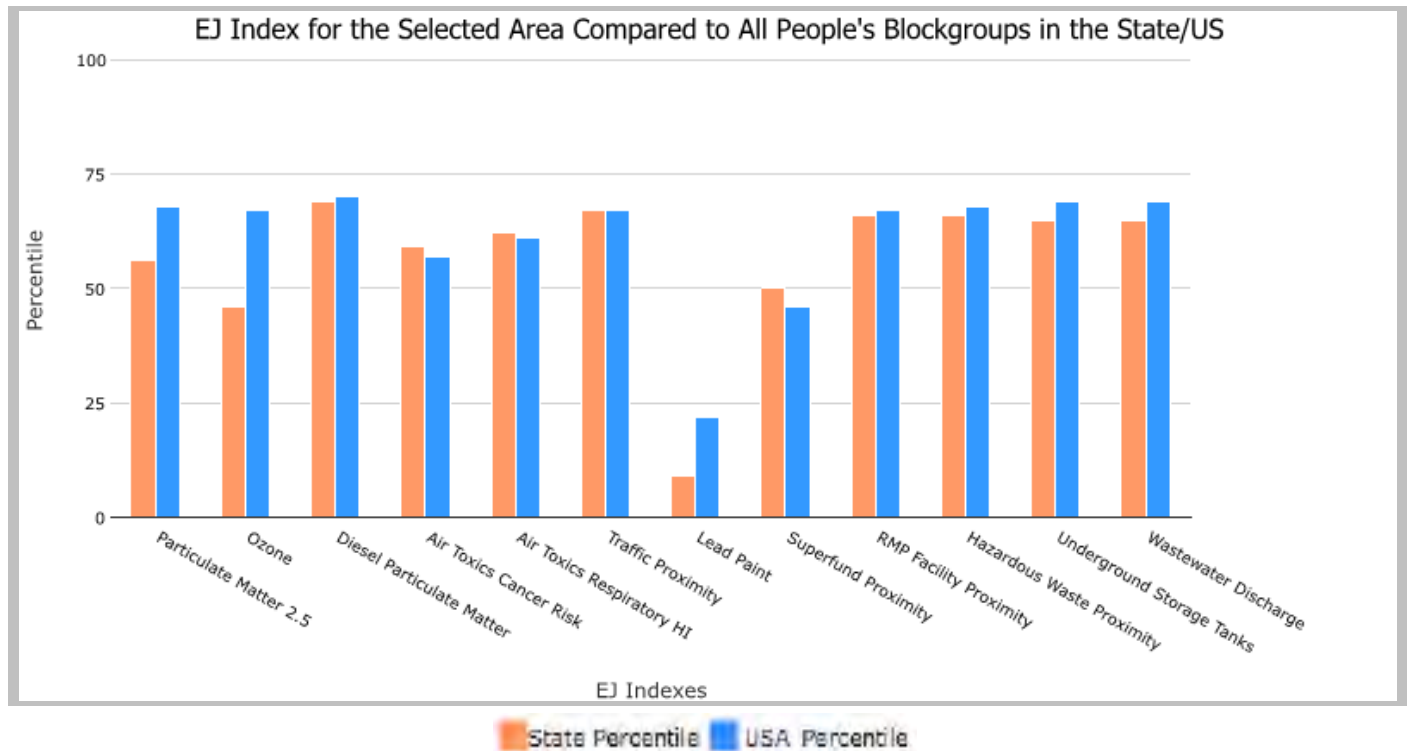


Blockgroup: 170313206001, ILLINOIS, EPA Region 5

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 |



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.

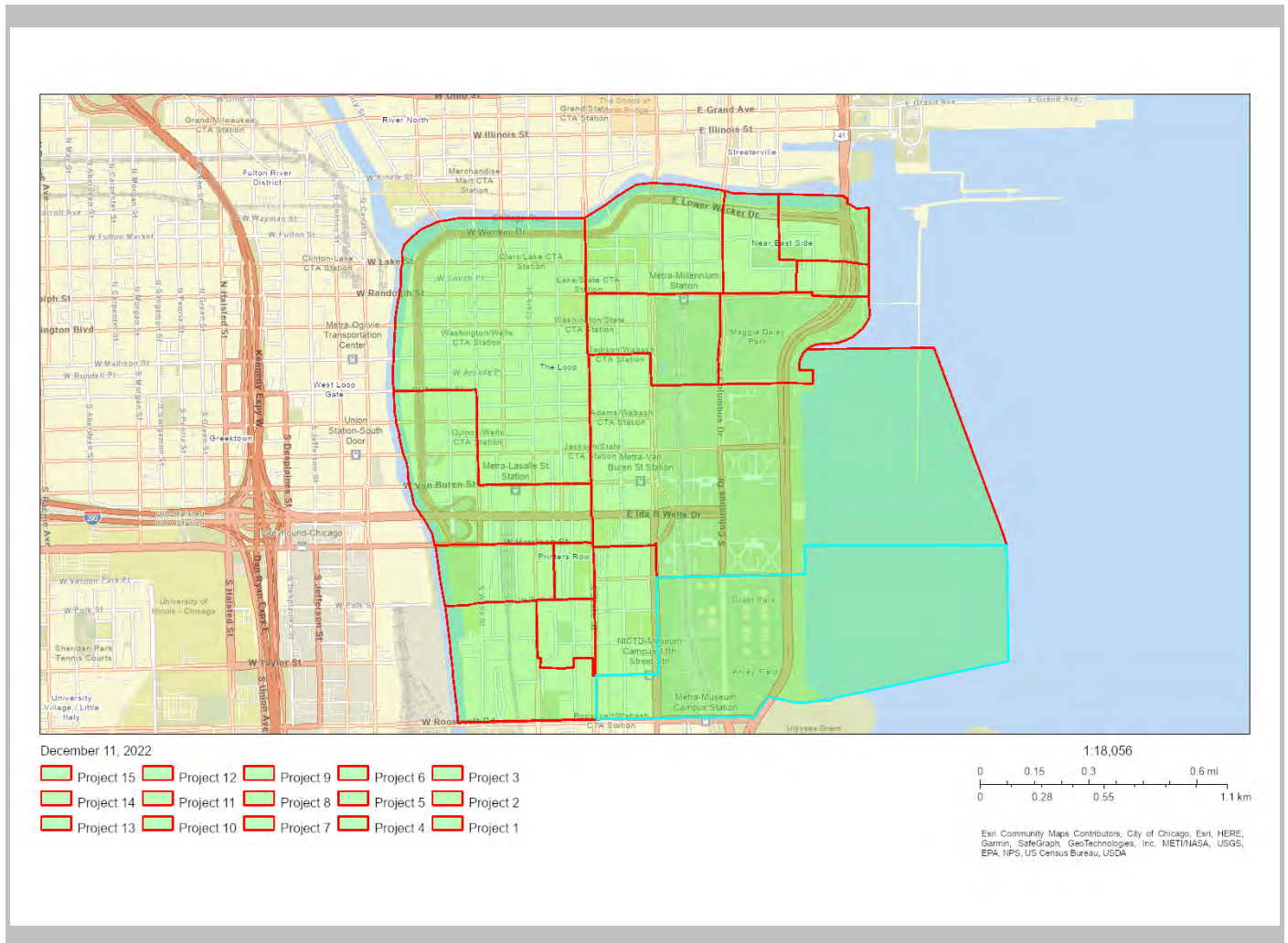
EJScreen Report (Version 2.1)



Blockgroup: 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)

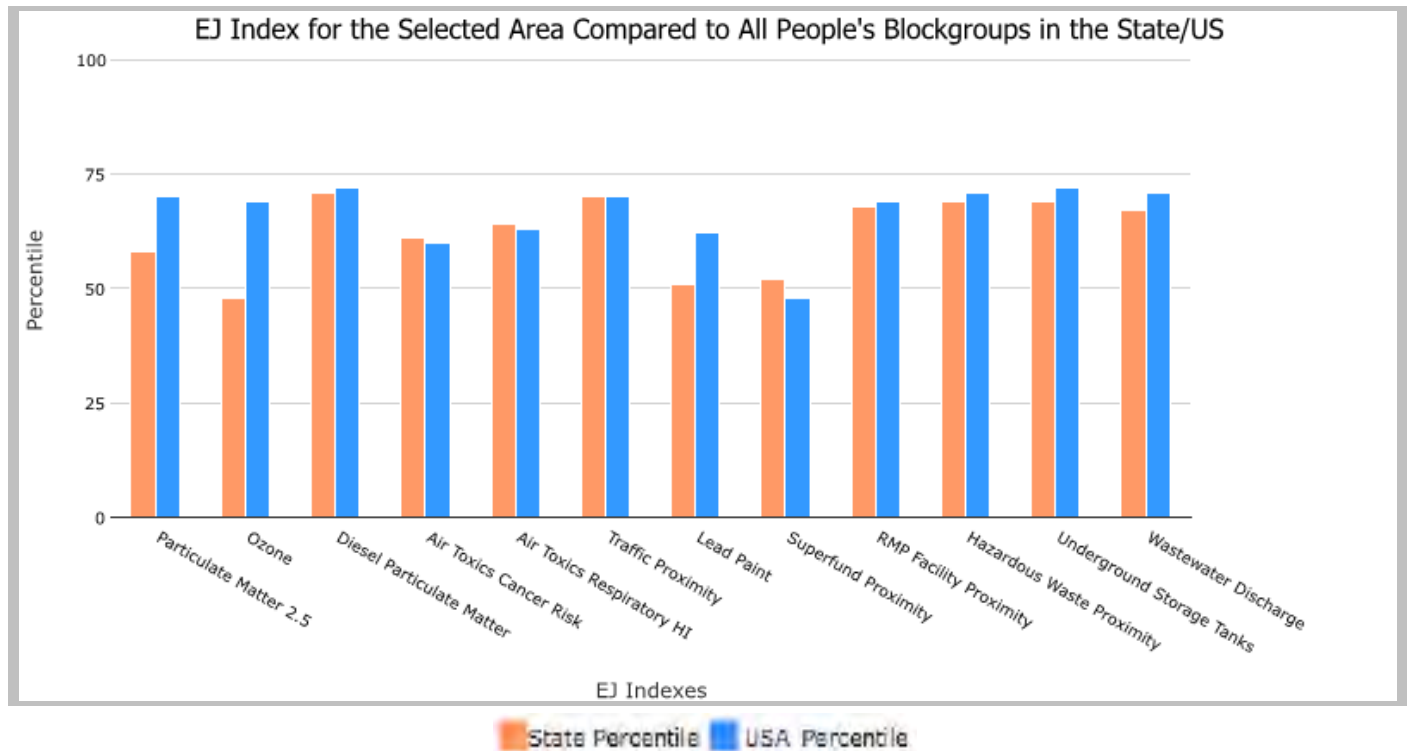


Blockgroup: 170313206002, ILLINOIS, EPA Region 5

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 |



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.

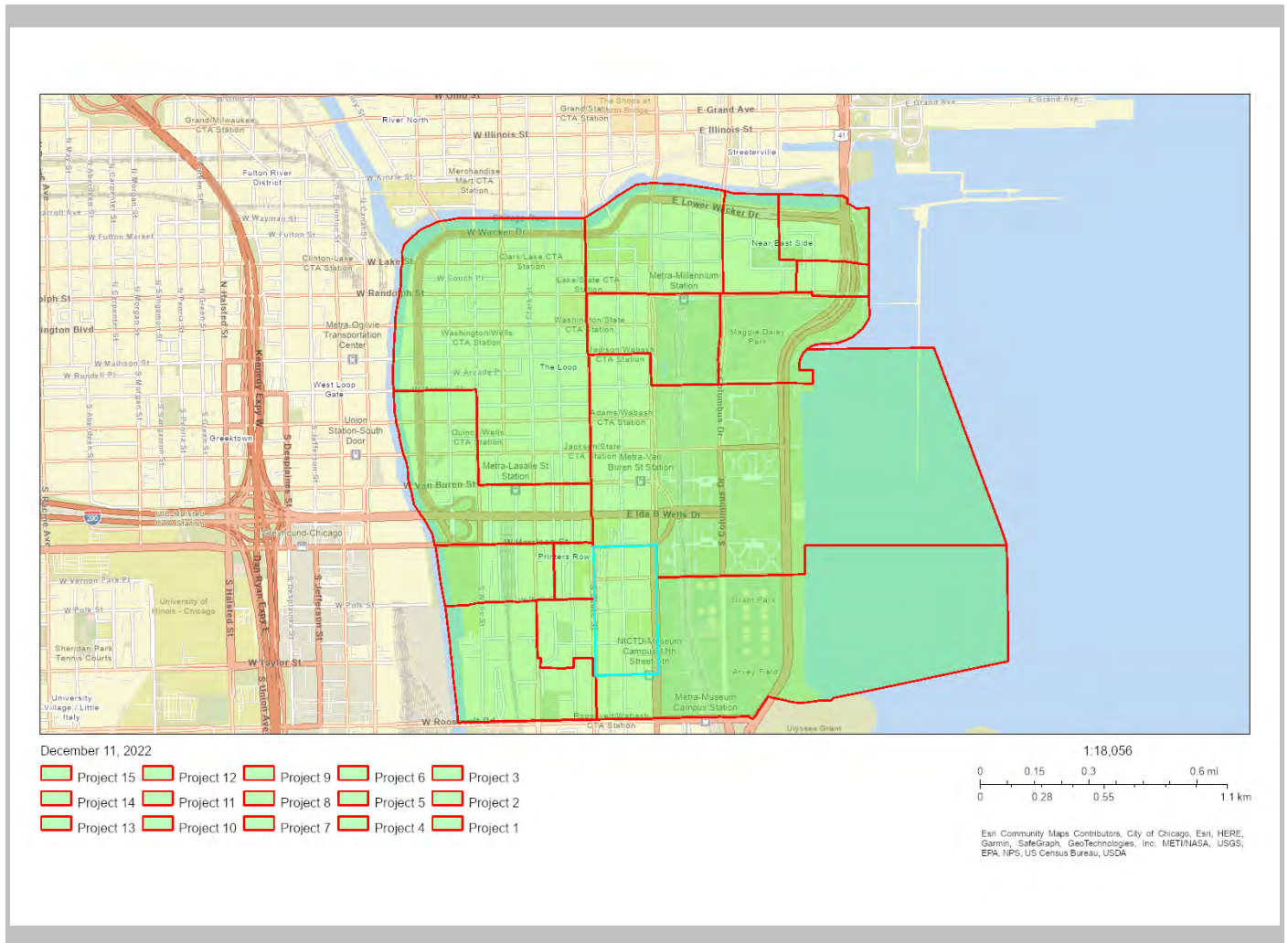
EJScreen Report (Version 2.1)



Blockgroup: 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 particular 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)

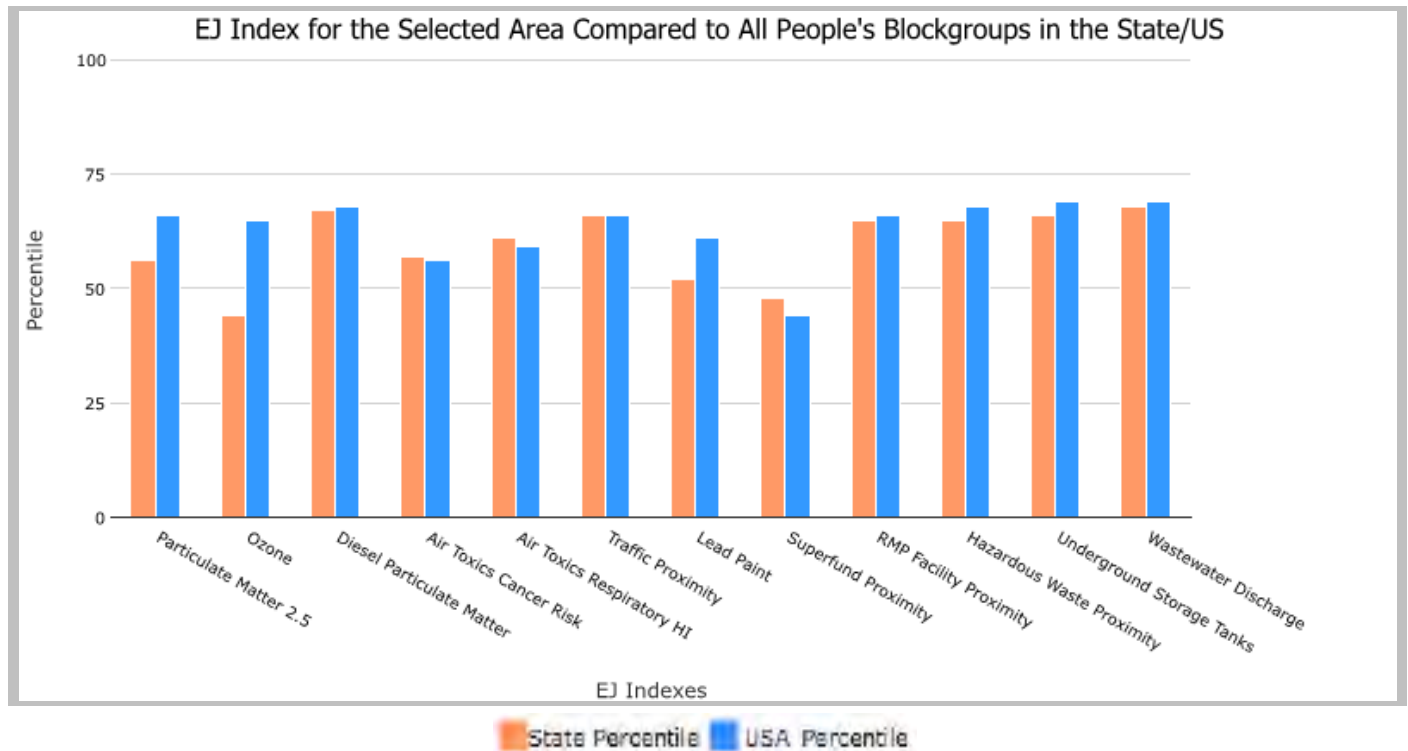


Blockgroup: 170318390001, ILLINOIS, EPA Region 5

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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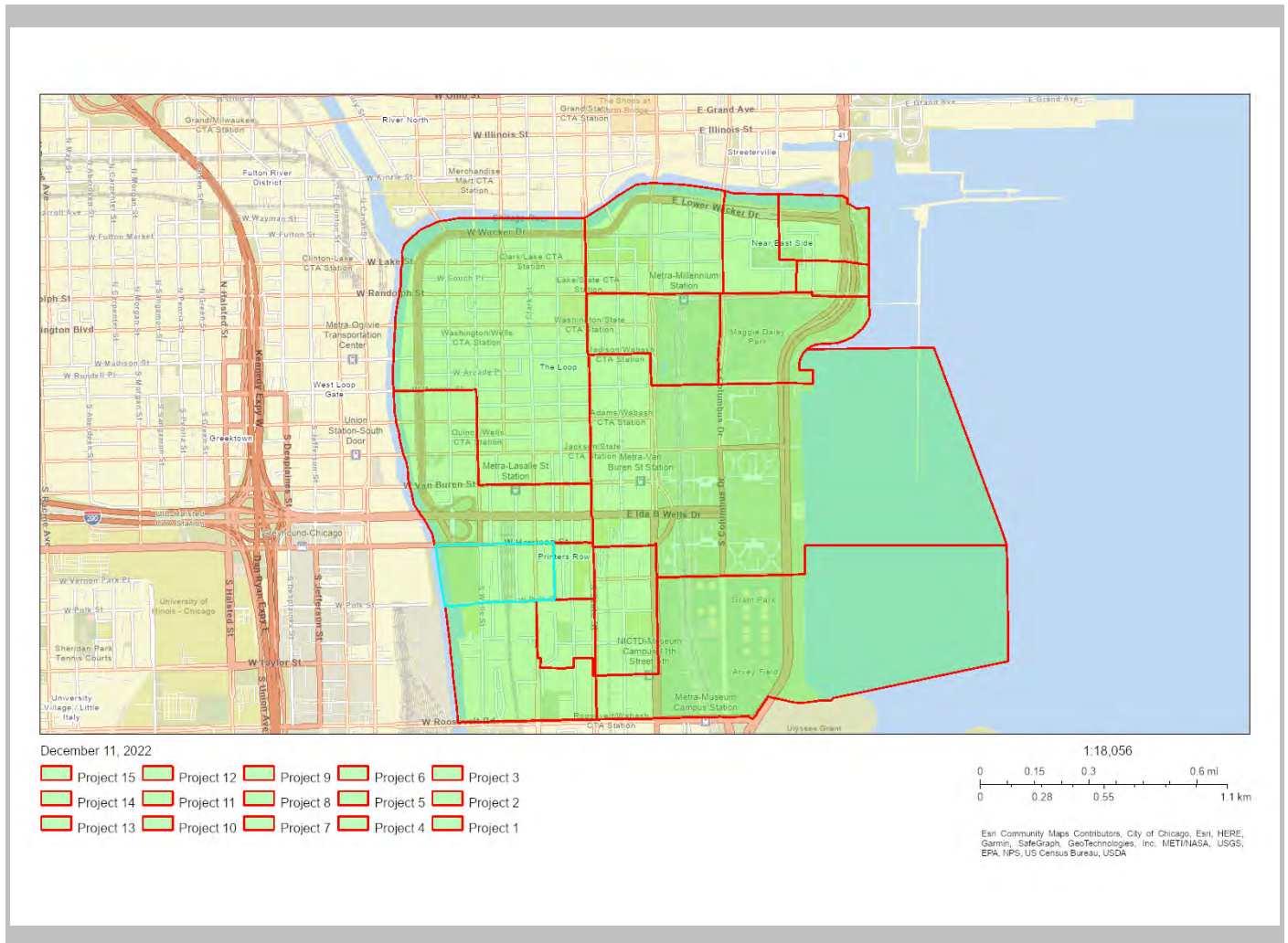
EJScreen Report (Version 2.1)



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)

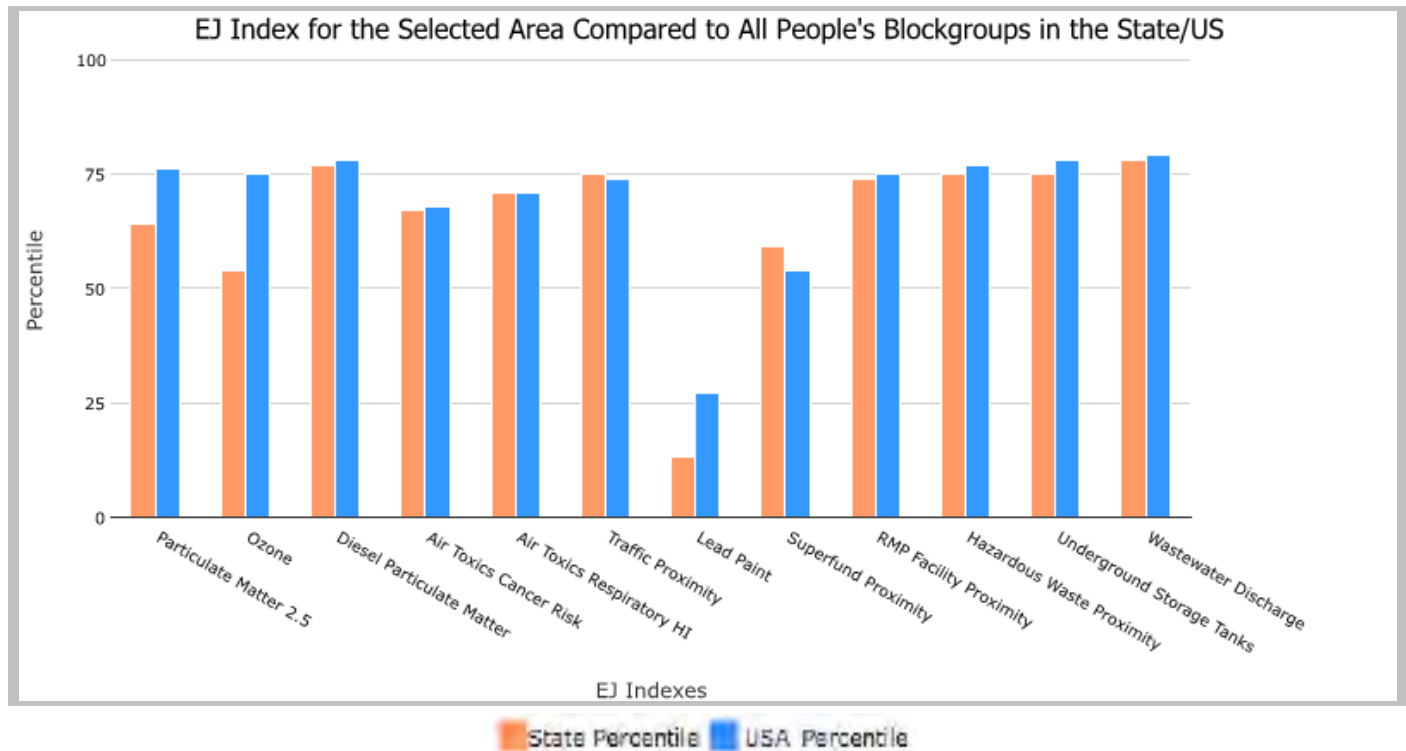


Blockgroup: 170318390002, ILLINOIS, EPA Region 5

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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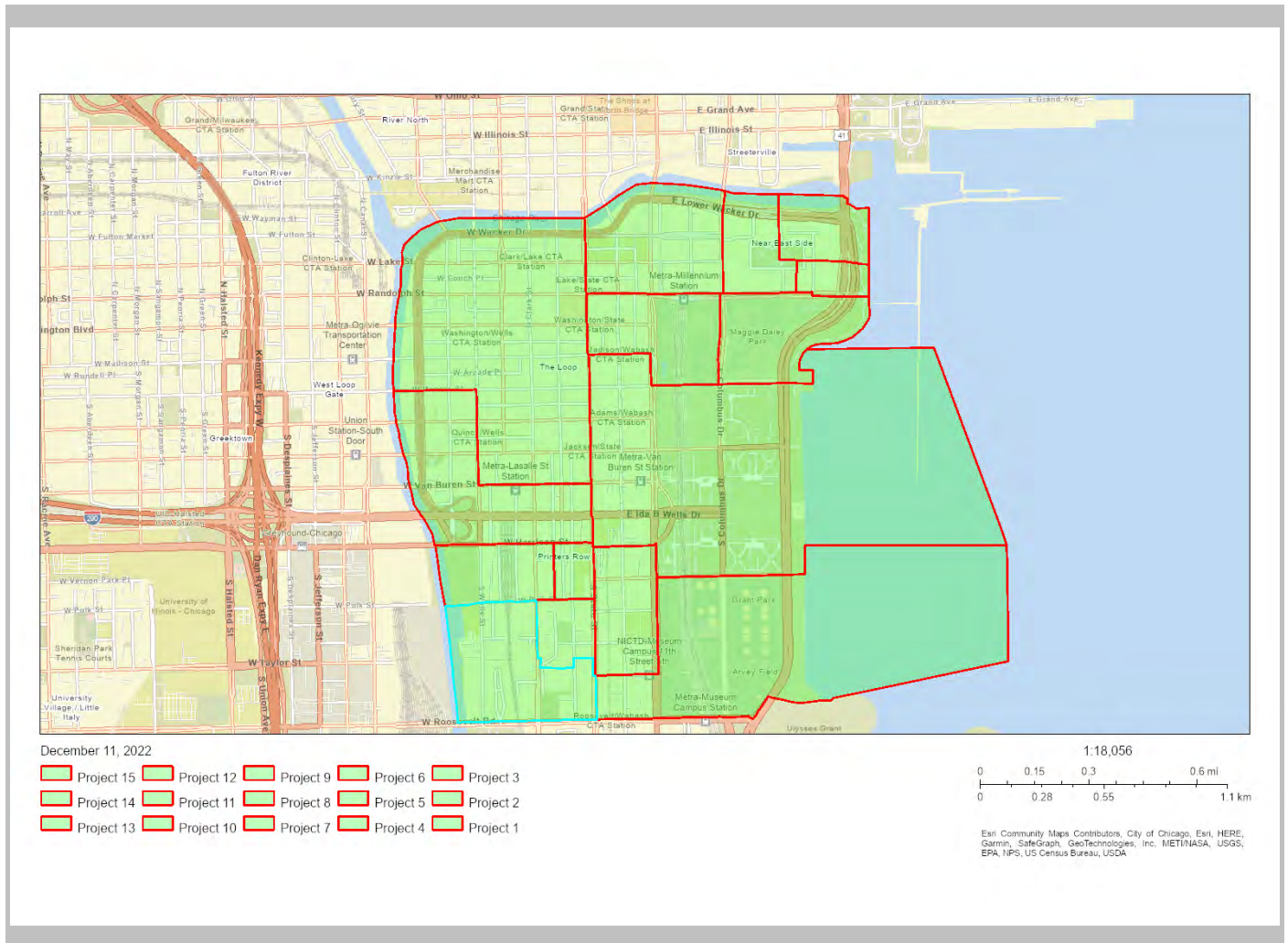
EJScreen Report (Version 2.1)



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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EJScreen Report (Version 2.1)

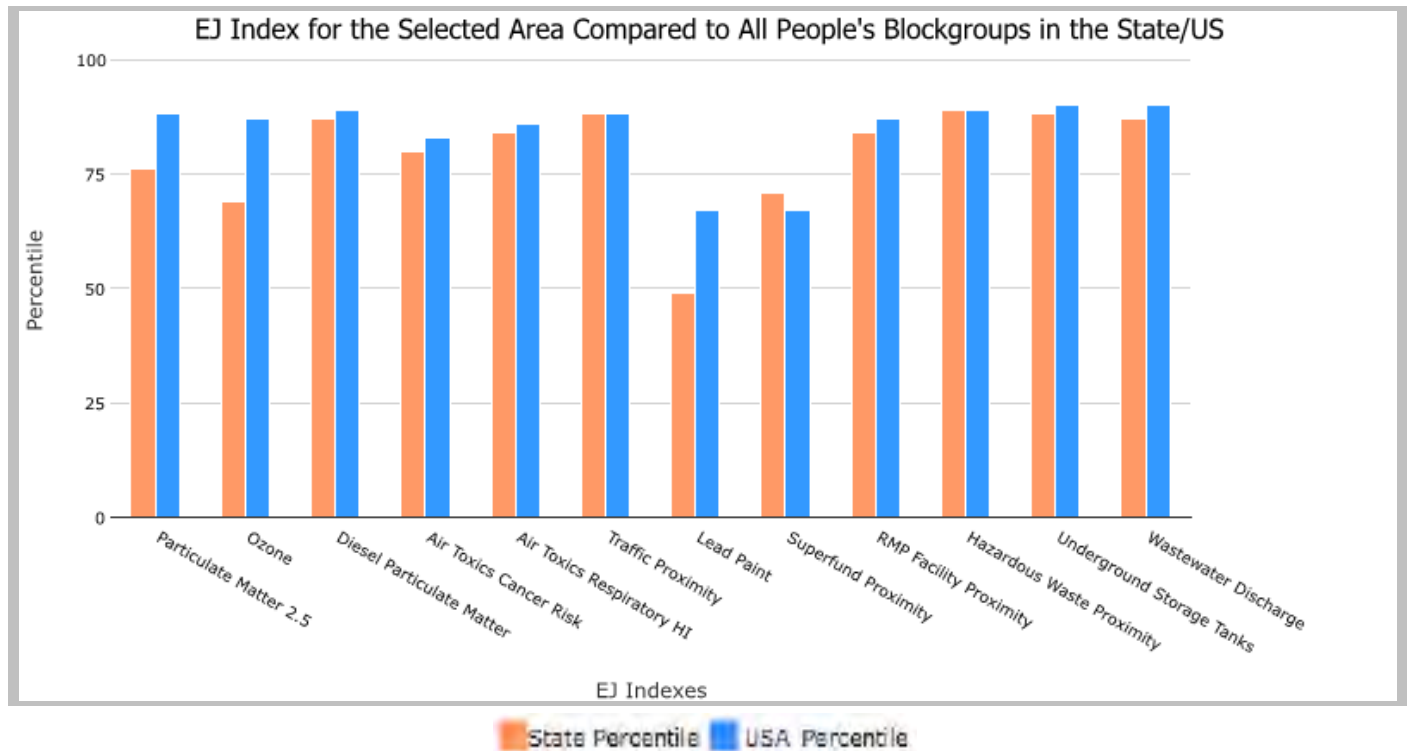


Blockgroup: 170318390003, ILLINOIS, EPA Region 5

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.

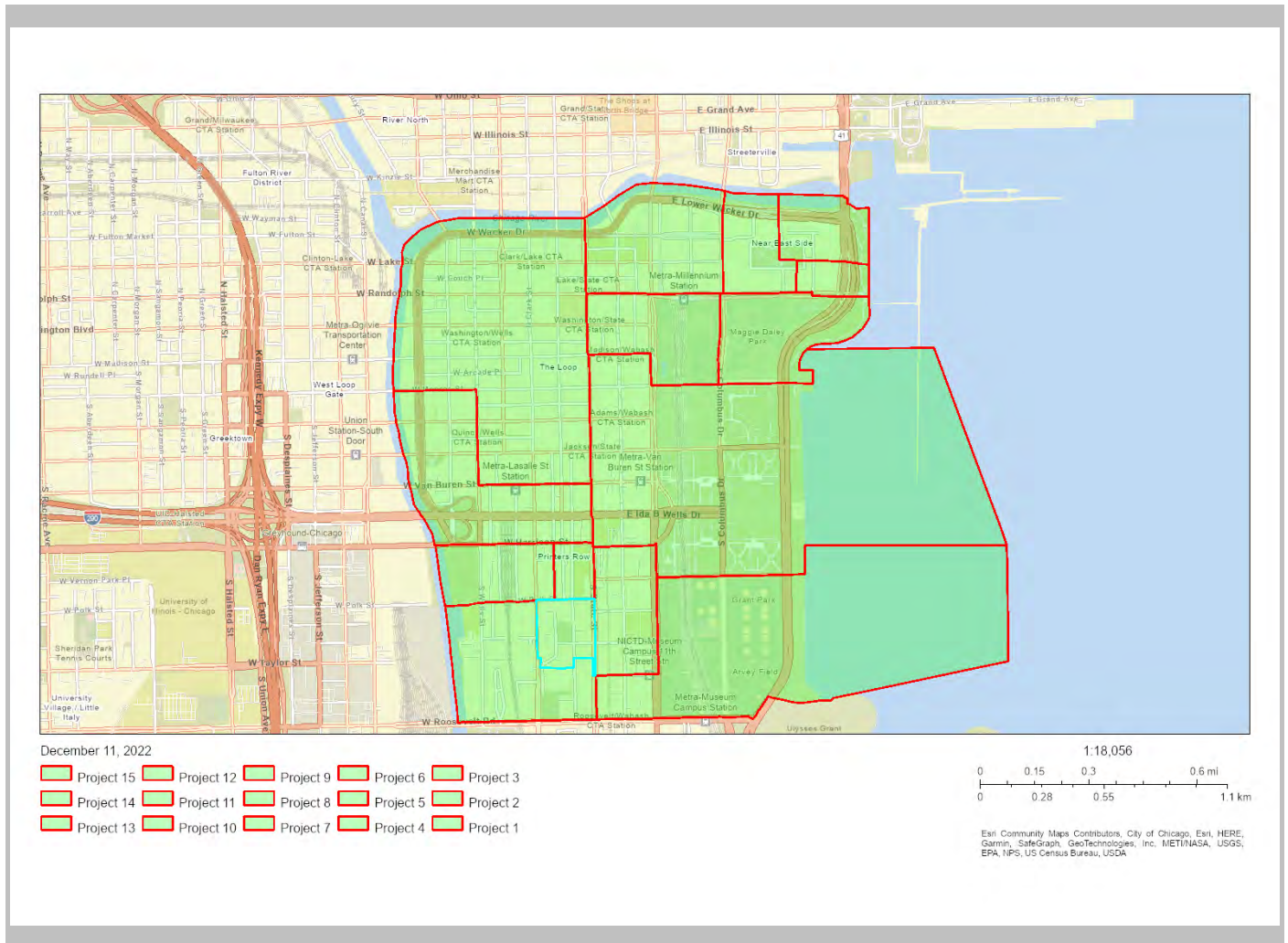
EJScreen Report (Version 2.1)



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>.

For additional information, see: www.epa.gov/environmentaljustice

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EJScreen Report (Version 2.1)

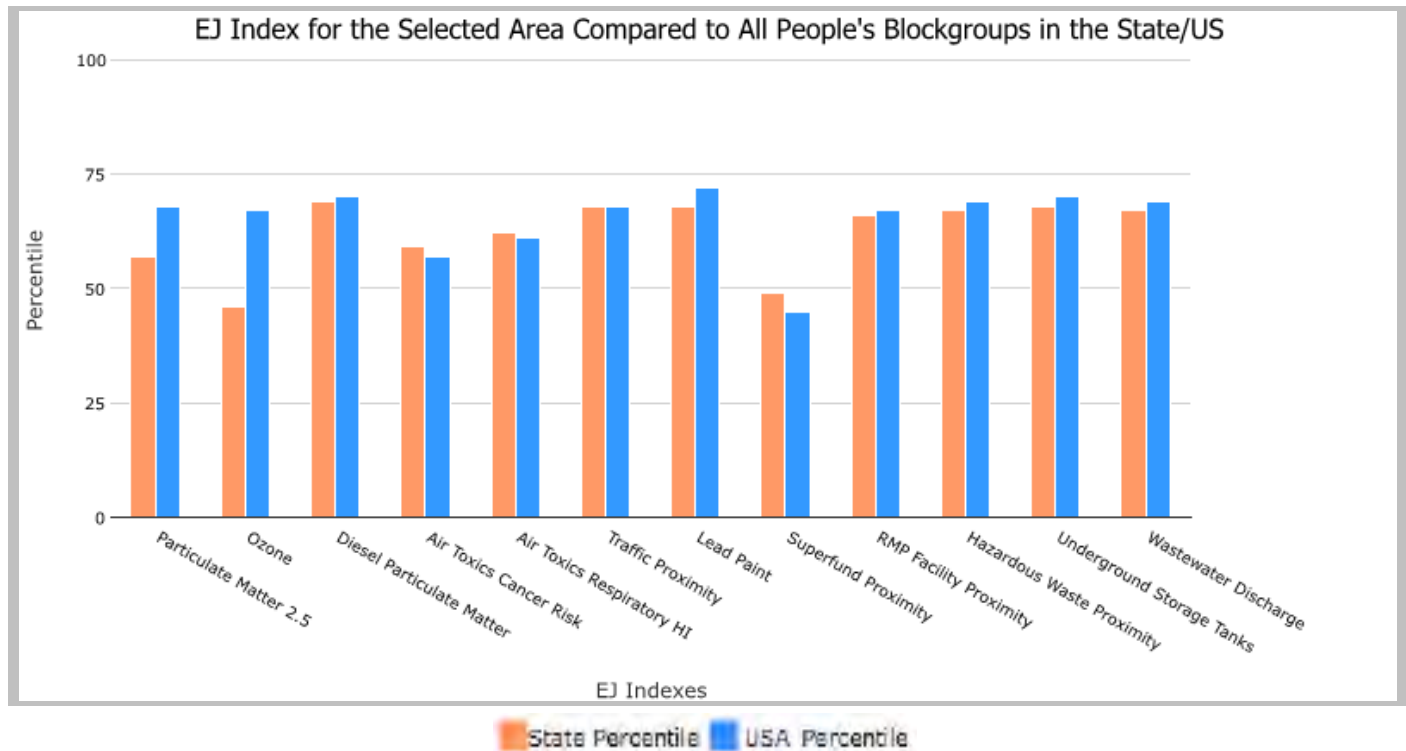


Blockgroup: 170318390004, ILLINOIS, EPA Region 5

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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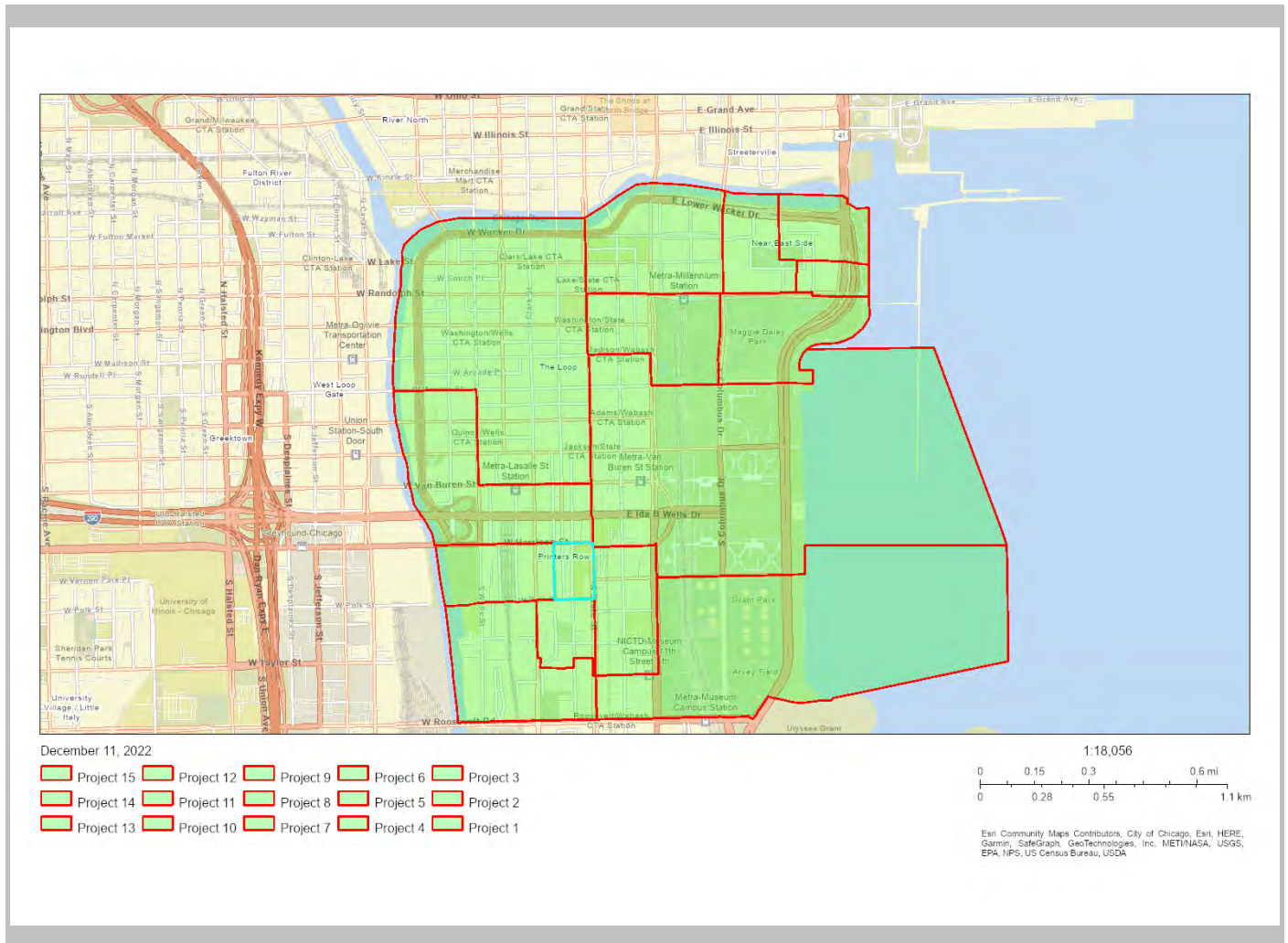
EJScreen Report (Version 2.1)



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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EJScreen Report

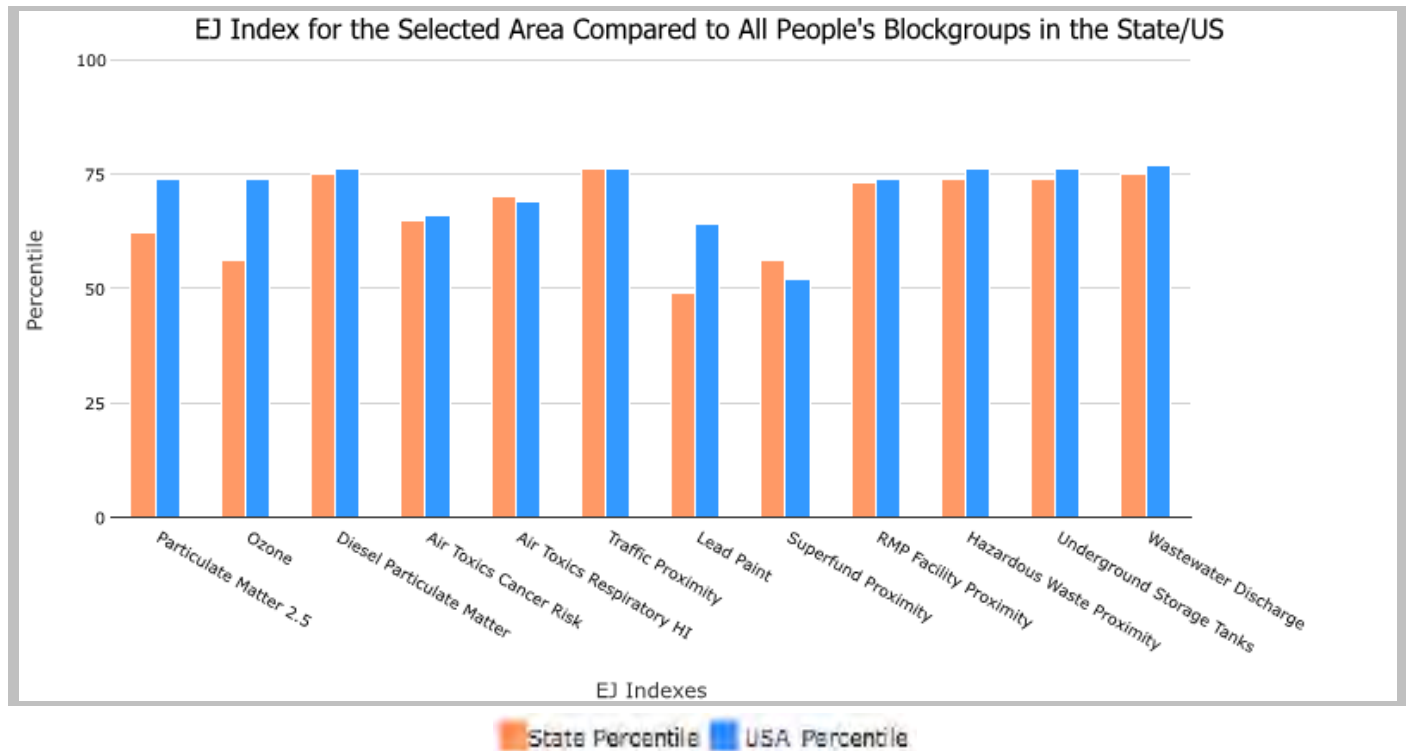


Blockgroup: 170318391002, ILLINOIS, EPA Region 5

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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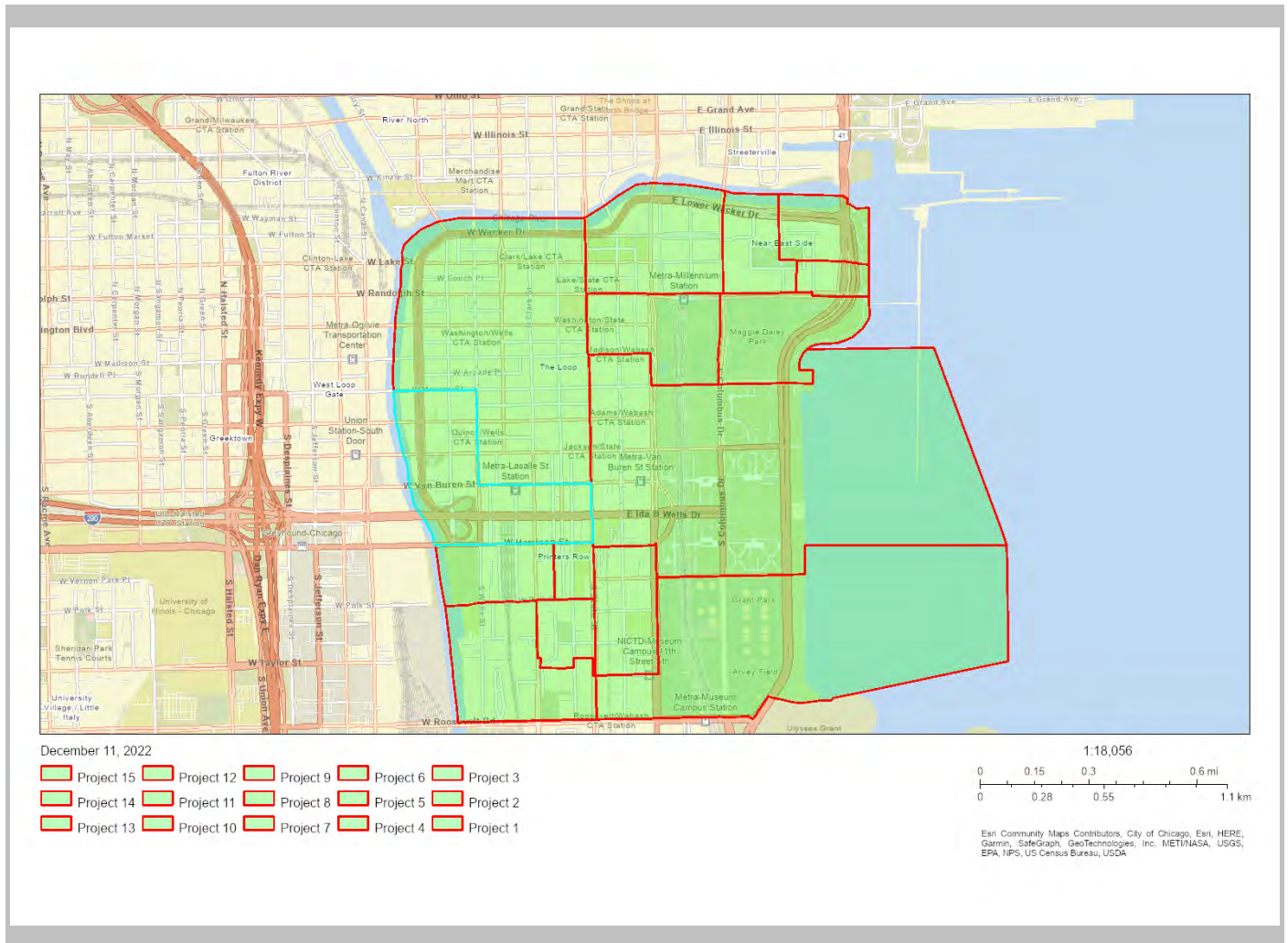
EJScreen Report (Version 2.1)



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>.

For additional information, see: www.epa.gov/environmentaljustice

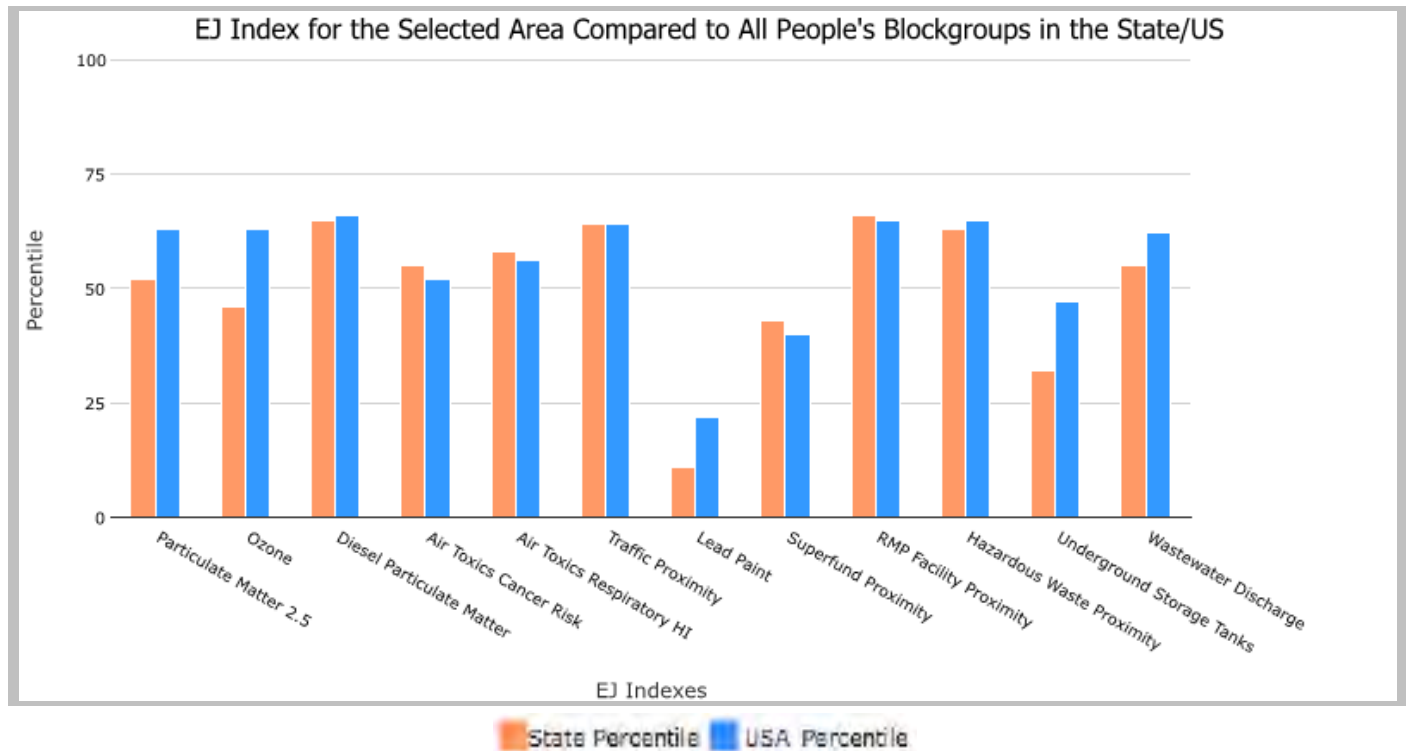
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EJScreen Report (Version 2.1)



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 |



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.

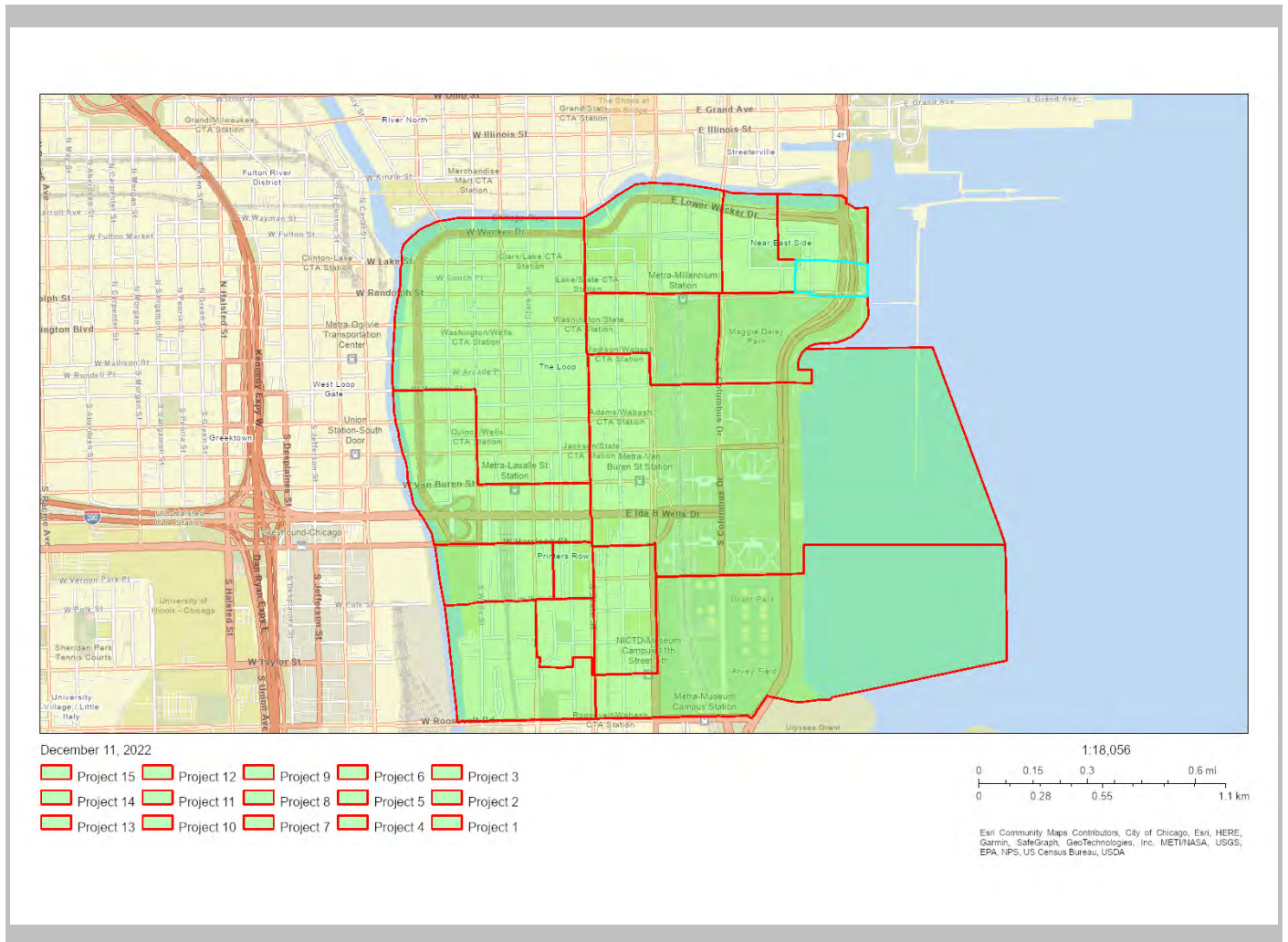
EJScreen Report (Version 2.1)



Blockgroup: 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>.

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Appendix F

Socioeconomics Report

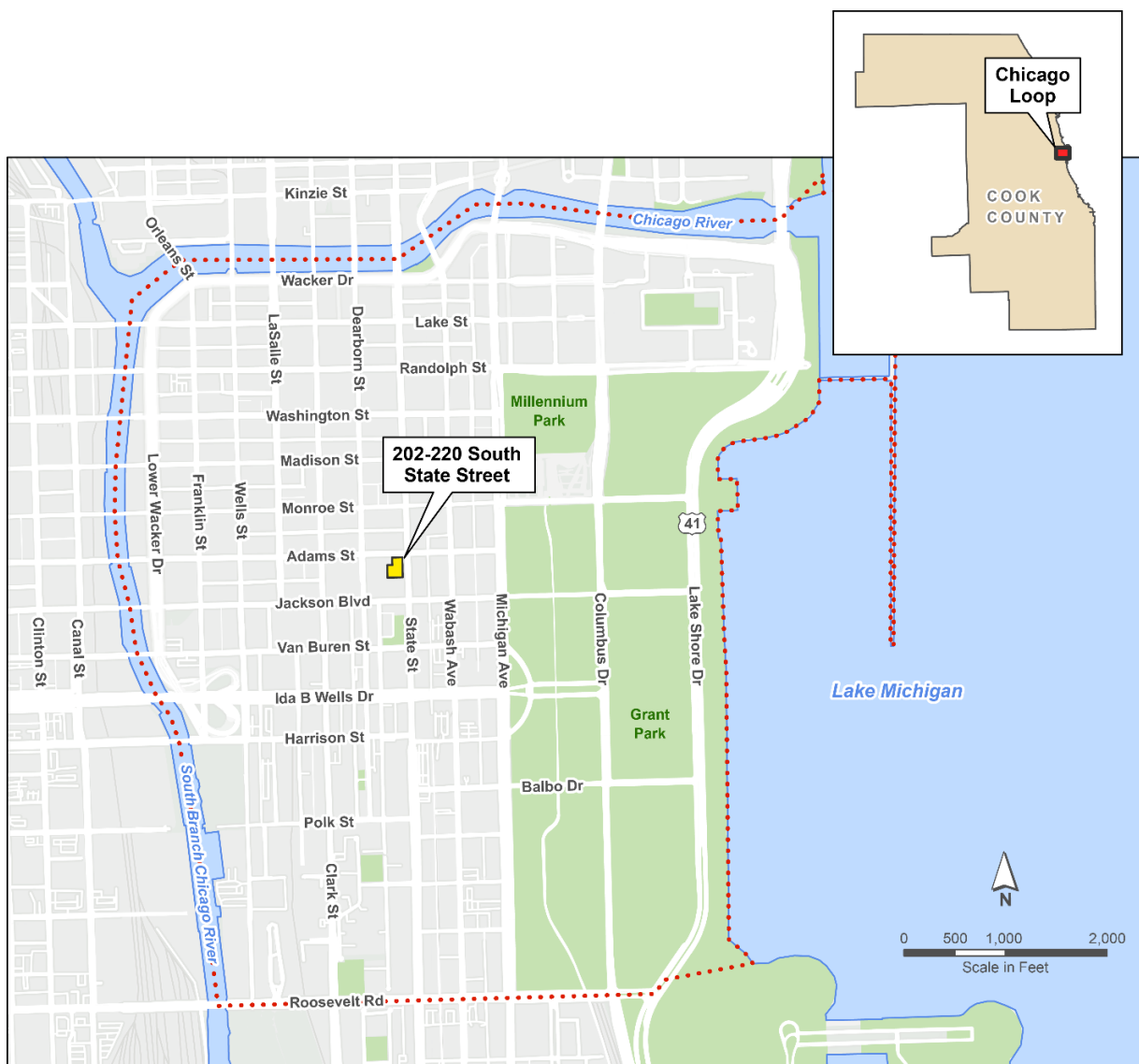
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Socioeconomic and Fiscal Impact Assessment Report

F.1. Introduction

This report describes the socioeconomic conditions in Cook County and Chicago's central business district, 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.

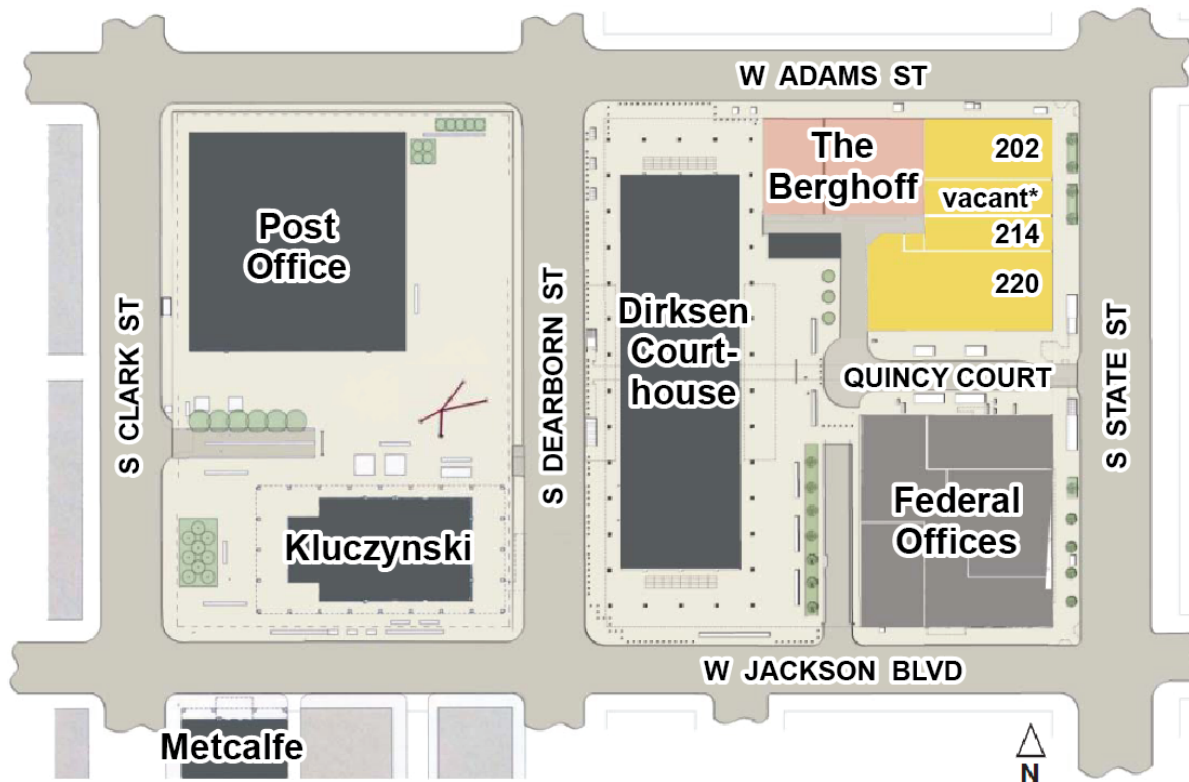
Figure F-1. Location Map



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 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 entered into a memorandum of understanding that was necessary to convey the right-of-way of Quincy Court to GSA, 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 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, Demolition) and the construction related to the adaptive reuse of the buildings (Alternative B, Viable Adaptive Reuse). 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).

In the Chicago Loop, 8.4 percent of the population has a household income less than \$25,000, whereas 35.6 percent (the largest group) has a household income of \$150,000 or more (Table F-10). 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.).

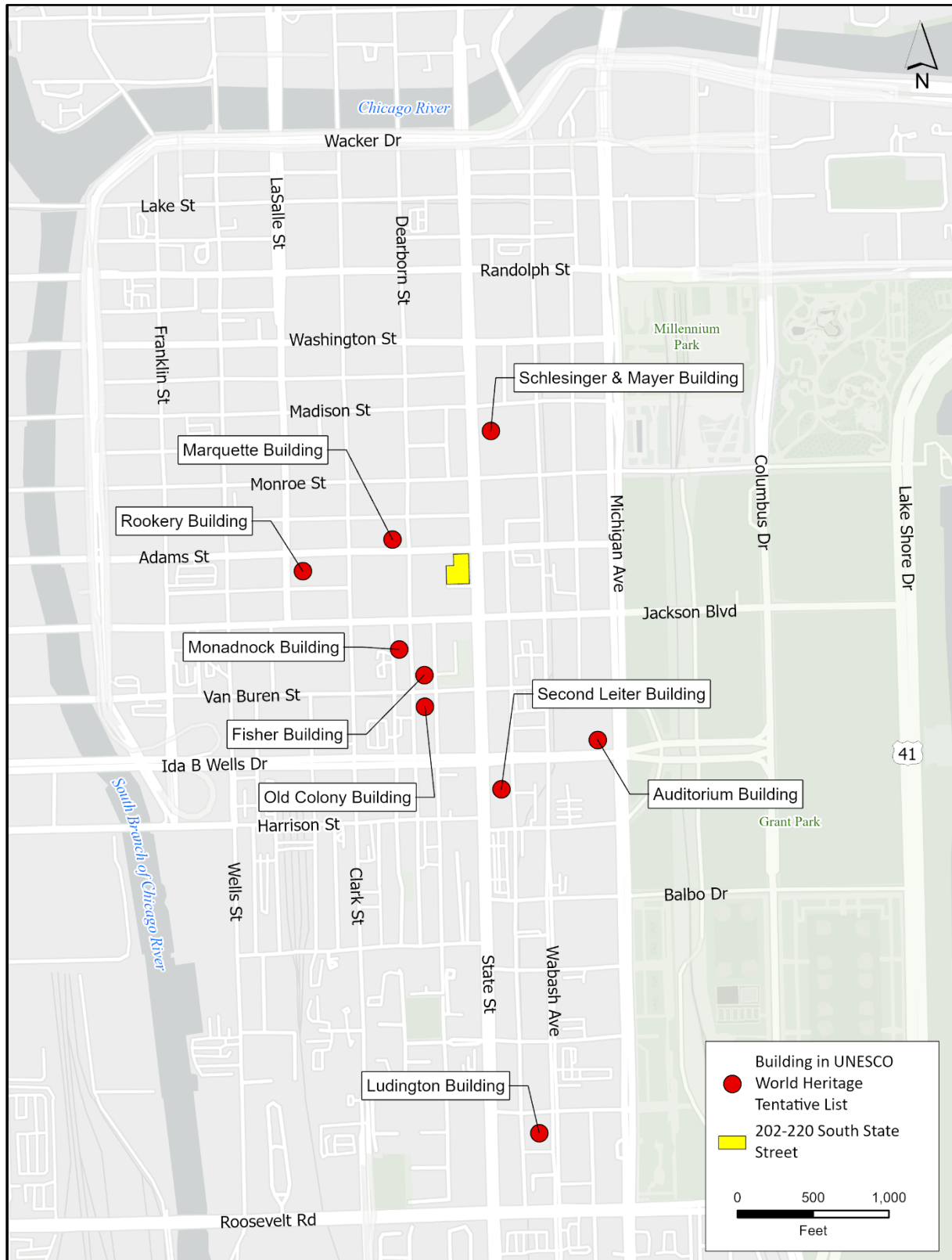
In the U.S., 78 percent of all leisure travelers participate in cultural and/or heritage activities while traveling, equating to about 118.3 million adults each year. With cultural and heritage travelers spending an average of \$994 per trip, they contribute more than \$192 billion annually to the national economy (McCormick 2010).

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).

In 2017, a preliminary group of nine primarily commercial buildings in the Chicago Loop were submitted by the U.S. Department of the Interior to the UNESCO World Heritage Centre Tentative List. This means that the proposal is potentially eligible for future nomination by the U.S. Department of the Interior for UNESCO consideration. Concerns about this project’s effect on a

potential future nomination were raised during public scoping meetings. These nine buildings exemplify the first generation of skyscrapers and new technologies of the time, particularly the use of internal metal structural systems instead of load-bearing masonry walls. The buildings rose to heights of nearly 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, 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 (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 Tentative List



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 the Demolition Alternative. 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). The Demolition Alternative 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. Demolition Alternative 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 the Demolition Alternative 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, the Demolition Alternative 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 the Demolition Alternative, 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 National Register of Historic Places before the Loop Retail Historic District was added to the National Register 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 National Register-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, the Demolition Alternative 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 a UNESCO World Heritage Site nomination. Although the Century Building and Consumers Building (202 and 220 South State Street, respectively) are examples of Chicago's early skyscrapers, they are not among the nine buildings included in the U.S. Department of the Interior's proposal to the UNESCO World Heritage Center Tentative List. Significant cultural character would remain in the Chicago Loop even if the Century Building and Consumers Building were demolished. Therefore, it is unclear at this time if removing the buildings at 202, 214, and 220 South State Street would affect a potential future nomination for UNESCO designation, which could increase heritage tourism in Chicago.

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

The Viable Adaptive Reuse Alternative would involve first 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 security criteria. GSA would consider proposals with proposed deviations from the viable adaptive reuse security criteria that demonstrate the financial capability of the offeror to successfully execute. Any proposed deviation must be agreed to by GSA. There are no federal funds available for reuse or proposed deviations from the security criteria. 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 security criteria would not be performed at the federal government's expense.

The Viable Adaptive Reuse Alternative 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 viable 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. The Viable Adaptive Reuse Alternative'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 the Viable Adaptive Reuse Alternative 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 the Viable Adaptive Reuse Alternative. 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. Assuming a longer (54-month or 4.5-year) construction period, there would be a total increase of approximately \$174 to \$196 million in total labor income and \$600 to \$675 million in total industry output over the 4.5 years.

Table F-17. Viable Adaptive Reuse Alternative 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 the Viable Adaptive Reuse Alternative 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 the Viable Adaptive Reuse Alternative 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 the Viable Adaptive Reuse Alternative 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 the Viable Adaptive Reuse Alternative 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 the Demolition Alternative.

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 (Jones Long LaSalle 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.

The Viable Adaptive Reuse Alternative 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.

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Appendix G

Greenhouse Gas Emissions

Quantification Methodology

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Table G-1: Quantification methodologies and emission factors applied for each emissions source

| Source Type | Emission Source | Quantification Methodology | Emission Factors Applied |
|--|--|---|--|
| Direct Emissions (Scope 1) | Fuel Combustion | Equipment fuel usage is estimated based on the anticipated equipment needed for construction activities through the demolition and adaptive reuse processes. Duration of activities and equipment needed were determined based on discussion with construction management subject matter experts and consistency with the cost analysis. Fuel consumption rates for equipment types were procured from publicly available and manufacturer-specific technical information. Equipment was anticipated to operate eight hours per day for the duration of the construction activity. | Combustion emission factors for diesel and gasoline are sourced from the EPA Emission Factor Hub (March 2023). Acetylene emission factors are sourced from The Climate Registry Default Emission Factors (2022). |
| Direct Emissions (Scope 1) | Fuel Combustion (Office) | For the adaptive reuse scenario, natural gas heating is expected for the lifetime operations of the buildings, calculated until 2050. Consumption is estimated using the EIA CBECS 2018 (Table C20, warehouse/storage) natural gas use intensity factors that are specific to the region/climate zone and type of building use multiplied by the building's square footage. | Energy intensity factors are sourced from CBECS 2018 energy intensity Table C30, and emission factors are sourced the EPA Emission Factor Hub (March 2023). |
| Indirect Emissions – Electricity (Scope 2) | Electricity Consumption (Construction) | Equipment electricity usage is estimated based on the anticipated equipment needed for construction activities throughout the demolition and adaptive reuse processes. Duration of activities and equipment needed were determined based on discussion with construction management subject matter experts and consistent with the cost analysis. Electricity consumption rates for equipment types were procured from publicly available and manufacturer specific technical information. Equipment is anticipated to operate eight hours per day for the duration of the construction activity. For construction trailers, electricity consumption is estimated using the EIA CBECS 2018 electricity use intensity factors multiplied by the trailer's square footage. | CBECS 2018 energy intensity Table C20. Electricity emission factors are sourced from EPA eGRID 2021 Summary Table 1. |

Greenhouse Gas Emissions Quantification Methodology

| Source Type | Emission Source | Quantification Methodology | Emission Factors Applied |
|--|--|---|---|
| Indirect Emissions – Electricity (Scope 2) | Electricity Consumption (New Space) | For the adaptive reuse scenario, electricity usage in the buildings is estimated using electricity intensity values from EIA CBECS 2018 that are specific to the region/climate zone and type of building use multiplied by the building’s square footage. It was assumed that the buildings will not be used as a standard office (due to security limitations), but rather used for storage or commercial use. That electricity use is calculated for the lifetime operations, until 2050. The electricity grid is expected to continually decarbonize and a conservative decarbonization rate of 1% was applied for each year of use. | CBECS 2018 Warehouse and Storage (cold/very cold) electricity intensity Table C20. Electricity emission factors are sourced from EPA eGRID 2021 Summary, Table 1. |
| Upstream – Indirect (Scope 3) | Materials for backfill, grading, paving, landscaping, interior construction, and rebuild | Materials-related emissions are estimated based on discussion with construction management subject matter experts and consistent with the cost analysis. Using subject matter expert inputs, materials volume for top down demolition is estimated based on building dimensions and best practice and multiplied by the embodied carbon emission intensities from the ICE database. For the adaptive reuse scenario, embodied carbon estimates were developed using the Carbon Avoided: Retrofit Estimator tool. Key assumptions include: <ul style="list-style-type: none"> - 100% replacement of MEP equipment - Full reconfiguration and rebuild of interior walls - Minor window glazing - Minor repairs to the roof - Full replacement of interior finishes | For demolition scenario embodied carbon emission intensities are sourced from ICE V3 (10 Nov 2019). For adaptive reuse scenario, the Carbon Avoided Retrofit Estimator Tool was used. |
| Upstream – Indirect (Scope 3) | Upstream Fuel and Energy Related Activities | Upstream fuel and electricity emissions are calculated based on the well-to-tank emissions factors for all fuel and electricity used during demolition, remodeling, or use of the buildings. As the emissions factors are only available in CO ₂ e, the calculations assume that all emissions from well-to-tank activities are CO ₂ emissions. | Well to tank emission factors are sourced from DEFRA 2022 conversion factors. |
| Upstream – Indirect (Scope 3) | Transmission and Distribution Losses | Transmission and distribution losses are calculated as a percentage of total electricity used and are estimated as 4.5% grid gross loss. Electricity T&D emissions are calculated based on the kWhs worth of grid gross loss and eGRID emissions factors. | Electricity emission factors are sourced from EPA eGRID 2021 Summary, Table 1. Grid Gross Loss is sourced from eGRID 2021 Technical Guide, Table 3.6. |
| Upstream – Indirect (Scope 3) | Employee Commuting | Commuting emissions from demolition worker commutes is based on discussion with construction management subject matter experts and is consistent with the cost analysis. Those inputs serve as the basis to calculate the commuting days in each year of the demolition, assuming an average commute of 18.4 miles based on the Chicago Metropolitan Agency for Planning statistics . The fractions of private vehicle commute to mass transit and carpooling are based on the statistics available from Chicago Active Transportation Alliance and discussion | Commuting emissions factors are sourced from EPA Emission Factor Hub (March 2023) (2020 model light-duty truck). |

Greenhouse Gas Emissions Quantification Methodology

| Source Type | Emission Source | Quantification Methodology | Emission Factors Applied |
|---------------------------------|-----------------|---|---|
| | | <p>with construction management teams. The product of the average commuting distance, fraction of mode of transportation, and total number of trips provides the total mileage by mode of transportation. Emissions are calculated by applying the corresponding emissions factors to the mileage by mode of transportation.</p> <p>For the adaptive re-use scenario, commuting emissions are estimated for the employees/maintenance staff. It was assumed that the buildings will not be used as a standard office (due to security limitations), but rather used for storage or commercial use. Based on that assumption, five people commuting to the building for 250 working days per year until 2050 is used to calculate commuting emissions.</p> | |
| Downstream – Indirect (Scope 3) | Waste Transport | <p>In both demolition and adaptive reuse scenarios, waste is being transported off site. The emissions from that transport are estimated based on discussion with construction management subject matter experts and consistent with the cost analysis. Based on the estimated weight of demolition waste, the number of truck loads is calculated assuming the use of 10-ton roll-off trucks. Assuming the debris is transported to JKS Ventures Inc (D&P Construction closest to the site), a roundtrip of 32 miles is assumed. The total distance of truck travel is the product of the number of trips and the average distance to waste disposal. Emissions factors for a diesel heavy-duty truck are applied on a per gallon or per mile basis.</p> <p>A similar approach is used for estimating the ongoing waste transport emissions from the buildings for adaptive reuse, assuming 250 working days per year worth of waste generated until 2050.</p> | EPA Emissions Factors Hub (March 2023) (2007-2020 model heavy-duty diesel truck) and Fuel Economy from FHWA Statistics. |

Greenhouse Gas Emissions Quantification Methodology

| Source Type | Emission Source | Quantification Methodology | Emission Factors Applied |
|---------------------------------|-----------------|--|--|
| Downstream – Indirect (Scope 3) | Waste Disposal | <p>The amount of waste is estimated based on discussion with construction management subject matter experts and consistent with the demolition and renovation assessment completed by Jacobs in December 2022. Ten percent by weight is assumed as recycled material, and consistent with the Greenhouse Gas protocol, emissions from the recycling process are outside the boundaries of this assessment (the emissions will be part of the material emissions for the recycled material). The remaining waste weight is used to estimate emissions based on the landfilling emissions factor for metal and drywall. The breakdown of the specific GHG gases is based on the literature averages of 55% by volume of methane and 45% by volume of CO₂. Using gas densities, the relative weight of each GHG was calculated.</p> <p>For the adaptive reuse scenario, the ongoing waste generation is estimated based on the commercial rate of waste generation (from Draft EIR for North Hills Development). Assuming 250 working days per year and building use up to 2050, the total waste weight is estimated and used to estimate emissions based on municipal solid waste and mixed recycling emission factors.</p> | EPA Emission Factors for Greenhouse Gas Inventories (March 2023), Table 9. Metals and drywall; EPA WARM model. |

Appendix H

Draft EIS Comments and Responses

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Table H-1. Individual Comments Received on the Draft EIS and GSA Responses

| Comment Number | Name | Group | Organization/ Affiliation | Comment/Inquiry | Response |
|-----------------------|--------------------|----------------|----------------------------------|---|---|
| 1 | Jan Donatelli | General public | | B: Viable Adaptive Reuse if possible. If not, A: Demolition | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 2 | Janet Elson | General public | Nearby resident and worker | I think the buildings should be rehabbed and out to a useful purpose such as archives if there is no way to make at least a portion residential | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 3 | Celine Kosian | General public | | These buildings should be saved and preserved through adaptive reuse. These buildings represent an important part of Chicago's history and significant opportunity to help revitalize a part of State Street that is experiencing high levels of vacancy. I would strongly urge that this body consider partnerships with other civic and nonprofit organizations to find uses for these buildings that would align the security needs for nearby Federal properties. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 4 | Jacob Klippenstein | General public | Farwell Courtyard LLC | I prefer the buildings be rehabilitated and utilized to their fullest extent. We have the opportunity to receive UNESCO world heritage status due to our historic skyscrapers. To demolish or continue to neglect 2 prime buildings would be an utter failure on our part to protect and preserve our cultural heritage. We cannot continue to make the same mistakes of the past and expect progress can be found through wholesale demolition as a form of "urban renew". We must recognize the unique history and character of this part of the loop that is present in these 2 buildings and preserve them for better and higher use for future generations to come. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 5 | Barbra Goering | General public | | Preserve. Explore and pursue development as archive buildings. That would be compatible with the academic institutions around the buildings and can satisfy security concerns. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 6 | Anonymous | General public | | Demolition. The U.S. government owes it to Chicago to develop a beautiful, grand park to compensate the city for the destruction of these properties and for creating a potential dead zone in the city center. The government should ensure the space is attractive and inviting to those who live, work and visit the area - and that it does not become a magnet for crime or loitering. I am skeptical of the security demands posed by the government, but it is clear that those security demands make any alternative to demolition all but impossible. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 7 | Anne Morse | General public | | I support Alternative B, Viable Adaptive Reuse of the buildings. There are meaningful and practical proposals for the reuse of these structures. It is aesthetically and commercially undesirable to leave gaps in the fabric of State Street. Having watched the former Block 37 lie fallow for decades, I have no confidence that new structures will be built in a timely manner in this economic climate, with double-digit vacancy rates in neighboring Loop office buildings. Historic buildings are Chicago's pride, and these buildings might be a source of revenue for tourism and hospitality like the Reliance Building, or serve as archives for many businesses and institutions that require them. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 8 | Corey Chan | General public | | My preferred alternative is adaptive reuse. These buildings contribute too much to the historical character and culture of Chicago to be demolished. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
|----------------|------------------|----------------|--------------------------|--|--|
| 9 | Anonymous | General public | | Adaptive Reuse. These are historic buildings which are a critical part of State Street. This is a good opportunity to put residential development on State, with at least 20% of the units reserved for affordable housing. These buildings must not be demolished. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. The adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks. Constitutional limitations on the government's authority to search and police activities in private residences cause residential use to present significantly greater risk than office or commercial use. GSA will not release any security information beyond what is in Section 1.3.1 of the Draft EIS. To ensure safety of the public, witnesses, defendants and Courthouse staff, federal law enforcement will not release any details on risks to the Dirksen Courthouse. |
| 10 | Gregory Brackens | General public | | Please perform Viable Adaptive Reuse of the buildings. Thank you. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 11 | Nikolas Gamarra | General public | | I would prefer Adaptive Reuse. High density urban environments have the lowest carbon impact per capita of human development. We should not be demolishing our urban environment. It's a city, cities have tall buildings next to each other. If the feds want privacy they can buy some window shades or move to the suburbs. Don't demolish the city. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 12 | Anonymous | General public | | B - Chicago is a city that prides itself on its architecture, and these buildings are phenomenal examples of the city's prowess. Destroying these buildings will be a permanent shame on the GSA and create a hole in loop. There are numerous other high rises around the federal courthouse that could all post safety risks. Perhaps rather than utilize demolition by neglect tactics, the GSA needs to fortify the spaces within their own buildings. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development. GSA will not release any security information beyond what is in Section 1.3.1 of the Draft EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse. |
| 13 | Thomas Kasputis | General public | | It is important to save existing structures and not create an empty 'hole' on State St | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
|----------------|-----------------|----------------|--------------------------|--|---|
| 14 | Christian Moevs | General public | | <p>These buildings should not be torn down.</p> <p>1. Downtown retail areas are always vulnerable, and S State St is currently especially vulnerable. Tearing these down will be another step toward the desert blight of so many "urban renewal" projects, that gutted downtowns into "open spaces" and parking lots. Just as the vacant buildings now have been a blight on several blocks, depressing that entire area of S State, which is now almost all vacancies, tearing them down will end up having the same effect. It will interrupt a retail corridor, stop foot traffic, depress surrounding retail, and become another open space for loitering and drugs (like the open space north of Harold Washington Library, just a couple blocks south).</p> <p>2. Historic / aesthetic considerations are real: they are the anchor upon which downtowns revitalize. When you destroy that, and try to replace it with utilitarian structures or nothing, the area is doomed. When you preserve the continuity, history, beauty, of the original buildings, the area can always be reclaimed. The contrast between South Bend (despite Mayor Pete's best efforts) and Goshen Indiana (which has replaced South Bend as the vibrant downtown attraction in the whole area), is quite a lesson. Goshen has all its original historic buildings; South Bend tore down or replaced many of theirs for urban renewal in the 70s.</p> <p>3. The security issues are of course exaggerated. You cannot blight the downtown of Chicago for every hypothetical imagining: they are endless. Just seal the back walls of those buildings. You'll continue to own them, so you can control them. The courthouse is surrounded by buildings: it is in the center of Chicago. If the fears were real, the courthouse should not have been put there. Now that it is there, you cannot sacrifice the downtown of one of America's greatest cities for it.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development.</p> <p>GSA will not release any security information beyond what is in Section 1.3.1 of the Draft EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse.</p> |
| 15 | Daniel Turton | General public | Northwestern Medicine | <p>I hope this message finds you well. I would like to express my strong support for Alternative B: Viable Adaptive Reuse of the buildings located at 202, 214, and 220 South State Street in Chicago, Illinois.</p> <p>Adaptive reuse represents a sustainable and forward-thinking approach to urban development. It not only preserves the cultural and historical significance of a community's built environment but also promotes economic vitality and minimizes environmental impact. By repurposing existing structures, we reduce the need for new construction and the associated resource consumption.</p> <p>Furthermore, adaptive reuse encourages creativity and innovation in design and function. It allows for the integration of modern amenities and technologies while maintaining the unique character and charm of the original architecture. This approach fosters a sense of continuity and connection to our shared heritage.</p> <p>In the case of 202, 214, and 220 South State Street, these buildings hold a rich history that is woven into the fabric of Chicago. Preserving them through adaptive reuse would not only benefit the community but also serve as a testament to the city's commitment to sustainability and cultural preservation.</p> <p>I wholeheartedly encourage the General Services Administration to give serious consideration to Alternative B. I believe it aligns with the long-term interests and aspirations of the Chicago community, fostering a vibrant and thriving urban environment for generations to come.</p> <p>Thank you for your attention to this matter, and I look forward to a future where these historic buildings continue to play a meaningful role in the life of the city.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |

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| 16 | Annika Donnen | General public | Lyric Opera of Chicago | I'm writing in support of the adaptive reuse option for the buildings at 202, 214, and 220 South State Street. As a relatively new Chicagoan (and someone who works in the Loop), I value our historic architecture and the sense of place that is unique to this city. However, an even greater concern for me is the environmental impact of demolition and new construction. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 17 | Jason Meter | Government agency | CTA Traffic Planning | Street-level access to CTA subway stations, as well as the underground pedway connection between the Red and Blue line stations must be maintained upon completion of any work or demolition at or around the site in question. If absolutely necessary to temporarily impact CTA access or facilities, coordination with CTA must take place as least 30 days in advance of any impacts. Notifications and requests for coordination may be sent to: traffic.planning@transitchicago.com | There would be negative, minor, and short-term impacts from the temporary closure of the Red Line access stairwell in front of 220 South State Street. However, there would be no long-term changes in CTA access under the Demolition or Viable Adaptive Reuse Alternatives. If there are temporary impacts to CTA access or facilities, GSA would coordinate with CTA at least 30 days in advance of any impacts. |
| 18 | Paul Kuhn | General public | | Please save these works of art. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 19 | Thomas Kwilosz | General public | | These buildings can be repurposed and still maintain Federal Security issues. They are architecturally unique, and significantly contribute the State Street historical retail district. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 20 | Kathryn Totaro | General public | | As a citizen of Chicago, I ask you to select "Alternative B Viable Adaptive Reuse" of these buildings. You wanted to know the environmental impacts of your alternatives - recycle, reuse and repurpose is best for all, I believe. Historic preservation, historic conservation - using what we already have is the healthier for the environment vs demo. It will also keep "Chicago" in the forefront of honoring its past while planning for the future. Best of both worlds. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 21 | Mary Brush | General public | BRUSH architects | BRUSH Architects was asked to design stabilization to both building facades by the GSA. This offer had a very small budget and literally designing stabilization extents while on scaffold. The budget did not cover the access and was pushed for another fiscal year. We did get a good look at the buildings anyway. They do require extensive work but they are salvageable or candidates for renewal. We also assessed the facade of Dirksen. If the security concern is for Dirksen, then follow our recommendations for security glazing and facade changes on Dirksen. Let the other buildings throughout Chicago with views of Dirksen continue to be excellent historic and new innovative architecture. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. GSA's evaluation is informed by the expertise of the U.S. Marshal Service and Federal Protective Service in response to the risks and threats to the Dirksen Courthouse and have thereby established the 15 security criteria to mitigate those security risks. The federal government has analyzed retrofitting the Dirksen Courthouse and determined that certain countermeasures would be infeasible from both a construction and cost consideration. GSA will not release any security information beyond what is in Section 1.3.1 of the Draft EIS. |
| 22 | Brian Whitlock | General public | Metropolitan Tower Condominium Association | The City land use plan has zoned that area for Educational Use. The area between Adams and Washington is zoned Retail Use and the Area North of Washington is the Theatre District. If the space was developed into a Federal Arts Center similar to the Kennedy Center in Washington DC, then it could be used by the neighboring secondary, tertiary and graduate schools as a performing arts center. Multiple theatrical spaces, classrooms and workshops could be placed within the space which could serve an incubator theatre venues for Community Theater and small theatre groups that current operate in and around Chicago in store fronts and substandard space. It would allow these groups to perform in a large central business and residential area. It could anchor the development of restaurants and retail development between Adams and Washington along State Street and revitalize State Street. | As stated in Section 3.3.1.2 of the Final EIS "the project site is zoned by the City as DX-16 (Downtown Mixed-Use District), which is defined as downtown high-rise offices or apartments with ground-floor businesses." All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 23 | Anna Mizzi | General public | | Please preserve these buildings. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

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| 24 | Joseph Olivier | General public | | I agree with the EIS that Alternative A, Demolition would involve significant and long-term negative consequences for the Loop historic business district. It would remove historically and architecturally significant buildings that are a part of Chicago's past. If Alternative B is chosen, these buildings can continue into Chicago's future in a historically and culturally significant way. Option B is clearly the winner here. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 25 | Laura Lavernia | Non-federal agency stakeholder | Advisory Council on Historic Preservation (ACHP) | Just confirming that GSA is not substituting NEPA for Section 106 but integrating the two (NEPA and Section 106). That is my understanding, but we just wanted to take a second to confirm. | GSA responded to the ACHP directly that it is integrating NEPA and Section 106. |
| 26 | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | <p>Landmarks Illinois appreciates the opportunity to review the Architectural Resources Survey Report and Assessment of Effects to Historic Preservation for the State Street undertaking. Having done so, we object to the finding that Alternative C, no action, will have no adverse effect on the Century and Consumers Buildings and 214 S. State Street.</p> <p>The assertion that no action would have no adverse effect relies on a presumption that the status quo is not detrimental to the building. This is not the case here. To date, GSA's available funding and actions have been insufficient to the maintenance needs of the building, and instead have been at best reactionary to a declining state of affairs. GSA will continue to have limited federal funds available for maintenance and repairs. Thus, it is reasonable to expect that the status quo - no action - will result in the continued deterioration of these buildings.</p> <p>In most cases, it is correct that a no action alternative would result in no adverse effect. This is based on an assumption that the building in question has a baseline functionality that will remain if no action is taken. This is not the case for the Century and Consumers Buildings and 214 S. State Street. With no action, we can reasonable expect these buildings to deteriorate toward a condition in which they are beyond repair.</p> <p>We recognize that Alternative C is couched as the no action alternative, and that the GSA and its consultants may be considering its effects outside the scope of this undertaking. However, in this instance, we find that to be a line of separation without meaning or applicability. For these buildings, a lack of action is an affirmative choice to pursue neglect leading to deterioration. Thus, we believe that Alternative C: Not Action, should be categorized as having an adverse effect. Thank you for considering our comments.</p> | All comments regarding the No Action Alternative have been noted, included in the administrative record, and taken into consideration. If the No Action Alternative is selected GSA will re-evaluate its effects. However, the Final EIS (Section 2.2) notes the No Action Alternative would not meet the project's purpose and need and is used as a baseline to evaluate impacts of the Alternative A, Demolition and Alternative B, Viable Adaptive Reuse. This is consistent with the National Environmental Policy Act (NEPA) process. |
| 27 | Teresa Peek | General public | Tour Through a Lens | I'm unsure why (or if) these buildings can't be sold to a public or private non-federal entity for repurposing. I think whatever is decided should be within the scope of the current research on "what to do to revitalize The Loop". I don't see these two being mutually exclusive | Under the Viable Adaptive Reuse Alternative, GSA would issue a Request for Lease Proposals (RLP) to seek a reuse that meets the purpose and need for the Proposed Action. |
| 28 | Laura Lavernia | Non-federal agency stakeholder | ACHP | ACHP staff has no comments regarding the draft EIS at this time. | Thank you for your comment. |
| 29 | Christopher Koepfel | Non-federal agency stakeholder | ACHP | ACHP staff has no comments regarding the draft EIS at this time. | Thank you for your comment. |

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| 30 | Tara Toren-Rudisill | General public | Klein & Hoffman | For the better part of the past 20 years, I have had the privilege of being the building envelop consultant, on behalf of various Architects of Record, for both 202 and 220 South State. I am one of the few individuals who have performed up-close observations of 100% of the facades. I would like to commend the local GSA staff for their efforts to maintain the facades with the limited funding available - all work completed was designed to comply with preservation standards and qualified contractors were selected to perform the work. Over 100 years of pollution has built up on the facades diminishing their grandeur but both facades are salvageable. If restored, these buildings would rival the Wrigley Building and other well-known Chicago landmarks. Regarding court security, removal of these buildings would open up numerous lines of sight from privately owned buildings and parking garages. Both 202 and 220 (and the surrounding site) can be successfully hardened to increase protection. There are a number of firms that specialize in both threat assessment and protective design that are qualified to develop such solutions for historic structures, including some firms located here in Chicago. It is my fervent hope that a narrow understanding of the buildings' potential does not result in the loss of these beautiful buildings that were once anchors for the development of the City of Chicago. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development. GSA will not release any security information beyond what is in Section 1.3.1 of the Draft EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse. |
| 31 | Anne Morse | General public | | Hello, everyone. Thank you so much for giving us this opportunity. As a 35-year-resident of Chicago, I've seen a lot of changes on State Street, up and down State Street, there's been a lot of very interesting ideas proposed, some of them executed. Unfortunately, the vacancy rate and the decline of State Street has a tendency to depress creative reuse and adaptive reuse of that space. Voids on the streetscape are a contributing factor to that decline. So demolition has a very feel effect on the culture of Chicago of the way we live in the city. One of the things I'm inclined to point out is that there are some things that didn't get mentioned in the impact statement and one of those is that when you take down those buildings, you're putting them in landfill, you're not just leaving a whole in the mouth of State Street, but also distributing that waste material elsewhere, and in the event that, at some point, something is built, we're using extractive purposes to create the materials, to build new buildings, which, unfortunately, in our experience, have a tendency to then turn into landfill themselves in a much shorter period of time than 19th century buildings, which were essentially built to last. So I'm hoping all of that kind of thing will be taken into consideration, that people will have an opportunity to build on the creative or adaptive reuse that have been suggested and to come up with a meaningful change. Another situation that I haven't heard discussed is whether or not, it seems as though it's being presented as an all or nothing situation where all three properties will have to be demolished. Perhaps one of them can be saved. Perhaps one of them can anchor that streetscape, which is a very important corner in Chicago. Thank you very much for your time. I appreciate that. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. Final EIS Section 3.7.2.1 discusses demolition debris. The demolition debris, without reuse or recycling, would account for approximately 0.23 percent of Chicago's permitted landfill capacity. With reuse and recycling, the amount would be reduced to 0.05 percent of capacity. The solid wastes generated would be an increase from existing conditions but would not exceed the capacity of local landfills. Demolition debris would be managed in accordance with applicable regulations and would be disposed of at appropriately licensed facilities with capacity. The Demolition Alternative would result in a negative, minor to moderate, long-term impact to landfills from the demolition-related solid waste. GSA sponsored two charrettes in September and December 2023 to explore possible adaptive reuse approaches for the State Street buildings. |

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| 32 | Kendra Parzen | General public | Landmarks Illinois | <p>Good afternoon. My name is Kendra Parzen. I'm the advocacy manager for Landmarks Illinois. We are the statewide nonprofit organization advocating for historic preservation. In both 2022 and 2023, we included these buildings on our annual list of the most endangered historic places in Illinois, and we appreciate this opportunity to comment on the draft GIS. So I have to say, I think we were pleasantly surprised by the draft's findings regarding the Impacts of alternative A demolition; and alternative B, adaptive reuse. We strongly agree with the characterization that demolishing these buildings would have impacts that are negative, significant, and long-term, and we also agree that adaptive reuse would have impacts that are beneficial and long-term. So, if these findings, Frankly, pose the question, how can the demolition of these buildings remain on the table when adaptive reuse is clearly the superior alternative from an environmental perspective? Nevertheless, since demolition is still very much on the table, we also feel compelled to comment on the mitigation reposed in this draft report, which is to landscape the cleared lots as green space, although there are certainly examples of flat green spaces in plazas in the greater Loop area, with the exception of Christopher Park. These examples are not located along State Street, one of our cities densest corridors. Open space with landscaping is not consisting with the visual character of State Street nor with land use plans for this area of the city. The aesthetic and visual effects of this change would not be minor to moderate but severe, and would be extremely poor compensation for the loss of these significant historic buildings. Thank you for considering our comments. I anticipate submitting additional comments in writing.</p> | <p>Your comment regarding the impact determination for aesthetic and visual resources under the Demolition Alternative was carefully considered by the project team. The EIS was updated to differentiate between impacts at the project site and the surrounding area, and with context that the impact determination is based on viewer activity, viewer sensitivity to change, viewer location, and duration of view. These updates are captured in Section 3.2.2.1 of the Final EIS.</p> <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>The Section 106 process is ongoing. GSA has considered the adverse effects on historic properties that would result from the Demolition Alternative and Viable Adaptive Reuse Alternative. The Section 106 consultation process has identified appropriate mitigation measures, included in the draft Section 106 Programmatic Agreement in Appendix B.</p> <p>If the Demolition Alternative is selected, a flat, ground-level landscaped plaza would be designed to fit in with the overall visual character of the surrounding area and GSA would coordinate the design with the SHPO, City of Chicago, and other consulting parties.</p> <p>Demolition was analyzed as a proposed alternative to address the purpose and need which must address security needs of the Dirksen Courthouse, respond to Congressional Intent in the 2022 Consolidated Appropriations Act, and manage federal assets.</p> |

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| 33 | Shawn Ursini | General public | | <p>I work with the Council on Tall Buildings and Urban Habitat, but my statement will be of my own opinion. And I'm just going to start with a statement I found on the GSA's website, the GSA's goal are to help its customers reach their sustainability goals, reduce environmental impact to the federal government, and to make the -- make the working environment more sustainable and environmentally friendly. So I just want to pose the question, how does demolition further these goals, because it actually runs counter to them? Even if, hypothetically, these buildings were entirely recycled with their demolition debris under scenario A, which that's not even possible, but even if, hypothetically, it was, it completely ignores the embodied carbon that exists within these buildings today and I felt that that was lacking in the draft to the EIS because it's not really fully considering the environmental impact holistically if these buildings were to be removed. And while I'm encouraged by the draft EIS making a mention of potentially retaining these buildings, it does appear that decision has already made it toward demolition, in no small part because the appropriation language for the congressional funding with regard to these buildings does specify demolition. So even if we had a favorable outcome for retaining these buildings ultimately out of this process the legislation would need to be amended, and there would be an additional hurdle to be making that happen. I hope that does not impact the final decision that's yet to be made. And the EIS does mention the obvious impact to Cultural resources by demolition of these existing buildings. However, it doesn't consider the broader impact that it's going to have on State Street overall. Which is an extraordinarily distressed commercial retail market right now and if you destroy part of the streetscape. That streetscape is going to look more like a mouth with broken teeth, rather than a holistic hole that's contributing to Chicago's historic resources of this being a birthplace of the skyscraper. And some of the preservation experts have mentioned that if we were going to try to apply for UNESCO World Heritage, this sort of erodes our standing in even doing so. It's extremely important that we retain some of these historic buildings because they were some of the earliest skyscrapers. And, you know, where does the security perimeter end, like 209 South State Street is up for sale right now as a potential redevelopment opportunity? Are we going to say that no one can invest across the street, too, because of security concerns? I mean, I understand the concerns that the federal government has on these properties, but there are other new courthouses and renovated courthouses in urban centers, like, Des Moines, Greenville, Nashville, Toledo, Savannah, Harrisburg, Mobile, Alabama that the GSA has just invested in. But if we consider that Chicago's unique environment because of the level of density we have, maybe we should consider that a federal courthouse in a major city center is not a compatible use, and maybe consider relocating elsewhere in the city. Thank you.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>The potential impacts from embodied carbon that could result from implementing the Action Alternatives and No Action Alternative are described in Section 3.6.2 of the EIS. If the buildings at 202, 214, and 220 South State Street are demolished, the useful life of the building materials would be cut short. If new buildings were to be built, the embodied carbon emissions for the new buildings would significantly outweigh the embodied carbon emissions from viable adaptive reuse. For this project, new buildings would not replace the demolished buildings, therefore demolition would have a negative, negligible, short-term impact on embodied carbon.</p> <p>The broader impact of the Action Alternatives and No Action Alternative on State Street are discussed in Section 3.5, Socioeconomics and Environmental Justice.</p> <p>GSA has not developed a cost estimate of relocating the Dirksen Courthouse any further than what is discussed in Section 2.3.2. The cost would far exceed that of adaptive reuse or demolition of the buildings. Additionally, relocating the Dirksen Courthouse tenants would raise the question of what to do with the Courthouse, which is also a historic building. As noted in Section 1.3.3, GSA has not identified a federal need for the buildings at 202, 214 and 220 South State Street, so therefore finding a federal use for the 1.4 million square foot Dirksen Courthouse would be unlikely.</p> <p>The Final EIS Section 3.3.2.1 notes that the Demolition Alternative would have a negative, significant, long-term impact to land use. However, GSA would coordinate with the City of Chicago to plan and develop the site in such a way that advances the City's planning goals.</p> |

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| 34 | Mary Lu Seidel | General public | Preservation Chicago | Thank you very much. My name is Mary Lu Seidel. I'm the director of community engagement at Preservation Chicago. We've been involved in every community meeting, consulting party meeting to date. We're encouraged by this process of late, but we agree with -- I want to concur with all of the comments Kendra Parzen from Landmarks Illinois made a little while ago about the process and our concerns about the future. The impact statement also indicate that there's no impact really of not doing anything, and we would disagree very clearly that there is significant impact of not doing anything on any of these buildings because for the last 12 years that's what's happened to them. It hasn't had a good positive impact. So we think that really needs to be clearly spelled out in the EIS that no action will be a detrimental -- a significant detrimental impact. But I just wanted to reiterate those points about the process, making sure that we really need to lighten up on those 15 criteria, I think to the other gentleman's point about if there are so many concerns being so close to many high-rise buildings for the federal courthouse, that maybe they should consider a different place for that as well. But we care about the concerns and the safety for the judges. We care about all of the people who work and visit those buildings, but we also think that you can preserve -- you can address all of those issues without destroying part of our city's history. Thank you. | GSA has not developed a cost estimate of relocating the Dirksen Courthouse any further than what is discussed in Section 2.3.2. The cost would far exceed that of adaptive reuse or demolition of the buildings. Additionally, relocating the Dirksen Courthouse tenants would raise the question of what to do with the Courthouse, which is also a historic building. As noted in Section 1.3.3, GSA has not identified a federal need for the buildings at 202, 214 and 220 South State Street, so therefore finding a federal use for the 1.4 million square foot Dirksen Courthouse would be unlikely. All comments regarding the No Action Alternative have been noted, included in the administrative record, and taken into consideration. If the No Action Alternative is selected GSA will re-evaluate its effects. However, the Final EIS Section 2.2 notes the No Action Alternative would not meet the project's purpose and need and is used as a baseline to evaluate impacts of the Alternative A, Demolition and Alternative B, Viable Adaptive Reuse. This is consistent with the National Environmental Policy Act (NEPA) process. |
| 35 | Ward Miller | General public | Preservation Chicago | Thank you. For the record, Ward Miller, executive director of Preservation Chicago. We at Preservation Chicago want to continue to encourage the General Services Administration, the justices and the related parties to preserve, restore, and reuse the Century and Consumers buildings located at 202 and 220 South State in the heart of the Chicago Loop. Century and Consumers Building were part of Chicago most endangered for the last two years and actually once about a decade ago, and we were assured during that time that they were in good hands and safe. We at Preservation Chicago, along with the city of Chicago and many of the architectural and Preservation world are of the opinion that the 16-story Century Building of 1915 by architects Holabird and Roche, along with the 21-story Consumers Building by Jenny, Mundie and Jensen, should also become designated Chicago landmarks. As you know, these structures have been taken into the City's landmarks process to be considered for designation and thereby join other Chicago buildings on the world stage where we would welcome them. The proposed demolition will create a severe adverse effect, not a moderate impact to The Loop and The Loop and Retail National Register Historic District, the State Street street wall, and will cause much undo and severe harm to Chicago's architectural legacy. It will also cause a hole in the city center, much like Block 37 harmed this historic built environment, and profoundly and adversely impact this incredible unique collection of terra cotta buildings and skyscrapers on State Street and throughout The Loop in downtown Chicago. These two structures are essentially the Reliance Building in waiting, referring to the building at State and Washington, just three blocks to the north. We saw an amazing transmission there. We also want to acknowledge the draft environmental impact statement prepared for the buildings at 202, 214, and 220 South State appear to be flawed at best and contradictory. The document also notes, among other items, that the GSA should reduce their real estate footprint in accordance with their statutory mission and in addition to a series of presidential memorandums and implementation policies. So that would imply that perhaps the Century and Consumers Building could | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. Under the Viable Adaptive Reuse Alternative, GSA would issue a Request for Lease Proposals (RLP) to seek a reuse that meets the purpose and need for the Proposed Action. GSA determined that no federal agencies had a use for the space and the federal government was tasked with reducing its footprint in accordance with Action Item 5, Freeze the Footprint, in Management Procedures Memorandum No. 2015-01 (March 25, 2015). Additionally, there are existing federal buildings more suitable for federal use than those at 202-220 South State Street, which do not meet mandatory design standards and performance criteria for GSA-owned buildings. The cost of upgrading combined with physical limitations of the buildings render federal use non-feasible. Refer to Section 1.3.3 Managing Federal Assets for more information. Although the U.S. Government is not legally bound to any obligations attendant to landmark designation, GSA addressed this in an official letter sent in response to the Commission on Chicago Landmarks regarding the proposed Preliminary Landmark Recommendation for the Century and Consumers buildings on April 13, 2023. The letter stated "GSA has long acknowledged the historic and architectural significance of these historic properties. We recognize that these two buildings are identified as contributing properties, under Criteria A and C at the local level of significance, to the National Register of Historic Places-listed, Loop Retail Historic District. As such, local significance is acknowledged and considered during the consultation process required by Section 106 of the National Historic Preservation Act (NHPA).... GSA is formally neutral on the Commission's proposal to designate the buildings as landmarks under the Commission's criteria." |

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| | | | | <p>be offered for sale as an option and still be in compliance with other requirements pertaining to safety issues at the Chicago Federal Center and the Dirksen Federal Courthouse. This could also include possible state and municipal offices as well. A charrette was held last Thursday at the Wisinski Building, became obvious that there are other nearby federal properties outside the boundaries of the Central Loop that could be sold at a premium for private redevelopment. This includes the 13-story Railroad Retirement Board Building, also known as the Lipinski Building at 844 North Rush Street in the Gold Coast Community and located about a mile from the federal center. This structure is more than 90 percent leased to other entities, including a Bentley Rolls-Royce and Lamborghini showroom and only three floors of that massive building are used for the Railroad Retirement Board. We also have a building in the West Loop built in 1975 at 600 West Madison. The potential sale of those premium properties on the Gold Coast and The West Loop and the consolidation of offices into those structures or into the Century and Consumers Building could also very much support the renovation and restoration of the Century and Consumers Buildings. Therefore, many of our federal services could be consolidated into the federal center complex. This is a tremendous idea which can serve the needs of the GSA, its agencies for years to come, while also satisfying safety requirements and preserving the promise 17 years ago to preserve these structures in these two prominent Loop sites. We have additional comments that we'd like to submit in the written form that go outside the three-minute testimony conversation. I also want to ask if we continue to have terrible problems with half the people that are trying to speak online, if their comments are in the written form that those could be read by the speaker, just to share with all of us in the audience, a more public transparent process is what we're all looking for, and we look forward to a positive impact here. We all want to see these buildings preserved. Thank you.</p> | |

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| 36 | Rolf Achilles | General public | | Hi, Rolf Achilles, and thank you for the opportunity to talk to you, even though the floor hasn't turned over yet, it's still very stable in here. My comments are about the three buildings in discussion because there's an aspect of those buildings that we haven't really talked about at all, not just preserving or destroying them, but the reason those buildings are significant today is not just because they're skyscrapers, but its they're terra-cotta. They're in the middle range of Chicago's great terra-cotta boom. Chicago invents architectural terra-cotta in a new way in the course of the 19th century and we have numerous examples, and, first, in fact, we have the first signed piece of the terra-cotta in the United States. It's by Isaac Scott. It's at 1401 North Dearborn Street, but these buildings are terra-cotta, a whitish terra-cotta, which was innovative in an age of soot and grime. They're white terra-cotta, the Reliance Building was just before them and The Wrigley Building is just after them. They're the kids in between this block is the two in between where all around the buildings were constantly soot covered, but these two weren't in 1910 to '20s, and that makes them significant, not just as skyscrapers that didn't get dirty and could be sort of self-washed, and it makes them significant because they're of a terra-cotta age that's right in between the early terra-cotta and then the later terra-cotta. So they're superb examples for terra-cotta, and if you tear them down you do have a big hole and you lose that aspect which for a world heritage is quite significant because you can argue about the history of terra-cotta in Chicago. You don't have to go to Tulsa or some other city to see what Chicago has done and possibly takes away. Those are my comments. Thank you very much. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. 202, 214 and 220 South State Street are contributing elements of the Loop Retail Historic District, and their architectural significance is acknowledged in the assessment of cultural resources. Section 3.1.1.3 of the Final EIS discusses the cultural significance of 202 and 220 South State Street including the terra-cotta elements of the buildings. |
| 37 | John Borgman | General public | | Hi, my name is John. I speak as a resident of Chicago for over two decades and as a board member for The Institute of Classical Architectural and Art. I'd simply like to say somebody mentioned here about the UNESCO, there is an active proposal for, I believe, nine sights for early American skyscrapers in Chicago. I believe that the Century and Consumers Buildings are direct descendants of those buildings that are in those sites being considered by UNESCO. So essentially the story of Chicago's architectural will be discontinuous with the loss of the Century and Consumers Buildings, so the link between Sullivan, Jenny, Root, Atwood, Roche, and Holabird onto Mies Vander, Bertrand Goldberg, Curtis Graham, Fossler Kuhn, Stanley Tigerman and currently John Ronan, Carol Rusbarman, Jean Davis [all names phonetic] and others, that's story will be cut with the loss of these buildings and I believe it's not a moderate benefit to Chicago to save them. Thank you. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. 202 and 220 South State Street are currently not under review by UNESCO for the World Heritage program. In 2017, a preliminary group of nine primarily commercial buildings in Chicago's central business district, the "Loop," were submitted by the U.S. Department of the Interior to the UNESCO World Heritage Tentative List. This means that the proposal is potentially eligible for future nomination by the U.S. Department of the Interior for UNESCO consideration. |

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| 38 | Brian Whitlock | General public | | <p>Thank you. Brian Whitlock, I'm a 69-year resident of the city of Chicago. I live at Jackson and Michigan, and I'm the president of the Metropolitan Tower Condominium Association, which is a building that is of historical significance also. We're celebrating our 100th year next year. It's important, I think, to preserve the character of the city and so adaptive reuse I think would be my first preference in terms of the property. But I think the environmental impact statement does ignore the fact that demolition, if it was to go forward, would at least free up the space and allow it to be developed otherwise. I submitted comments with my registration. I'll echo some of those comments that -- They are that -- and I would like to remind the GSA that the zoning for this area is educational at this end of State Street and so as educational space, we're surrounded by a number of universities and also high schools that lack theatrical space and performance art space. The north end of State Street is the theater district and that center part of State Street is retail. I think if the space was readapted or it was replaced in demolition, I think to have some sort of a fine art center would be a wonderful addition to this space, so certainly on the lower levels and lower floors to have that be theater, theatrical-type and performance arts space, have educational and classrooms on the middle floors, and then perhaps lean on the comments that were by the Dreyfus [phonetic] people having the upper floors perhaps be repurposed and to some other governmental space and relocate governmental employees out of the spaces that, perhaps, could be sold and have those people move back into the downtown central corridor I think would be important. So I think reuse of the space would be the best alternative. Doing nothing as -- has been detrimental to State Street. Doing something I think is imperative, whether that's demolition and replacement, whether it is adaptive reuse. I think something needs to be done. We just can't keep going along. State Street is dying, and I think doing something, particularly something that might bring back and be adaptive in connection with the theatrical and educational would certainly help resurrect some of the retail space in the center of State Street as well. Thank you.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>As stated in Section 3.3.1.2 of the Final EIS "the project site is zoned by the City as DX-16 (Downtown Mixed-Use District), which is defined as downtown high-rise offices or apartments with ground-floor businesses."</p> <p>If the Demolition Alternative is selected, a flat, ground-level landscaped plaza would be designed to fit in with the overall visual character of the surrounding area and GSA would coordinate the design with the SHPO, City of Chicago, and other consulting parties. Future use of the plaza under the Demolition Alternative is discussed in Section 3.2.2.1 of the Draft EIS.</p> |

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| 39 | Joe Antunovich | General public | | <p>Good afternoon. My name is Joe Antunovich. I'm the CEO and founder of Antunovich Associates, an architectural firm here in Chicago. I've lived in Chicago and worked in Chicago for the last 50 years as an architect. I'll make a few comments here and then we will also submit a written document expanding my comments. Our firm has worked as restoration architects on buildings in Chicago and mainly on State Street. We renovated the former Goldblatt Building, the historic Goldblatt Building, for DePaul University, a little south of the subject property. And also north of the subject property we restored the beautiful Reliance Building from a decrepit falling down office building into one of the gyms of American architecture, bringing it back from office to a hotel. As mentioned earlier, both those buildings are beautiful terra-cotta enclosed buildings, much like the buildings that we were discussing at 202 and 220 State Street. Our experience with this site goes even further. In 2017, we were part of a development team that looked at the feasibility of adaptive reuse for these important buildings, these beautiful terra-cotta buildings that form the nucleus of development along State Street. Right now they sit as a missing tooth in the development all the way along our great street. Our studies in 2017 and presented to both the city of Chicago and the GSA address all of the safety concerns that were raised by the GSA and our mixed use development created almost 500 new residential apartments in the three buildings that are being discussed today, in addition to 25,000 additional square feet of retail on the ground floor. To renovate and to bring back these buildings with activities such as these is exactly what our city is craving and what The Loop needs to bring people back into the heart of our city. Please, please, do not demolish these buildings. These are our jewels. We are the caretakers of these beautiful, beautiful buildings and other examples along State Street show how the renovation of these buildings can assist and continue the rebuilding of this great, great, great street. So I encourage you, I encourage you, please, to pursue the viable adaptive reuse option alternative B and do not, do not demolish the gorgeous, gorgeous buildings that great architects in the past have passed on down to us for our care and loveable, loveable nourishment. Thank you very much.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>The viable adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to meet GSA's and federal law enforcement agencies' security objectives for the Dirksen Courthouse.</p> <p>Constitutional limitations on the government's authority to search and police activities in private residences cause residential use to present significantly greater risk than office or commercial use.</p> <p>GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, defendants and Courthouse staff, federal law enforcement will not release any details on risks to the Dirksen Courthouse.</p> |

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| 40 | Anna Mizzi | General public | | <p>Sure. Hello, my name is Anna Mizzy, and I am a fourth generation Chicagoan. As such, I love this city and hope that the GSA uses their unique opportunity it currently has to choose to restore and repurpose these buildings rather than to demolish. They are beautiful buildings with intricate design that speaks to the historic majesty of Chicago. Buildings like these are no longer constructed and cannot be made as the materials and scope are a thing of the past. As a federal employee, a former purchase card holder, and a current core, I know the responsibility the government has to make fiscally sound use of taxpayer dollars. The federal government is also encouraged to make environmentally conscious decisions for purchasing. By choosing to repurpose, this could be seen as a feather in the GSA's cap to adhere to both. Aside from the 56 million dollar demolition and any costs to rebuild, assuming about 10 million dollars a floor, there is also the environmental cost of any chemical, particles in the air during demolition, the landfill waste that is produced, and then the raw materials to be used as well as. Lastly, there are interested groups desiring to repurpose the space that would meet NEPA security required for the Dirksen Building which was the impetus of the original purchase. As for the future use of this site, it is evident that the presence of the buildings do not pose a risk on their own. I am a resident of Printer's Row, which is just about four blocks south, and this is my neighborhood. The Loop does not need more vacant lots and empty storefronts, office use downtown is declining and there are grants currently in place to bring businesses back to the LaSalle Corridor, so there's little need for the typical reasons for new construction. I am in favor of -- for these buildings to remain and be repurposed as an archive or such. Thank you.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>Section 3.8 of the Final EIS describes potential air quality impacts. Negative, minor, short-term impacts on local air quality and negative, negligible, short-term impacts on regional air quality would occur under the Demolition Alternative. GSA would incorporate Best Management Practices and control measures, such as those described in the EPA's Construction Emission Control Checklist (Appendix D, Agency Correspondence), to control emissions from demolition and construction activities.</p> <p>Final EIS Section 3.7.2.1 discusses demolition debris. The demolition debris, without reuse or recycling, would account for approximately 0.23 percent of Chicago's permitted landfill capacity. With reuse and recycling, the amount would be reduced to 0.05 percent of capacity. The solid wastes generated would be an increase from existing conditions but would not exceed the capacity of local landfills. Demolition debris would be managed in accordance with applicable regulations and would be disposed of at appropriately licensed facilities with capacity. The Demolition Alternative would result in a negative, minor to moderate, long-term impact to landfills from the demolition-related solid waste.</p> <p>GSA's Preferred Alternative is Viable Adaptive Reuse and GSA welcomes input from all groups to develop a viable reuse alternative.</p> |

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| 41 | Brian Hodapp | General public | | <p>Great. Hello, everyone. I am a long-time resident of the city of Chicago, and I'm passionate about protecting the architectural legacy of our city. I am speaking simply as a city resident without any agenda other than the desire to ensure the Century and Consumer Buildings are preserved for future generations and I -- my hope is that repurposing the buildings as possible instead of destruction as and demolition as the solution. I, along with the public, would like to come out broadly in defense of these buildings and their historic character which contribute to The National Register of Historic Places and there are a range of reasons not to demolish these buildings. Post-war urban renewal gutted viable commercial corridors and destroyed neighborhoods and, today, South State Street already has dozens of retail vacancies because of pandemic era closures. And demolition of the Century and Consumers Buildings would be bad for business. It would create an additional void on Chicago's most iconic thoroughfares. The demolition is also highly bad for the -- very bad for the planet. Post-war urban renewal consigned entire neighborhoods to the trash heap. It wasted resources and energy. So sending millions more pounds of the Century and Consumers Buildings, terra-cotta, brick, glass and metal into a landfill would be very anti-environmental friendly. It's been contended that the Centuries and Consumers Buildings have been vacant and unused for years and have fallen into serious disrepair, leaving demolition as the only option, but let's make no mistake that this disrepair is the direct result of GSA's lack of maintenance and care for the buildings and it's not a reason for their demolition. Meanwhile, the GSA has expertly maintained the Dirksen Federal Building, replacing the exterior curtain wall in 2006 and repainting the complex with black paint. The GSA owns an inventory almost 500 historic buildings spanning over 200 years of American architectural history. Each of these buildings demands that GSA consider design, security in planning surrounding the buildings in concert with the area surrounding them. It's been argued that the Century and Consumer Buildings are too close to the Dirksen and that no plan put forth for private redevelopment has addressed the security risk, yet the Dirksen is within the dense urban core of downtown Chicago adjacent to numerous buildings including 131 South Dearborn and the Monadnock Building at 53 West Jackson. How can proximity to these buildings be considered safe while The Century and -- proximity to The Century and Consumer Buildings is not? Urban renewal is widely agreed to have been a mistake with devastating consequence that reinforce segregation, increased dependency on the automobile and wiped entire neighborhoods off the map. Let's not repeat this mistake today. If GSA claims that The Dirksen Courthouse is at risk, then the GSA should have the expertise and resources to mitigate that risk by not devastating a neighborhood, The Loop, but reassessing the safety of the courthouse and seeking a safe, private redevelopment plan for the Century and Consumers Building. This is an approach that is completely feasible and cost effective for the GSA and it will preserve the vibrant, dense, commercial core of the city, The Dirksen Building serves. I hope that the GSA can work to make this not a gravel pit in the heart of The Loop, the future legacy of the site of the Century and Consumer Building. Thank you.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>Demolition debris is discussed in the Final EIS Section 3.7.2.1. The demolition debris, without reuse or recycling, would account for approximately 0.23 percent of Chicago's permitted landfill capacity. With reuse and recycling, the amount would be reduced to 0.05 percent of capacity. The solid wastes generated would be an increase from existing conditions but would not exceed the capacity of local landfills. Demolition debris would be managed in accordance with applicable regulations and would be disposed of at appropriately licensed facilities with capacity. The Demolition Alternative would result in a negative, minor to moderate, long-term impact to landfills from the demolition-related solid waste.</p> <p>The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development.</p> <p>GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse.</p> |

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| 42 | Elizabeth Blasius | Non-federal agency stakeholder | Preservation Futures | <p>Good afternoon. My name is Elizabeth Blasius. I'm an architectural historian and co-founder of Preservation Futures. Our office is in the Monadnock building, and my professional background includes work on natural disaster recovery and mitigation for FEMA, and the sensitive retrofit of historic buildings that may be sensitive or -- or the subject of an act of terror under the Department of Homeland Securities, targeted violence and terrorism for pension grant programs. For the record, I stand in solidarity with my colleagues here in Preservation. I have specific comments on the other alternatives considered and dismissed as they relate to the retrofitting of the Dirksen Courthouse. The section is one paragraph. The reason we are discussing the proposed demolition of these buildings, the safety at the Dirksen Courthouse is owed more than just this one paragraph in the draft EIS, and the GSA needs to provide more detail on that with respect to its responsibility to the public and public properties. I understand the undertaking is to address the potential security vulnerabilities associated with 202, 220, and 212 South State Street to effectively manage the security risks at the Dirksen Federal Courthouse. And the undertaking is to address security measures at the Dirksen Courthouse, the undertaking is, per the logic and process of NEPA and NHPA and 106, should be fully articulated and explained for the benefit of the public. In the draft EIS, the paragraph references an earlier section, 1.3.1 that states, "the ability of the federal government to retrofit the Dirksen Courthouse with countermeasures to address known security needs would be infeasible from both a construction and then cost consideration standpoint." Section 2.3.1 then states, "security, numerous studies by the FBI and the United States Marshal service have demonstrated that additional countermeasures at the Dirksen Courthouse are cost prohibitive and not possible because of the design and the construction of the Dirksen Courthouse. Additionally, other suggested countermeasures, such as blackout curtains, are not acceptable security standards." I want to speak briefly on construction and then cost consideration of that earlier section, the countermeasures hang on the U.S. courts design guide which states, exceptions can be made to the design guides standards if they are proved by the respective authorities and reasons for renovation can be guided by a modernization of major repair and alteration project planned by the GSA to my address aging buildings systems or to upgrade current standards and codes. There are acceptable security standards explicitly stated by the design guide, but we need more detail on what has been done to the Dirksen to mitigate security concerns. To summarize, we need to hear specifically from the FBI, the U.S. Marshals Service, the Dirksen Courthouse Security and Safety Committee, with respect to the to, you know, of course, our own security. To understand how these have been analyzed, the flexibility of the U.S. courts' design guide, and the ability for Congress to allocate funding needs to be fully expanded, that 53 million that was allocated to demolish the buildings, that same money could go right to the Dirksen per Congress. Congress. Thank you.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>GSA's evaluation is informed by the expertise of the U.S. Marshal Service and Federal Protective Service in response to the risks and threats to the Dirksen Courthouse and have thereby established the viable adaptive reuse security criteria to mitigate those security risks. The federal government has analyzed retrofitting the Dirksen Courthouse and determined that certain countermeasures would be infeasible from both a construction and cost consideration. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse.</p> |

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| 43 | Tara Toren-Rudisill | General public | Klein and Hoffman | <p>Okay. Thank you. My name is Tara Toren-Rudisill. I am currently a senior associate with Klein and Hoffman. We're an architecture and structural engineering firm here in Chicago. My comments today are my own. For the better part of the past 20 years, I've had the privilege to be one of the building consultants on behalf of various architects of record for both 202 and 220 South State Street. I'm one of a very few people who have had the opportunity to observe the facades close up 100 percent. I would like to first commend the local GSA staff for their efforts to maintain the facades with the extremely limited resources and funding available to them. Work, repair work, has been -- was designed in accordance with preservation standards and completed by qualified contractors. Over 100 years of atmospheric pollution has diminished the grandeur of these buildings, but the facades are salvageable, if restored, these buildings will rival The Wrigley Building and other Chicago landmarks. Regarding site security, removal of these two buildings would open up numerous site lines between the court and several privately owned buildings and parking structures in the immediate vicinity of the building -- of the court. Both historic buildings and the site can be hardened. There are several firms that specialize in both threat assessment and protective design that can develop necessary solutions for historic structures, including firms located here in Chicago. It is my fervent hope that limited understandings of all of the issues affecting this specific site are -- are discussed more holistically and that a limited understanding does not result in the destruction of these gorgeous buildings that are part of the foundation of the city of Chicago and its heritage. Thank you.</p> | <p>GSA's evaluation is informed by the expertise of the U.S. Marshal Service and Federal Protective Service in response to the risks and threats to the Dirksen Courthouse and have thereby established the viable adaptive reuse security criteria to mitigate those security risks. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS.</p> |
| 44 | Brian Kaempfen | General public | | <p>I'm a 33-year resident of Chicago. Built from 1902 to 1905, 19 stories ornately terra clad -- terra cotta-clad office building and demolished. Does this story sound familiar? This is not the Century nor Consumers Buildings though, it was the Republic Building located at 29 South State that was demolished in 1961. Unlike the Century and Consumers Buildings, which are being discussed for demolition due to abandonment and neglect, the hands of the slumlord that eminent domained them in 2005, the Republic Building was torn down to make way for the new, but shorter, Federal Home Federal Savings and Loan Association Building. Next door to the Home Federal Building is the 1949 Woolworth Building, currently for sale, but is being marketed as a redevelopment site for a high-rise apartment building. Both of these buildings would sit across from the street from the future security zone should the Consumers and Century Buildings both get demolished. How soon until the federal government then wants to procure these and tear them down since they would now have unobstructed views of the same courthouse which caused the Centuries and Consumers Buildings to be raised in the first place? Precedents are dangerous because once they're set, they're impossible to reverse. If GSA destroys these buildings for security, where does it end? Why not the next two across State? The National Register of Historic Places listed in the Monadnock Building? The Citadel Building across Adams? The landmark Berghoff Restaurant next door? How many of blocks, how many square miles of vacant land does the federal government need to obliterate for a veil of safety? I chose the wording "veil of safety" deliberately. The Century and Consumers Buildings aren't the problem. They're the excuse. The GSA isn't addressing the root problem, but, instead, trying to cover over the actual problem, like painting over a crack on your wall versus addressing the settling foundation. All Demolition of the Consumers</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>GSA's evaluation is informed by the expertise of the U.S. Marshals Service and Federal Protective Service in response to the risks and threats to the Dirksen Courthouse and have thereby established the viable adaptive reuse security criteria to mitigate those security risks. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS.</p> |

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| | | | | <p>and Century Buildings would do is push the problem across the street or a block over. 54 million dollars is a lot of money. Can the courtrooms, judges' chambers and other spaces can be protected for better than 54 million without demolishing more than 200 years of combined architectural history? Yes. And the federal government already knows how to do this. Both The White House and The Pentagon have received well publicized security makeovers decades ago that included bulletproof glass. One security firm says on their website, quote, "Jim Richards, CEO of Total Security Solutions has experience -- experience retrofitting ballistic glass in historic government buildings in and around Washington D.C. He's found that backing existing windows with a second ballistic layer is almost the norm," end quote. The truth is cost. When Joe Biden's predecessor didn't live in The White House, he had the residents in a gaudy, tacky, cheap high-rise at 725 5th Avenue in New York City. The Secret Service are said to have replaced the glass with bulletproof glass. Quote, Lee Mandel, a security expert at IntraLogic Solutions provides some estimates based on his past experience and expertise. "There's bulletproof glass which could be 5 to \$10,000 per window for physical replacement of the glass." If we're to use the high-end of that range \$10,000 to account for inflation since 2016 and divide it into 54 million dollars, the federal government could replace 5,400 in the Dirksen Federal Building with bulletproof glass, in fact, Dirksen has exactly 5,304 panes of glass. 78 windows on the long side, 24 windows on the short side, 204 windows per floors, 26 floors, 5,304. Not only would there be money left over, but replacing these windows with thicker, more energy efficient technologies would actually end up saving the federal government money and follow their commitment to being environmentally responsible. Something that Demolition absolutely is not. The idea to demolish the Century and Consumers Building is shortsighted, and half-baked at best.</p> | |
| 45 | Celine Kosian | General public | | <p>Hi, my name is Celine Kosian. I'm just a resident. I live literally like a block away from these buildings, and I'd just like to say I support adaptive reuse. I think everything should be done to maintain the historical character of this city. I think everyone who lives here knows that -- like, architecture, architectural tours, and the history of Chicago is a big draw to tourism, but also civic pride. I also think that there's a lot of demand for any sort of nonprofit work or any active reuse. The government has \$54 million to demolish these buildings, I feel that could be used in a better way that's more productive, more environmentally friendly, and is better for the residents. I think we should remember this is help to all of Chicago. I appreciate the concerns for the federal buildings, but there are also lots of people that live in The Loop and visit The Loop. So, thank you for your time. And I hope you support adaptive reuse.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |

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| 46 | Brian Hodapp | General public | | <p>Hello, I am a long-time resident of Chicago, and I am passionate about protecting the architectural legacy of the city. The public and I have come out broadly in defense of the Century & Consumers Buildings' historic character, which contributes to the Nation Register of Historic Places Loop Retail Historic District. There are a range of reasons not to demolish these buildings. Postwar urban renewal gotten viable commercial corridors and destroyed neighborhoods. Today, South State Street already has dozens of retail vacancies because of pandemic-era closures. Demolition of the Century & Consumers Building would be bad for business: it would create a void on Chicago's most iconic thoroughfares. The demolition is also bad for the planet. Postwar urban renewal consigned whole neighborhoods to the trash heap, wasting resources and energy. Sending millions more points of the Century & Consumer Buildings' terra cotta, brick, glad and metal into an area landfill would be anti-environmental. It's been contended that the Century & Consumers Buildings "have been vacant and unused for years and have fallen into serious disrepair." Make no mistake - this disrepair is the direct result of the GSA's lack of maintenance and care for the buildings, and not a reason for their demolition. Meanwhile, the GSA has expertly maintained the Dirksen Federal Building, replacing the exterior curtain wall in 2006 and repainting the complex with black paint. The General Services Administration owns an inventory of almost 500 historic buildings, spanning over 200 years of American architectural history. Each of these buildings demands GSA consider design, security and planning surrounding the buildings in concert with the areas surrounding them. It has been argued that the Century & Consumers Buildings are too close to the Dirksen, and that no plan put forth for private redevelopment has addressed the security risk. Yet the Dirksen is within a dense urban core, adjacent to numerous buildings, including 131 S. Dearborn St. and the Monadnock Building at 53 W. Jackson Blvd. How can proximity to these buildings be considered safe and others not? Urban renewal is widely agreed to have been a mistake with devastating consequences that reinforced segregation, increased dependency on the automobile, and wiped whole neighborhoods off the map. Let's not repeat any of these mistakes. If GSA claims that the Dirksen Courthouse is at risk, the GSA should have the expertise and resources to mitigate that risk not by devastating a neighborhood, but by reassessing the safety of the courthouse and seeking a safe private development plan for the Century & Consumers Buildings. This an approach that is completely feasible and cost-effective for the GSA, and preserves the vibrant, dense, commercial core of the city the Dirksen building serves. Sen. Durbin, work to make this, not a gravel put in the heart of the Loop, your legacy.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>GSA's evaluation is informed by the expertise of the U.S. Marshal Service and Federal Protective Service in response to the risks and threats to the Dirksen Courthouse and have thereby established the viable adaptive reuse security criteria to mitigate those security risks. The federal government has analyzed retrofitting the Dirksen Courthouse and determined that certain countermeasures would be infeasible from both a construction and cost consideration. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS.</p> <p>Final EIS Section 3.7.2.1 discusses demolition debris. The demolition debris, without reuse or recycling, would account for approximately 0.23 percent of Chicago's permitted landfill capacity. With reuse and recycling, the amount would be reduced to 0.05 percent of capacity. The solid wastes generated would be an increase from existing conditions but would not exceed the capacity of local landfills. Demolition debris would be managed in accordance with applicable regulations and would be disposed of at appropriately licensed facilities with capacity. The Demolition Alternative would result in a negative, minor to moderate, long-term impact to landfills from the demolition-related solid waste.</p> |
| 47 | Travis Root | General public | | <p>The only responsible and conscionable choices are Alternative B (adaptive reuse) or a No Action Alternative. Alternative A (demolition) is a horrifying prospect, not only for our city's history, architectural legacy, and day-to-day life around that street corner, but also for setting a precedent of just lazily demolishing anything that poses any security issue. Our post-9/11 paranoia must not be allowed to claim another victim-- American freedom is about accepting risks bravely and responsibly, not demolishing our historic architecture out of fear.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |

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| 48 | Alex Bean | General public | | The proposed demolition should not even be under discussion! The Federal government should be the best of neighbors and partners in downtown Chicago, not an absentee landlord wielding a wrecking ball on grounds somewhere between specious and contemptible. Work with the city and local groups on their proposals for restoration and reuse, which can be easily accomplished while still protecting the people who work at the Dirksen Courthouse. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 49 | Anonymous | General public | | I strongly support preserving these important skyscrapers. The Century and Consumers buildings are important examples of Chicago's heritage of skyscraper construction, and it makes far more sense to reuse them than to destroy these buildings and leave a hole in the urban fabric of the loop. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 50 | Rob Rion | General public | | I support Alternative B, Viable Adaptive Reuse. These buildings can be rehabbed and provide security to the nearby courthouse. If the buildings are removed there would be no real possibility of new buildings on this site causing loss of density in the downtown area of Chicago. This should have been done many years ago and rehab is the only actual option. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 51 | Anonymous | General public | | <p>I strongly encourage Alternative B for Viable Adaptive Reuse of the Century and Consumers buildings. These are beautiful and historic buildings that deserve a new life, and should absolutely NOT be demolished over unfounded and unimaginative federal security concerns.</p> <p>Speaking strictly environmentally, it is absurd to even consider demolishing buildings of this magnitude if the federal government wants to feign any care in the present climate crisis at all. Renovation and reuse (Alternative B) is much less damaging to the environment and produces far less waste - this should be the only option being considered by a federal entity in our current moment.</p> <p>In the past, there were proposals to convert to residential that the federal government shot down, and I think they should revisit using these buildings to help address the housing crisis that we in Chicago are currently facing. Security concerns within the courthouse seem a moot point to I think any reasonable citizen (given that the courthouse is situated in one of the densest downtowns in the country and already faced by many, many buildings) but stipulations for redevelopment could easily address them - don't face any windows towards the courthouse, and don't allow tenant access to roofs unless such an outdoor space would be enclosed facing the courthouse and overhead. While I think most people in Chicago would love to see these buildings used in a lively manner for residential or community use and not squandered and forced into desolation by an uninterested and unrepresentative federal entity, even the most barebones usage of these buildings as document or library storage purposes would be vastly preferable to seeing these pieces of architectural history lost forever.</p> <p>Please do NOT demolish the Century and Consumers buildings. Doing so would be a tragic moment for the city of Chicago and would show a federal government actively interested in undermining the interests of the communities which it is supposed to serve. I think the city of Chicago deserves a government ready to move away from the empirically destructive and anti-urban policies of urban renewal and demolition that have plagued the federal government for decades and work towards a more imaginative solution that will bring life to Chicago and its downtown, not destroy it.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>The viable adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks.</p> <p>Constitutional limitations on the government's authority to search and police activities in private residences cause residential use to present significantly greater risk than office or commercial use.</p> <p>GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, defendants and Courthouse staff, federal law enforcement will not release any details on risks to the Dirksen Courthouse.</p> |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 52 | Anonymous | General public | | Support for alternative B, viable for adaptive reuse. Chicago's rich architectural heritage should be upheld and celebrated by federal, state, and city agencies through viable adaptive reuse of the Century and Consumers Building. Adaptive reuse will allow the historic character of State street and the Chicago loop to remain intact. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 53 | Christopher Owen | General public | | I write in full support of adaptive reuse of the buildings located at this address. These buildings are part of the City's architectural heritage - a heritage that has often times been disregarded for no good reason. The adjacent Federal buildings already resulted in the loss of some of the City's architectural gems - particularly the former Federal courthouse building. Demolishing these buildings would only compound the loss. While I understand the security concerns that have been raised, those concerns seem to be exaggerated given the other buildings in close proximity to the Federal buildings where this issue has not been raised. Regardless, I am confident that there are creative solutions that would address any security concerns while allowing these buildings to remain. In short, there is no good reason for these buildings to be demolished. Adaptive reuse should be the default solution here. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse. |
| 54 | Anonymous | General public | | These buildings should NOT be torn down. They should be adapted and reused. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 55 | Christina Peacock | General public | | These buildings should not be torn down - they are historical and architectural gems. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 56 | Anonymous | General public | | The Century and Consumers buildings are a direct reflection of Chicago's place as the birthplace of the skyscraper. Many of the buildings in this area are under review by UNESCO to be potential World Heritage sites. These two buildings absolutely contribute to that heritage. It would be foolish to tear down these buildings based on nebulous "security concerns" and "student safety" issues. Having worked in the building on a Federal Grand Jury for 18 months, it is obvious that many nearby buildings have direct site lines into the Dirksen building. The Century and Consumer buildings were there 50 years before Dirksen was built and they should remain long after Dirksen is replaced. Demolishing these buildings would be a foolish example of security theater and another case of our culture simply tossing out things that are considered "too old." I have not heard a compelling argument for anything that stands to be gained from demolition, but part of our history will certainly be lost. No different than walking past the empty, fenced-off lot that used to be the beautiful Chicago Mercantile Exchange Building, which was demolished 20 years ago. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development. GSA will not release any security information beyond what is in Section 1.3.1 of the Draft EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse. 202 and 220 South State Street are currently not under review by UNESCO for the World Heritage program. In 2017, a preliminary group of nine primarily commercial buildings in Chicago's central business district, the "Loop," were submitted by the U.S. Department of the Interior to the UNESCO World Heritage Tentative List. This means that the proposal is potentially eligible for future nomination by the U.S. Department of the Interior for UNESCO consideration. |
| 57 | Anonymous | General public | | These buildings represent a historically important era of architecture in Chicago, but tearing them down also appears to be a waste of existing resources in our city. Let's invest in rehabilitation and bring the building up to code for energy concerns, showing we have a commitment to preserving our history and defining a sustainable future in this city. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 58 | Anonymous | General public | | <p>It is imperative that these buildings be maintained and restored. They are an important piece of architectural history for the city. I strongly support Alternative B Adaptive re-use for these structures.</p> <p>The arguments for demolition for security reasons seem extremally spurious given the location of the court in a dense urban environment. Many nearby high-rises and rooftops already have sightlines into the federal buildings. With these buildings gone, that would not change. In fact, the court would become more visible from buildings to the east. Additionally, the courthouse already has a great, elegant, and well-suited entrance on Dearborn, and a large plaza within the Federal Center. No additional plazas and entrances are needed or desired on State Street. Demolition of these great buildings would be a poor trade for the public.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development.</p> <p>GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse.</p> <p>If the Demolition Alternative is selected, a flat, ground-level landscaped plaza would be designed to fit in with the overall visual character of the surrounding area and GSA would coordinate the design with the SHPO, City of Chicago, and other consulting parties.</p> |
| 59 | Anonymous | General public | | <p>I OPPOSE the EIS as drafted, because there is not sufficient justification for demolishing the two skyscrapers because of judges desire for lake views. In terms of any security concerns, there is an adaptive reuse plan that meets high security standards that would satisfy those concerns and such there would be no need to demolish the buildings.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>It is not clear what "adaptive reuse plan" the comment is referring to. Viable adaptive reuse options will be considered provided that they satisfy the security needs of the Dirksen Courthouse and are financially viable without federal government assistance.</p> |
| 60 | Blair Rezny | General public | | <p>Please do not tear down these historic buildings. Surely there is another way. Chicago prides itself on its architectural heritage. Tearing these buildings down would be a travesty. Thank you.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |
| 61 | Aedan Hodgson | General public | | <p>These two buildings are part of Chicago. Monday through Friday, as I stand waiting for the bus, I gaze at the two buildings and become saddened and angered by the notion that the federal government wants to demolish these two historic buildings due to "security concerns." It's lazy. It's cowardly. Generally pathetic, perhaps. If someone wanted to commit an act of "terror" against the courthouse--that, may I remind you, is surrounded on all sides by other skyscrapers--they would have done it by now. The safest option--the cheapest, most logical option--is to simply repurpose the buildings (there is already a repurpose plan in place, FYI).</p> <p>I can tell you with absolute certainty that, even if most Chicagoans don't pay attention to the buildings, they will absolutely notice that they are gone.</p> <p>Federal Government: Quite being annoying and spend your money on things that actually matter. Leave our skyscrapers alone.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development.</p> <p>GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse.</p> <p>It is not clear what "repurpose plan" the comment is referring to. Viable adaptive reuse options will be considered provided that they satisfy the security needs of the Dirksen Courthouse and are financially viable without federal government assistance.</p> |
| 62 | Laura Stratford | General public | | <p>As do others, I do not think that the \$52M demolition of two important landmarks is warranted when a high-security adaptive reuse plan is ready to go.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>It is not clear what "adaptive reuse plan" the comment is referring to. Viable adaptive reuse options will be considered providing they satisfy the security needs of the Dirksen Courthouse and are financially viable without federal government assistance.</p> |
| 63 | Anonymous | General public | | <p>Jesus Christ do not demolish those buildings what in the? Seriously what is going through your brains rn?</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |

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| 64 | Anonymous | General public | | <p>I am a federal employee and work in the Federal Building at 77 W Jackson. Our building is about 20 feet from the adjacent building that houses the Union League of Chicago. If these buildings on State Street are a security concern to the Federal Courthouse, is the building adjacent to my office also a security concern? Will it be demolished? If not, are federal employees in my building less important than those who work at the courthouse? Of course these questions are absurd. None of these buildings should be demolished. Downtown Chicago is a place where one must expect buildings next to other buildings. The federal courthouse should find other security mechanisms. Buy some curtains. Install more bollards. If none of that works, relocate the courthouse somewhere else, similar to the FBI compound on Roosevelt. Don't expect to remake the city to suit the court's needs.</p> <p>Setting aside the preceding objections, and focusing strictly on the purposes of this environmental impact statement, it should be crystal clear that demolishing a building in the middle of the Loop will have negative environmental impacts. Buildings have "embodied carbon" -- that is, the amount of CO2, energy, and materials that went into the construction of the building. Demolition would destroy any potential economic or environmental value. The people and businesses that could use that building will, instead find somewhere else. That "somewhere else" is likely to create additional negative environmental impacts. It will almost certainly have less transit access than the State St locations in the middle of the Loop. It might be in a sprawling auto-centric area, perhaps even outside of the city. And any new buildings constructed to replace the existing buildings (on the same site, or elsewhere) would consume more concrete, plastic, CO2, etc. Wasting what we already have to build something new is definitely not good for the environment.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>If the buildings at 202, 214, and 220 South State Street are demolished, the useful life of the building materials would be cut short. If new buildings were to be built, the embodied carbon emissions for the new buildings would significantly outweigh the embodied carbon emissions from viable adaptive reuse. For this project, new buildings would not replace the demolished buildings, therefore demolition would have a negative, negligible, short-term impact on embodied carbon.</p> <p>GSA has not developed a cost estimate of relocating the Dirksen Courthouse any further than what is discussed in Section 2.3.2. The cost would far exceed that of adaptive reuse or demolition of the buildings. Additionally, relocating the Dirksen Courthouse tenants would raise the question of what to do with the Courthouse, which is also a historic building. As noted in Section 1.3.3, GSA has not identified a federal need for the buildings at 202, 214 and 220 South State Street, so therefore finding a federal use for the 1.4 million square foot Dirksen Courthouse would be unlikely.</p> <p>The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development.</p> <p>GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse.</p> |
| 65 | Caroline Wooten | General public | | <p>It is SOOO wasteful to tear down perfectly in tact buildings. Likewise, demolition is a destructive event, and particulate matter will impact people in the surrounding area. Finally, these are BEAUTIFUL buildings. They're part of what give Chicago its character. What would we replace them with? Why would we tear them down</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>Negative, minor, short-term impacts on local air quality and negative, negligible, short-term impacts on regional air quality would occur under the Demolition Alternative. GSA would incorporate Best Management Practices and control measures, such as those described in the EPA's Construction Emission Control Checklist (Appendix D, Agency Correspondence), to control emissions from demolition and construction activities.</p> <p>Demolition is being analyzed as a proposed alternative to address the purpose and need which must address security needs of the Dirksen Courthouse, respond to Congressional Intent in the 2022 Consolidated Appropriations Act, and manage federal assets.</p> <p>GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse.</p> |
| 66 | Anonymous | General public | | <p>Please do not demolish the historic buildings. They offer a unique addition to the urban environment of the Loop.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |
| 67 | Anonymous | General public | | <p>We need viable adaptive reuse! Do not demolish our architectural heritage.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 68 | Andrew Kanwit | General public | | These buildings are an extremely important historical part of the street facing wall along state street. This collection of buildings forms one of the greatest and most renowned shopping districts in the city and country. Tearing down these buildings would put a gaping hole in this important downtown district. And for what? Preserving historic character is essential to keeping Chicago special. Please do not tear down these important beautiful historic buildings and reuse them for something useful. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 69 | Tom Bellino | General public | | I, in addition to all Chicagoans, am immensely proud of the architectural heritage of our great city. The buildings on State Street that the GSA is considering demolishing are an integral part of that legacy. Chicago is the nation's third largest city and, in many ways, is the architectural capital of not just the US, but the world. It would be unconscionable that the federal government might deem our city's proudest feature to be a worthless inconvenience to one powerful person's idea of safety that flies in the face of all logic, reason, and, most importantly, the recent history of the buildings coexisting just fine. Please do not destroy our city's cultural legacy under any circumstances. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 70 | Patrick Grimaldi | General public | | I am strongly in favor of saving these landmark buildings on Chicago's State Street. I've admired them both as a pedestrian when I'm walking by, and while I worked in the Dirksen building. These buildings should be restored and reused instead of being demolished. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 71 | Anonymous | General public | | Please allow us to retain these beautiful historic buildings. I support Alternative B (viable adaptive reuse). | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 72 | Maryellen Schwartz | General public | | Destroying existing historic buildings instead of trying to readapt and reuse is unwarranted. The city's old building have been successfully redeveloped throughout the loop and north side which has resulted in desirable neighborhoods. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 73 | Anonymous | General public | | Demolishing these buildings is a complete waste of money. If security is a real concern then modify the buildings, don't demolish them. Providing federal employees with lakefront views is not a good reason to demolish two skyscrapers in the middle of downtown. Cancel the demolition and use the money to improve CTA service instead. This is a farce. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 74 | Anonymous | General public | | These are beautiful and architecturally significant towers. They add significantly to the aesthetics of the area, and they would also contribute in other ways if they were put to good use rather than being left to rot by the federal government. It would be disastrous to lose them due to a few judges unrealistic concerns about safety. The court's concern about safety is so ridiculous that it makes me wonder if it is their true motivation. The risk posed by these buildings is vastly less than the risk a judge faces every time they step in a car, or eat a steak cooked medium-rare, or walk into a restaurant in which they could catch a disease. These judges do not get to harm the greater public due to absurd paranoia about the risk posed by these buildings. If the judges are really so concerned about the security risk here, perhaps we could build them new underground offices far away from the dangers of the city. Or maybe the unfinished cavern under Block 37 that Mayor Daley built in anticipation of a rail link to O'Hare would make a nice secure home for them. If these options aren't appealing to the judges, it makes one wonder if what they really want is a better view of Lake Michigan. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. GSA has not developed a cost estimate of relocating the Dirksen Courthouse any further than what is discussed in Section 2.3.2. The cost would far exceed that of adaptive reuse or demolition of the buildings. Additionally, relocating the Dirksen Courthouse tenants would raise the question of what to do with the Courthouse, which is also a historic building. As noted in Section 1.3.3, GSA has not identified a federal need for the buildings at 202, 214 and 220 South State Street, so therefore finding a federal use for the 1.4 million square foot Dirksen Courthouse would be unlikely. |

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| 75 | William Reed | General public | | As a proud Chicagoan, public high school STEM teacher, and believer in government for, by, and of the people, I cannot believe that the GSA continues to seriously consider the demolition of these two historic and culturally significant buildings under such little consideration of alternatives and for such apparently petty (lake views for judges) and solved (security at the courthouse building) reasons. Several of my students, a majority of whom are from low income backgrounds, many of whom live in disinvested neighborhoods plagued by gun violence, mental health crises, and poverty, pursue architecture as an extracurricular (and, in some cases, career) interest. This interest comes from a concerted effort by many for profit and non profit organizations (Chicago Architecture Center, ACE Mentor Chicago, TYlin Engineering, and many others) to inspire a love of architecture, design, engineering, and construction among the residents of a city with one of the greatest legacies of modern architecture anywhere in the world. To ignore the importance of historic preservation, especially for such structures that speak to the unique historical development of the skyscraper in Chicago, is to fail to understand the values of the people of this city. We do not need bureaucrats from Washington or Senators from downstate dictating the future of our cityscape. For the sake of young and future generations of Chicagoans who could lose forever these wonderful examples of early 20th century skyscrapers (and for what?) please revisit alternatives and immediately stop the plans to demolish these buildings. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 76 | Anonymous | General public | | The GSA should scrap any plans that include demolition of historic buildings and explore true repairs and security improvements. The loss of historic buildings would be a far greater detriment than any potential or imagined security risks to an already secure building. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 77 | Anonymous | General public | | Alternative 1 (Demolition) is nothing short of an abomination to the city of Chicago and great American architecture as a whole. These significant, historic buildings necessitate Alternative 2 (Adaptive Reuse) in order to preserve the architectural fabric of this city, preserve the historical nature of the Loop, and prevent a blight of empty space. A series of vacant lots in the heart of State Street would stifle the prosperity and growth of the southern portion of the Loop, and send a signal to visitors and developers that Chicago is "Closed for business," promoting a vision of economic downturn not dissimilar to the way that other rust-belt cities are commonly viewed. The notion that an empty lot would be in any way better than these important properties is abhorrent. Furthermore, historic preservation is a vital part of our city's character, and to demolish these existing buildings would send a signal that Chicago (and the federal government) cannot collaborate to save great architecture. It would be a great mistake to demolish these properties. As an architectural designer that works on historic preservation/adaptive reuse projects, I know that Chicago could make great use of these buildings and really send a message that we are a resilient, working city that is proud of our heritage and capable of preserving it. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 78 | Anonymous | General public | | It is simply shocking to me that even a moment's thought is being given to demolishing these lovely buildings. They represent a critical era in the development of the Chicago architectural school and contribute greatly to the architectural heritage of the central loop. The security arguments being advanced are not at all convincing and even from that point of view, the federal government could surely find adaptive reuses for these buildings that would allow them to be secured along with the rest of the federal complex. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 79 | Anonymous | General public | | Under no circumstances should the Century and Consumers Buildings be demolished. These buildings are an important part of the historic character of the Loop, and are irreplaceable. While housing is the ideal choice given the city's need for more of it, using the buildings for document preservation is far superior than demolition, as it avoids the major environmental waste of tearing down the buildings, and keeps the Loop the popular architectural destination that tourists and residents alike love. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 80 | Anonymous | General public | | I do not support the demolition of these buildings. They are part an important architectural history in Chicago and there are better solutions to the problem. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 81 | Anonymous | General public | | I don't believe these buildings should be torn down. I think they're beautiful and contribute to the feel of the city, especially in the Loop where I work. A major draw to coming into the office for me is the feel of the downtown city and feeling like a part of something. Older buildings like this are historic and will only increase in value as they age and more of these beautiful buildings get demolished elsewhere. I love Chicago's history and feel | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 82 | Anonymous | General public | | The architectural and historical significance of the two buildings under threat of demolition is more significant than any short term concerns about security. Other options are available to secure the federal building, rather than a costly and disruptive demo. Please save the buildings! | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 83 | Anonymous | General public | | Adaptive Reuse is the better alternative to these buildings! | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 84 | Ratnika Prasad | General public | | Demolishing these buildings is arbitrary. The creation of a vacant lot in this space will create a dead zone, when these buildings could be adapted for reuse and housing - for which the city has previously received interest. Moreover, these buildings are historical marvels. We urge the GSA to reject this arbitrary and anti democratic, anti housing and anti environmental move and save these building for creative reuse. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 85 | Anonymous | General public | | Do not tear down the landmark buildings. The only reason they want to tear them down is so the judge can have a view of the lake. Unbelievable this is even on the table | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 86 | Anonymous | General public | | It is completely asinine that the demolition of these buildings is even being considered. Concerns about security are ludicrous and could be addressed in a number of less dramatic ways. Downtown Chicago is an urban environment and should remain as such. The courthouse is not in a suburban office park. I urge you to reject the demolition alternative and return the buildings to use. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

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| 87 | Anonymous | General public | | There are 9 sites of original Chicago School buildings in Chicago being proposed as UNESCO World Heritage sites, and I believe the Century and Consumers are direct descendants of the 9 buildings in the proposal. Chicago's architectural and cultural story, from the Chicago School to the present day, is discontinuous without the Century and Consumers. Not to mention the other more immediate deleterious effects of demolition. I believe the Century building, in particular, is singular in its architectural, historical, and civic value. Thus I don't support demolition of this structures. A suitable adaptive reuse should be found that preserve these buildings, the streetscape, and the surrounding urban fabric. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. 202 and 220 South State Street are currently not under review by UNESCO for the World Heritage program. In 2017, a preliminary group of nine primarily commercial buildings in Chicago's central business district, the "Loop," were submitted by the U.S. Department of the Interior to the UNESCO World Heritage Tentative List. This means that the proposal is potentially eligible for future nomination by the U.S. Department of the Interior for UNESCO consideration. |
| 88 | Jacob Alfieri | General public | | I am strongly opposed to Alternative A. This would create a dead zone in the middle of Chicago's central business district. I support Alternative B or ideally a more flexible plan to use these buildings. They predate the Dirksen Federal Building by nearly 50 years and have not caused any issues. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 89 | Anonymous | General public | | I am strongly opposed to alternative A, the proposal to demolish these buildings. I strongly prefer alternative B, adaptive reuse. I live under a mile from this location. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 90 | Nicolas Buitrago | General public | | Strongly support Option B (Adaptive reuse) or No Action. Don't demolish these buildings, why the heck would we waste money demolishing buildings when there's already a housing crisis in Chicago. Don't demolish the buildings obviously. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. Demolition is being analyzed as a proposed alternative to address the purpose and need which must address security needs of the Dirksen Courthouse, respond to Congressional Intent in the 2022 Consolidated Appropriations Act, and manage federal assets. |
| 91 | Alec Schwengler | General public | | It is clear that the Draft EIS is purposely written to support demolition so that judges can have better views of the lake. It is incredibly frustrating to me that the federal government has taken a cultural asset of our city, removed it from the tax rolls and from use, and allowed it to decay to the point of potential demolition. Based on the Draft EIS, it seems that the safety concerns are clearly overblown in order to sway the case for demolition. I do not find the reasons compelling why this building has security concerns but none of the surrounding buildings have similar concerns. Do not tear down our cultural heritage for the sake of a judge's view. I cannot believe this is even being debated. Stop sandbagging this project and save these buildings. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse. |
| 92 | Andrew Benson | General public | | There is no world where tearing down a skyscraper is a better environmental choice than simply installing a curtain. The building should stay. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 93 | David Jameson | General public | | <p>If Chicago is to claim it cares more about architecture than other American city and caters to millions of its architectural tourists, it needs to prove the point by saving its building heritage. A new website about Chicago's architectural history from 1830 to the present day includes these paragraphs:</p> <p>Perhaps the last "Chicago School" construction was Holabird and Roche's skyscraper for Buck & Rayner druggists of 1915-16 renamed "The Century Building" in 1917. John W. Root's son (also called John) had just begun work for the firm and had a major hand in its design.</p> <p>Some historians credit his fascination with Spanish Manueline architecture for its more vertical elevation but, in any case, the 42-foot width (and 101-foot depth) may have been his impetus for the design of the skinny 16-story building verging on Art Déco.</p> <p>Now that we have lost many of our Louis Sullivan buildings, it's critical that we give the hoards of tourists something to see.</p> | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 94 | Hugh Iglarsh | General public | | <p>The buildings in question have both historic and aesthetic value. They are a vital part of the State Street streetscape, and it would be an act of vandalism to tear them down in order to prevent imaginary acts of terrorism. Simply by blocking out certain windows, the buildings could be rendered quite safe. If the courthouse is so threatened by the mere presence of other buildings that long predate it, it should be torn down, rebuilt in the suburbs or countryside and surrounded by a crocodile-filled moat or minefield. Just the fact that this crazy suggestion of tearing down the old skyscrapers is taken seriously shows that we have become a nation of frightened ninnyes. Shame on you, Sen. Durbin.</p> | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. GSA has not developed a cost estimate of relocating the Dirksen Courthouse any further than what is discussed in Section 2.3.2. The cost would far exceed that of adaptive reuse or demolition of the buildings. Additionally, relocating the Dirksen Courthouse tenants would raise the question of what to do with the Courthouse, which is also a historic building. As noted in Section 1.3.3, GSA has not identified a federal need for the buildings at 202, 214 and 220 South State Street, so therefore finding a federal use for the 1.4 million square foot Dirksen Courthouse would be unlikely. |
| 95 | Anonymous | General public | | <p>These two structures should remain intact and be sold for private development/refurbishment.</p> | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 96 | Anonymous | General public | | <p>please rehab these into housing instead of tearing them down, we desperately need more housing</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>The adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks.</p> <p>Constitutional limitations on the government's authority to search and police activities in private residences cause residential use to present significantly greater risk than office or commercial use.</p> <p>GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, defendants and Courthouse staff, federal law enforcement will not release any details on risks to the Dirksen Courthouse.</p> |
| 97 | Anonymous | General public | | <p>Demolishing these buildings is unacceptable. Find a way to preserve them and protect federal employees at the same time even if it's just converting the buildings to federal office space.</p> | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 98 | Lucas Brandt | General public | | <p>We invested lots of energy and carbon into building these beautiful buildings. It would be a total waste, and obvious stupidity, to tear them down. Don't tear down perfectly usable buildings for no reason.</p> | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 99 | Andrew Corzo | General public | | <p>Please do not demolish the buildings. They can and should be adaptively reused such that all security concerns from the courthouse can be assuaged. Those buildings are fine examples of Chicago architectural history and they existed for decades without any of the current concerns coming to fruition.</p> | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 100 | Heather Parker | General public | | Please find a way to keep 220 South State Street without demolishing it. Lots of square footage right there would be convenient to make housing. Demolishing and rebuilding would have a big impact on wasted resources. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. The adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks. Constitutional limitations on the government's authority to search and police activities in private residences cause residential use to present significantly greater risk than office or commercial use. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, defendants and Courthouse staff, federal law enforcement will not release any details on risks to the Dirksen Courthouse. |
| 101 | Sean Haran | General public | | I think it is ridiculous that this demolition is even being considered. The security threats are not credible to say the least and the building is architecturally exquisite. Furthermore, the demolition of these buildings will create a "dead-zone" in an area that is already struggling. Instead, these skyscrapers should be reused and converted into apartments and commercial space. Doing so would get rid of any security threat without having an extremely adverse effect on the surrounding environment. It would also help add pedestrian traffic to State Street, something that is crucial to its recovery from the pandemic. Please save this building from demolition! | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 102 | Anonymous | General public | | Demolition of these two buildings would be a baffling decision by the GSA. These beautiful structures have stood in their current location for decades now - long before the adjacent federal complex was ever constructed - and they have continued to exist and remain occupied for years afterward, without incident. Leveling half a block of historic architecture for theoretical security concerns is incredibly short-sighted and inexcusable. Relocate the federal complex to an empty field somewhere if you're so worried about having neighbors. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. GSA has not developed a cost estimate of relocating the Dirksen Courthouse any further than what is discussed in Section 2.3.2. The cost would far exceed that of adaptive reuse or demolition of the buildings. Additionally, relocating the Dirksen Courthouse tenants would raise the question of what to do with the Courthouse, which is also a historic building. As noted in Section 1.3.3, GSA has not identified a federal need for the buildings at 202, 214 and 220 South State Street, so therefore finding a federal use for the 1.4 million square foot Dirksen Courthouse would be unlikely. |
| 103 | Anonymous | General public | | I am writing in support of rehabbing and adapting the historic skyscrapers for future generations. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 104 | Mark Burger | General public | | Preserving the present buildings is not a knee jerk NIMBY reaction to change. These are already sufficiently sized buildings for the Chicago Loop. Even with significant rehabilitation costs, saving the buildings would reduce time and embodied energy, plus maintains the inherent character of the area. We don't need more sterile glass towers in the Loop, as much as incumbent decision makers would like that soul deadening process to continue. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

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| 105 | Andrew Hickner | General public | | <p>I oppose Demolition (Alternative A). GSA's proposal to demolish these historic buildings is stupid and unnecessary; the concerns of the . Ideally, they should be turned into apartments as previously proposed in 2017. If Alternative B is selected, restriction #2 (Occupancy/use) should be modified to allow residential or lodging. Please see this article for more information: https://slate.com/business/2022/05/chicago-consumers-century-buildings-dirkson-courthouse-durbin.html. Key excerpts:</p> <p>"There's also the question of what happens once the site is a vacant plot of "secure" landscaping: The Dirksen is 90 feet away, but it is not much further to neighboring structures including the Monadnock Building, one of America's finest early skyscrapers. "The difference between 75, 100, or 200 feet for a rifle is none," said Atlas, the architect and security consultant</p> <p>"It is also not clear why the standards being applied to the Dirksen are not relevant to the country's other federal courts. Virtually every city has a downtown courthouse surrounded by offices, hotels, and apartment buildings."</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>Constitutional limitations on the government's authority to search and police activities in private residences cause residential use to present significantly greater risk than office or commercial use.</p> <p>The viable adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks. GSA began the charrette process in Fall 2023 to facilitate consulting parties working collaboratively with building design professionals to brainstorm ideas to enhance the viability of adaptive reuse.</p> <p>The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development. GSA will not release any security information beyond what is in Section 1.3.1 of the Draft EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse.</p> |
| 106 | Anonymous | General public | | <p>Thank you for the comprehensive review provided in the EIS. 202, 204, and 220 S State St are located in a stretch of the Loop that is critical for the success of Chicago's downtown, and activating these lots has the potential to re-invigorate a stretch of Michigan Avenue long-plagued with diminishing occupancy.</p> <p>Retail vacancy rates in the central Loop, which includes State Street, rose to 27% in 2023, a record high. Office vacancy throughout the loop averages 20%, but is mostly concentrated in inner-loop, vintage buildings. The proliferation of remote work has resulted in diminished demand for office space, and has resulted in more space than ever sitting unused in Chicago's downtown. I personally work with Loop office buildings and have seen how the leasing market has degraded while taxes, maintenance, and staffing costs have risen. The economics of running a well-maintained vintage office property in the Chicago loop are extremely challenging, and are likely to stay that way.</p> <p>These buildings have fallen into a state of disrepair. The scaffolding and graffiti outside are at best uninviting, and at worst give cover to vagrancy. The dead space on State Street creates a menacing atmosphere and detracts from the city's goals of a vibrant, engaging streetscape.</p> <p>Inside, the properties face millions of dollars of capital costs necessary to restore the offices to working condition. This, combined with the costs and restrictions laid out in the EIS - no conversion to residential housing allowed, no sightlines into the Dirksen Courthouse allowed, no parking on premise, and mandatory staffing of 24-hours security at developer's expense - render the proposal to restore the buildings economically infeasible.</p> <p>The committee must consider what best serves both the court's needs and the needs of the residents of Chicago. Downtown Chicago would be best served by the creation of a public plaza with additional low-rise retail and dining options that helps create an inviting, vibrant streetscape. The best option for the court and the people of Chicago is to demolish these long-neglected eyesores and finally allow these parcels to be adopted into space that adds to downtown, instead of detracts from it.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 107 | Tommy Hoyt | General public | | I support tearing down the vacant buildings on North State Street. At present, these buildings are unsafe and unsightly. Their condition will only deteriorate if left standing—posing an ever greater risk to the community. This district suffers from high vacancy and depressed foot traffic. It will benefit by converting these parcels into green space and/or well-lit public amenities. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 108 | Anonymous | General public | | At a time when the future of the State St corridor is at such an inflection point, the last thing the community needs is a large vacant lot or low-density development. To tear these buildings down would be harmful to the neighborhood, and the city, eliminating two historically significant structures for no good reason. Workable solutions are surely possible to revitalize both buildings while preserving the security of the adjacent courthouse. Such alternatives have been presented. The only reason put forward to tear these buildings down are to improve views for the adjacent court house which is as far from a legitimate reason as one can get. In sum, tearing these buildings down would harm the neighborhood by creating a gap in an already struggling street scape, and would serve no real purpose. Alternatively, repurposing both buildings could act as a n anchor to help the entire neighborhood while preserving security for the adjacent buildings. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 109 | Anonymous | General public | | I'm in support of saving these buildings from being torn down. We must preserve our history and Chicago can't afford to have dead zones in the middle of the Loop, especially with the Loop suffering to regain full vibrancy since the start of the Covid-19 pandemic. If there is a security concern for a particular federal building, maybe the answer is to move the security-sensitive functions out of these buildings instead of "eliminating the threat" through the ridiculous idea of tearing down gorgeous, historic, visually unique buildings. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. GSA has not developed a cost estimate of relocating the Dirksen Courthouse any further than what is discussed in Section 2.3.2. The cost would far exceed that of adaptive reuse or demolition of the buildings. Additionally, relocating the Dirksen Courthouse tenants would raise the question of what to do with the Courthouse, which is also a historic building. As noted in Section 1.3.3, GSA has not identified a federal need for the buildings at 202, 214 and 220 South State Street, so therefore finding a federal use for the 1.4 million square foot Dirksen Courthouse would be unlikely. |
| 110 | Anonymous | General public | | Don't tear these buildings down! Rehab! | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

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| 111 | Colin Young | General public | | We cannot demolish historic buildings on State Street and expect the street corner, previously one of the most vibrant in the world, to thrive. Security concerns are ridiculous and regardless, the federal building should relocate if it's such a problem. Further, demolition and rebuilding another building will mean more embodied carbon emissions, which of course has an impact on the environment. Please refurbish these buildings into affordable housing to bring residents and vitality to State Street. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. The viable adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks. Constitutional limitations on the government's authority to search and police activities in private residences cause residential use to present significantly greater risk than office or commercial use. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, defendants and Courthouse staff, federal law enforcement will not release any details on risks to the Dirksen Courthouse. If the buildings at 202, 214, and 220 South State Street are demolished, the useful life of the building materials would be cut short. If new buildings were to be built, the embodied carbon emissions for the new buildings would significantly outweigh the embodied carbon emissions from viable adaptive reuse. For this project, new buildings would not replace the demolished buildings, therefore demolition would have a negative, negligible, short-term impact on embodied carbon. GSA has not developed a cost estimate of relocating the Dirksen Courthouse any further than what is discussed in Section 2.3.2. The cost would far exceed that of adaptive reuse or demolition of the buildings. Additionally, relocating the Dirksen Courthouse tenants would raise the question of what to do with the Courthouse, which is also a historic building. As noted in Section 1.3.3, GSA has not identified a federal need for the buildings at 202, 214 and 220 South State Street, so therefore finding a federal use for the 1.4 million square foot Dirksen Courthouse would be unlikely. |
| 112 | Anonymous | General public | | We need not destroy buildings from our past. Perhaps another issue is at hand leading to terrible security concerns. What did the buildings do to deserve this? | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 113 | Anonymous | General public | | The Loop is admittedly going through a tough time right now. The answer is to keep these beautiful buildings, and turn them into something useful, such as the proposed plan to rehab them into downtown housing units! More people downtown = more life downtown. House people in the neighborhood and watch it thrive. And keep the buildings that help make downtown Chicago so gorgeous to walk around! As Lee Bey eloquently stated, "The building's demolition would create an economic and pedestrian dead zone on State Street, something neither the street nor the city can afford. And it would be a shameful waste of some really good Chicago architecture." | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. The adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks. Constitutional limitations on the government's authority to search and police activities in private residences cause residential use to present significantly greater risk than office or commercial use. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, defendants and Courthouse staff, federal law enforcement will not release any details on risks to the Dirksen Courthouse. |
| 114 | Jennifer Ketay Brock | General public | | Today, I write to ask you not to demolish Chicago's Century and Consumers Buildings. As two iconic early skyscrapers in downtown Chicago's historic district, the Century and Consumers Buildings contribute to the architectural significance of the Loop. Architecture firms Jenney, Mundie & Jensen designed the Consumers Building in 1913, and Holabird & Roche designed the Century Building in 1915. As you continue federally mandated reviews to weigh options for the Century and Consumers Buildings, I ask that you work with all parties to identify a preservation-based reuse that also meets security needs in order to avoid these places' wasteful demolition. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

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| 115 | Tom Weber | General public | | I am writing as part of the Draft EIS process to advocate on behalf of the Century and Consumers buildings. My strong advocacy for Alternative B: Viable Adaptive Reuse is due to: 1. The city of Chicago and the Federal Government failed to be good partners during the CA Ventures residential proposal for the buildings several years ago, and the same mistakes should not be repeated with viable reuse proposals such as the Chicago Collaborative Archive's Center. 2. The current disrepair of the buildings is noted as a reason for demolition, despite the fact that the disrepair and abandonment is due to several decades of purposeful inaction following the Federal Government eminent domain takeover. 3. Instead of working to acquire real estate for unnecessary security buffer zones, the Federal Government should increase efforts on renovating their buildings to help resolve security concerns through increased window opacity and glass strength if they wish to maintain a presence in dense downtown areas. 4. Both skyscrapers are architecturally significant to State Street and the Chicago Loop. As a society we should apply lessons learned from architectural and urban planning mistakes in the past half century instead of repeating them in the future. 5. As large cities like Chicago cement the future of their downtowns in a post-pandemic world, the Federal government needs to be a partner advocating for innovation and reuse instead of demolition that hurts overall density, street life, and economic recovery. Both buildings were active with commercial and retail tenants prior to being purposefully shuttered, and that unnecessary action has cast a dead zone over this part of State Street in the years since. 6. There are already an abundant number of underutilized public plazas within walking distance of this site such as Pritzker Park, Federal Plaza, Chase Plaza, and Daley Plaza. There is no benefit to the Chicago Loop by having historically significant buildings destroyed to create yet another plaza. I hope common sense prevails and Alternative B: Viable Adaptive Reuse is put into action for the Century and Consumers buildings. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. GSA's evaluation is informed by the expertise of the U.S. Marshal Service and Federal Protective Service in response to the risks and threats to the Dirksen Courthouse and have thereby established the viable adaptive security criteria to mitigate those security risks. The federal government has analyzed retrofitting the Dirksen Courthouse and determined that certain countermeasures would be infeasible from both a construction and cost consideration. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. John Lasky Architects, on behalf of GSA, produced Building Preservation Plan reports for 202 and 220 South State Street in 2009, shortly after GSA acquired the buildings. The Building Preservation Plan states that 202 South State Street has shown signs of deterioration since 1934. It was cited as one of 1,100 buildings in a state of dangerous disrepair in a 1974 survey ordered by the City of Chicago. In 1984, a section of terra cotta broke loose from the building, falling 100 feet and critically injuring a woman. The plan states that the first floor of 202 South State Street existed in a deteriorated state, the upper floors were mostly deteriorated and largely gutted, mechanical systems have been removed or were non-operational, and the building had overall poor exterior integrity. The Building Preservation Plan for 220 South State Street reported that the building was generally in good structural and exterior integrity but was found to be uninhabitable/unmarketable due to significant fire protection/life safety/safety deficiencies and asbestos-containing materials and lead-based paint found in several areas. Alterations from over the years have changed elements of the building beyond original recognition. |
| 116 | Conor McNamara | General public | | Do you all think we are fucking morons? The two buildings on state provide 0 security risk. Put up curtains if the danger is that high. This is insulting. DO NOT TEAR DOWN THE BUILDINGS | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 117 | Anonymous | General public | | I read that to tear the buildings down will have a negative impact environmentally. It also will make State Street much less interesting visually. In contrast, to turn the buildings into affordable housing will bring vibrancy to the central city and is a great use of federal money and a great way to role model how the government should work. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. The viable adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks. Constitutional limitations on the government's authority to search and police activities in private residences cause residential use to present significantly greater risk than office or commercial use. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, defendants and Courthouse staff, federal law enforcement will not release any details on risks to the Dirksen Courthouse. |

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| 118 | Aaron Brown | General public | | <p>I strongly oppose the proposal to demolish these invaluable buildings and am aghast that the federal government would even consider it.</p> <p>As a Chicagoan, I believe that two things that make our city great are (a) our dense, active downtown and (b) our architectural heritage. This demolition would strike at both, putting the security state (and vastly overblown security concerns) in front of the lives of everyday Chicagoans who will need to live with a dead space in the middle of a vibrant downtown.</p> <p>There are plenty of other options here - including The Chicago Collaborative Archive Center - that would meet the security criteria while preserving these buildings, at the same or lower cost. Shame on the GSA for even considering this demolition.</p> <p>I hope the legislators who purport to speak for the citizens of Chicago will step up here</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>GSA's Preferred Alternative is Viable Adaptive Reuse and GSA welcomes input from all groups to develop a viable reuse alternative.</p> |
| 119 | Anonymous | General public | | <p>ALTERNATIVE B!</p> <p>The fact the feds are considering tearing these buildings down is despicable. If judges chambers are so important then put up a damned curtain, DO NOT tear down our shared heritage. The fact I even have to write this is sad</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |
| 120 | Anonymous | General public | | <p>I think we need to save historic buildings. This could be a big draw to the area. The court can figure out its own security issues</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |
| 121 | Anonymous | General public | | <p>Please find a way to re-purpose rather than demolish the two buildings at State & Adams in Chicago, IL. This would be highly preferable for environmental reasons to avoid the waste from the buildings and the need for new materials, and historically to preserve these gems of Chicago architecture.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>Final EIS Section 3.7.2.1 discusses demolition debris. The demolition debris, without reuse or recycling, would account for approximately 0.23 percent of Chicago's permitted landfill capacity. With reuse and recycling, the amount would be reduced to 0.05 percent of capacity. The solid wastes generated would be an increase from existing conditions but would not exceed the capacity of local landfills. Demolition debris would be managed in accordance with applicable regulations and would be disposed of at appropriately licensed facilities with capacity. The Demolition Alternative would result in a negative, minor to moderate, long-term impact to landfills from the demolition-related solid waste.</p> |
| 122 | Anonymous | General public | | <p>Please save our beautiful buildings and history!</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 123 | Nithin Philips | General public | | <p>As a resident of the City of Chicago, I support Viable Adaptive Reuse (Alternative B) proposed in the EIS with some caveats.</p> <p>A dense, populated (with people and buildings) and welcoming downtown is essential to the future of Chicago. As GSA must know very well, the city is currently facing changing economic conditions regarding the use of the downtown and it is critical that any changes made will stabilize the area economically and ensure a prosperous future for the city and the downtown area.</p> <p>A downtown lot that is vacant or used for the storage of cars is not useful to the citizens of the Chicago. It appears that GSA does not have the funds to repair and keep these buildings in good condition, and it then follows that GSA does not have the funds to build another structure at this location that would meet the security conditions that are placed upon these sites. Further, it may be difficult to find a developer willing to work with all the restrictions without having to pay costly incentives, which are again currently unfunded. So, in effect, what we are being offered is several vacant lots for the foreseeable future. I echo the sentiment from Kevin Harrington from IIT that the Federal Government's stipulations for adaptive reuse is draconian and is presented simply there to justify the decision to demolish these building anyways and make the government appear reasonable.</p> <p>These concerns do not even begin to address the loss these historic and beautiful buildings will have on the downtown skyline.</p> <p>The GSA and the Federal Government can and must do better. GSA should consider the impact of their decisions on the vibrancy and the future of downtown Chicago and should strive to make a fair and prudent decision, not the most expedient one. Please work with the local experts and stakeholders (and consider their feedback) to ensure that the security of the courts, preservation and the future economic prospects of the city are all given due consideration.</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>The viable adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks. GSA began the charrette process in Fall 2023 to facilitate consulting parties working collaboratively with building design professionals to brainstorm ideas to enhance the viability of adaptive reuse.</p> <p>If the Demolition Alternative is selected, a flat, ground-level landscaped plaza would be designed to fit in with the overall visual character of the surrounding area and GSA would coordinate the design with the SHPO, City of Chicago, and other consulting parties.</p> |
| 124 | Lee Brown, FAICP | General public | | <p>The Draft Environmental Impact Statement must be rejected and rewritten to eliminate its fundamental flaws. The DEIS is prejudiced and presents a false trichotomy: 1. Do nothing (an alternative required by NEPA, but allows GSA to continue to be a malevolent property-owner intent on the elimination of the buildings); 2. Adaptive reuse, but limited by unreasonable self-imposed restrictions; or, 3. Demolition (GSA's irreverent preferred choice.)</p> <p>The DEIS suggests that the threat to Federal properties demonstrated by the events of 9/11, and later a site specific threat on the Dirksen Courthouse in 2005 was GSA's original motivation for eminent domain acquisition of the subject buildings along with other property between Adams and Jackson Streets beginning in 2005 and completed in 2007. The DEIS states: "The goal of acquiring these proximate parcels of land was to "allow GSA to improve security by enhancing its ability to control access to the parking ramp leading into the Dirksen Courthouse," to "provide greater control of Quincy Court . . . and allow GSA to create a buffer zone integral to the security of the courthouse," and to "increase security by eliminating the possibility of private sector development proximate to the Dirksen Courthouse." The DEIS also states: "Federal law enforcement agencies extensively studied and determined that the buildings pose a specific and significant security threat to the Dirksen Courthouse (ATF 2017, 2020; FBI 2018; U.S. District Court Northern District of Illinois 2018; Administrative Office the U.S. Courts and USMS, n.d.). Note that these "studies" of the threat were</p> | <p>All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS.</p> <p>The viable adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks. GSA began the charrette process in Fall 2023 to facilitate consulting parties working collaboratively with building design professionals to brainstorm ideas to enhance the viability of adaptive reuse.</p> <p>The U.S. Marshals and Federal Protective Service are aware of security risks imposed by other buildings, including sightlines to the Dirksen Courthouse. Other nearby buildings are non-residential, and therefore do not hold the increased risk identified from residential development. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse.</p> <p>The decline in need for federal office space after the acquisition of the buildings is explained in Section 1.3.3 of the Final EIS.</p> <p>GSA's Preferred Alternative is Viable Adaptive Reuse and GSA welcomes input from all groups to develop a viable reuse alternative.</p> |

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| | | | | <p>conducted 12-15 years after the initial eminent domain acquisition of the subject properties aimed at security threats, not before the commitment of funds for acquisitions. By dismissing retrofitting the Dirksen Courthouse as "...cost prohibitive or not possible..." GSA does not present a full and fair discussion of significant environmental impacts of what experts in architecture and construction consider a reasonable alternative from being compared to alternatives the agency prefers, and does not provide evidence that the Agency has conducted the necessary environmental analysis.</p> <p>The public purpose of that eminent domain did not anticipate demolition for purposes of creating a public open space as in now contemplated. GSA officials had at the time of acquisition expressed the intent to use the buildings as an extension of its Federal campus in conjunction with security improvements. At first, only the building at 230 S. State was renovated and occupied for Federal Offices. For reasons not explained, the need for Federal office space had declined soon after the acquisition of the subject property, and the GSA began to explore its alternatives. By 2010, recognizing the significant historic value of the buildings, the GSA began discussions with local historic preservation agencies and experts concerning adaptive reuse. During the period of GSA's ownership, the subject buildings have been unoccupied and have been allowed to decay to the point that the GSA began to deconstruct portions of the building they deem to be a safety threat. The Agency also sought and received an appropriation of \$52 Million in 2022 for the express purpose of demolishing the structures, prior to the preparation of a Draft Environmental Impact Statement examining the alternatives to demolition. If not a direct violation of NEPA, (see 40 CFR 1502.2 (f) "Agencies shall not commit resources prejudicing selection of alternatives before making a final decision"; and 40 CFR 1502.2 (g) "Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made.") then these funds further evidence GSA's negligent "maintenance" that advanced it's desire to justify demolition.</p> <p>Through personal knowledge and journal reports, the City of Chicago actively sought the reuse of these properties through the issuance of an RFP which collected legitimate private interest and rational proposals from qualified developers. It was reported at the time that these efforts were rebuffed by the GSA in response to a Federal judge who was concerned due to the proposals inclusion of rooftop deck and accessible windows facing the courthouse. This arbitrary restriction ignores the fact that there are multiple privately owned buildings with proximity and visibility of the courthouse and the access to the parking under the courthouse which have rooftop decks and in some cases accessible windows which, without the hardening and protection of the Dirksen Courthouse itself will continue to pose a threat irrespective of the subject properties. As such, the ultimate disposition of these properties must be considered in addition to hardening of the courthouse, not in lieu of hardening the courthouse. If the subject properties are demolished as is GSA's preference, it will directly expose the eastern side of the Dirksen Courthouse to other buildings and rooftops east of State Street. How many more buildings will the GSA need to condemn to protect its flanks?</p> <p>The GSA's introduction of "viable adaptive reuse" restrictions to occupancy by</p> | |

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| | | | | <p>“...residential or lodging, places of worship or medical treatment, services, or research” are not determinative of Courthouse safety or security. There are many examples of these prohibited uses which have at least one blank wall and no rooftop access for occupants, making them just as safe and viable as uses not prohibited in this list. This is GSA’s attempt to blame the symptoms not the cause. It also prejudices the DEIS and fundamentally undermines the potential for rational, secure and viable reuse of the structures. Despite these arbitrary restrictions, experts, developers, and non-for-profit entities with an interest in historic preservation assembled a legitimate proposal to reuse the property for a “Chicago Collaborative Archive Center”.</p> <p>As stated above, the DEIS is founded on a false trichotomy. Instead, a legitimate EIS should evaluate four alternatives:</p> <ol style="list-style-type: none"> 1. Harden the Dirksen Courthouse against terrorism 2. Make the properties available for adaptive reuse (with specific security outcomes, not limitations to occupancies that stifle legitimate marketable reuse.) 3. Demolition 4. Do nothing other than maintain the buildings <p>Census data shows that since the year 2000, Chicago’s central business district has had the largest population growth within the CBD of the 10 largest US cities. This is an astounding 213% increase. I contributed to that increase when I purchased a home and moved to within 900 ft of the Dirksen Courthouse and the subject properties. I walk past the site regularly on my way to shop and pickup groceries in the South Loop. The daytime population of the CBD has changed over the last 5 years, first by the increasing resident population, followed by the exodus of office workers to their suburban work-from-home offices during the pandemic, and after the peak of the pandemic the return of tourism. Hotels, parking structures, and Chicago Architecture Foundation walking tours are fully occupied as a direct result of cultural tourism. It is rare now not to encounter a walking tour within the historic districts or in front of an historic building. GSA’s proposal to demolish the subject property would contribute to the loss of cultural and architectural history that draws in tourism revenue, and would diminish the sense of vitality within the State Street corridor. GSA’s callous disregard for alternatives that meet both the needs of public and courthouse safety and the importance of historic preservation and cultural resources makes a mockery of both NEPA and the National Historic Preservation Act.</p> | |
| 125 | Anonymous | General public | | As President of the Chicago Chapter of the Society of Architectural Historians, I am urging you to save the State Street buildings. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 126 | Liz Peloso | Government agency | EPA Region 5 | I am the lead NEPA reviewer for the DEIS for The Buildings at 202, 214, and 220 South State Street. We were expecting the DEIS to identify a preferred alternative, but the document did not identify one. 40 CFR Section 1502.14(e) requires the section on alternatives in an EIS to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement..." If a lead Federal agency has a preferred alternative at the Draft EIS stage, that alternative must be labeled or identified as such in the Draft EIS. If the lead Federal agency has no preferred alternative at the Draft EIS stage, a preferred alternative need not be identified there. However, it is expected that a DEIS would be clear on which was the case. If GSA at this point in the NEPA review has not identified a preferred alternative, the DEIS should have been clear on that. Can you please clarify if there is a Preferred Alternative at this time, and if yes, what the Preferred Alternative is? Alternately, if there is not a Preferred Alternative at this time, can you please confirm as much? | At the time of publication of the Draft EIS, GSA did not have a Preferred Alternative. Section 2.5 of the Final EIS states that GSA's Preferred Alternative is Viable Adaptive Reuse (Alternative B). |
| 127 | Valincia Darby | Government agency | Department of the Interior, OEPC, Philadelphia Region | The U.S. Department of the Interior (Department) has reviewed the subject Draft Environmental Impact Statement for the proposed project. The Department does not have comments at this time. Thank you for the opportunity to comment. | Thank you for your comment. |
| 128 | Liz Peloso | Government agency | EPA Region 5 | [Refer to Appendix I of the Public Hearing Summary Report on GSA's website for the full letter sent by the EPA providing their comments.] | Refer to Table H-2 for responses to EPA comments. |
| 129 | Jake Swenson | General public | | I sent a lengthy letter during the last round of comments, so I'll keep this brief. I just want to reiterate my support for adaptive reuse of the Century and Consumers buildings. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 130 | Mary Lu Seidel, Ward Miller, Holly Fiedler | Non-federal agency stakeholder | Preservation Chicago and Chicago Collaborative Archive Center | [Refer to Appendix I of the Public Hearing Summary Report on GSA's website for the full letter sent by the Chicago Collaborative Archive Center in response to the Draft EIS.] | Refer to Table H-3 for responses to CCAC comments. |
| 131-525 | Repeated comment sent 395 times by 394 people via email | General public | | Today, I write to ask you not to demolish Chicago's Century and Consumers Buildings. As two iconic early skyscrapers in downtown Chicago's historic district, the Century and Consumers Buildings contribute to the architectural significance of the Loop. Architecture firms Jenney, Mundie & Jensen designed the Consumers Building in 1913, and Holabird & Roche designed the Century Building in 1915. As you continue federally mandated reviews to weigh options for the Century and Consumers Buildings, I ask that you work with all parties to identify a preservation-based reuse that also meets security needs in order to avoid these places' wasteful demolition. | All comments opposing or supporting a particular alternative are noted, included in the administrative record, and taken into consideration when preparing the Final EIS. |
| 526 | Kandalyn Hahn | Non-federal agency stakeholder | City of Chicago Department of Planning and Development | <u>Draft EIS Edits</u> City of Chicago Department of Planning & Development (DPD) staff provided comments at the November 10, 2022, NEPA/GSA scoping meeting. DPD should be included in the list of non-federal agency stakeholders who provided comments at this meeting on pages ES-10 and 1-11. <u>Significance of the Lower Floors of the 202-220 South State Street Buildings</u> | The City of Chicago Department of Planning & Development has been added to the list of non-federal agency stakeholders on page 1-11 of the Final EIS who provided comments at the scoping meeting on November 10, 2022. Thank you for your comment providing detailed information about the buildings. 202 and 220 South State Street are listed in the National Register and 214 has been determined eligible for the National Register, and their architectural significance is acknowledged. Additional discussion of eligibility does not add relevance to the |

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| | | | Historic Preservation Division | <p>Draft EIS discussion of the Century Building (202 South State Street) omitted the significance of the 1951-1952 remodeling of the first and second floor exteriors. The Century Building's dramatic, floor-to-ceiling, curving-plate-glass storefront trimmed in stainless steel is an example par excellence of the International Style "open front" storefront which prioritized views into buildings such that the interior commercial space became the display. Their preservation is all the more important due to the rare survival of such mid-century designs. Of the six International Style structures included in the 1998 National Register-listed Loop Retail Historic District, one has been demolished, four buildings' storefronts have been entirely remodeled, and only the Century Building's storefront remains intact. (The Commission on Chicago Landmarks' preliminary summary of information for the Century Building discussing this is attached.)</p> <p>Likewise, the special significance of the marble-clad, classically detailed vestibule and lobby of the Consumers Building (220 South State Street) was not discussed in the draft EIS. The Consumer Building's vestibule and lobby look much like they did when the structure was completed in 1913. As such, they are especially noteworthy as a rare surviving example of an early twentieth-century professional office building vestibule and lobby in Chicago. Staff know of no other equivalent, extant 1910s vestibule and lobby in the Loop. (The Commission on Chicago Landmarks' preliminary summary of information for the Consumers Building discussing this is attached.)</p> <p>Finally, although the 214 South State Street building is not being considered for landmark status by the City of Chicago, it is also worth stating that staff know of no other intact Modeme-style retail storefronts remaining in the Loop. The loss of these three buildings' lower floors would erase permanently these last-surviving connections to the pedestrian-level experience of State Street's history in the different phases of the early twentieth century.</p> <p><u>Local Impact</u></p> <p>As noted in the draft EIS, the Commission on Chicago Landmarks voted to preliminarily landmark the Century Building (202 South State Street) and the Consumers Building (220 South State Street) at its April 13, 2023, regular monthly meeting. The Commissioner of the Department of Planning & Development submitted the attached report recommending landmark designation to the Commission at its May 4, 2023, meeting. As the Government Services Administration (GSA) has not consented to the designation, a public hearing is scheduled for November 13, 2023, which will allow the Commission to hear any additional evidence with regard to the proposed designation that should be considered when the final landmark designation recommendation is included on their agenda for a vote.</p> <p>The Commission did not undertake this step lightly and gave time to allow the Section 106 process to unfold to better understand the security vulnerabilities asserted by the federal government for the Dirksen U.S. Courthouse. Designation ordinances were crafted with additional guidelines which would allow for the flexibility which may be needed to accommodate GSA's 15 reuse criteria for the Century and Consumers Buildings which were developed in collaboration with the United States District Court, Northern District of Illinois, and federal law enforcement agencies.</p> <p>The proposed designations reflect the level of significance of these structures within the Loop and the larger city in architectural and historical terms, but also in the</p> | <p>assessment.</p> <p>Although the U.S. Government is not legally bound to any obligations attendant to landmark designation, GSA addressed this in an official letter sent in response to the Commission on Chicago Landmarks regarding the proposed Preliminary Landmark Recommendation for the Century and Consumers buildings on April 13, 2023. The letter stated "GSA has long acknowledged the historic and architectural significance of these historic properties. We recognize that these two buildings are identified as contributing properties, under Criteria A and C at the local level of significance, to the National Register of Historic Places-listed, Loop Retail Historic District. As such, local significance is acknowledged and considered during the consultation process required by Section 106 of the National Historic Preservation Act (NHPA).... GSA is formally neutral on the Commission's proposal to designate the buildings as landmarks under the Commission's criteria."</p> |

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| | | | | <p>context of larger planning efforts by the City. Chicago uses landmark designation to preserve "the scale, density, architectural style, pedestrian interest and distinctive character" of districts like State Street which "give the Central Area its world-famous character" and is "critical to maintaining Chicago's exceptional quality of life" as noted by its Central Area Action Plan.</p> <p>Therefore, we agree with the draft report's conclusions that demolition "would alter character-defining features of the Loop Retail Historic District and Chicago Federal Center" and that "there would be negative, significant, long-term impacts to land use." In simplest terms, demolishing these structures would create a large hole in the historic State Street corridor, Chicago's most historically significant retail corridor. Experience with Block 37 (between Randolph and Washington) and Pritzker Park (between Jackson and Van Buren) has shown that significant demolition along this corridor has had long-term damaging effects on the Loop and would be an irreversible loss of Chicago's architectural legacy.</p> | |
| 527 | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | [Refer to Appendix I of the Public Hearing Summary Report on GSA's website for the full letter sent by Landmarks Illinois in response to the Draft EIS.] | Refer to Table H-4 for responses to Landmarks Illinois comments. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 528 | Elizabeth Merritt, Chris Cody | Non-federal agency stakeholder | National Trust for Historic Preservation | <p>The National Trust for Historic Preservation (“National Trust”) continues to object to the Draft Environmental Impact Statement for the Buildings at 202, 214, and 220 South State Street, Chicago, Illinois (“DEIS”). The concerns we communicated to you in our December 12, 2022 scoping comments remain unaddressed, and the DEIS remains fundamentally inadequate. The General Services Administration (“GSA”) should pause this review process to address the DEIS’s flaws and to address the many concerns about this project that have been consistently and vehemently expressed by the public. The National Trust reiterates our request that the DEIS be revised to include a feasible preservation alternative. Currently the DEIS describes three alternatives, but as we detailed in our December 12, 2022 letter (attached), the restrictions included in Alternative B (“Viable Adaptive Reuse”) render it meaningless. The DEIS proposes two other alternatives: Alternative A, Demolition, or the No Action Alternative. Sadly, in the past year we have been made aware of the shocking degree of neglect suffered by these historic buildings. This failure of stewardship by GSA forces us to conclude that even the No Action Alternative would result in cumulative adverse effects to historic resources. The DEIS thus exclusively proposes alternatives that would result in adverse effects to historic resources, and alternatives that at their core are contrary to the public interest. The National Trust is eager to participate in meaningful conversations with GSA to develop a feasible preservation alternative that would result in both the adequate provision of security for the Dirksen Courthouse and the preservation of the historic Century and Consumers Buildings at 202, 214, and 220 South State Street. We are confident that such an alternative is possible, and that it would be a superior outcome to what the DEIS presently contemplates. Sadly, we continue to be unable to have a meaningful conversation with the decision-makers who insist on applying the restrictions listed in Alternative B to any adaptive reuse of the Century and Consumers Buildings. The National Trust and other consulting parties have repeatedly proposed compromise solutions, such as studying what security measures could be located within the Dirksen Courthouse to reduce the security needs at the Century and Consumers Buildings, and the possibility of installing interior partitioning within the Century and Consumers Buildings in order to allow for at least some residential use. Unfortunately, these proposals, and all attempts at consultation regarding economically viable adaptive reuses for the Century and Consumers Buildings, have been met with an absolute unwillingness to compromise. The 15 proposed restrictions applicable to Alternative B prevent the Adaptive Reuse option from achieving viability. Yet these restrictions remain unchanged, despite widespread opposition, and many constructive proposals for compromise. We understand that GSA is not the source of this unwillingness to engage in meaningful consideration of alternatives. We sincerely appreciate the work of GSA staff, and we hope to continue to work with GSA to develop a legitimate preservation alternative. This is an exceptionally challenging situation, and the National Trust would like to help develop an optimal resolution. Unfortunately, we cannot do so if meaningful dialogue cannot occur, and if we are presented with a DEIS that only proposes alternatives that result in adverse effects to historic properties and that are contrary to the public interest. We again urge the GSA to pause this review process to more meaningfully address the comments and concerns that have been vociferously offered to you by the public. Thank you very much for your consideration of our comments.</p> | <p>Alternative B is included in the EIS as a viable adaptive reuse alternative. The criteria for viable adaptive reuse were thoughtfully developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks, and will not be modified. GSA’s Preferred Alternative is Viable Adaptive Reuse and GSA welcomes input from all groups to develop a viable reuse alternative.</p> <p>All comments regarding the No Action Alternative have been noted, included in the administrative record, and taken into consideration. If the No Action Alternative is selected GSA will re-evaluate its effects. However, Section 2.2 of the Final EIS notes the No Action Alternative would not meet the project’s purpose and need and is used as a baseline to evaluate impacts of the Alternative A, Demolition and Alternative B, Viable Adaptive Reuse. This is consistent with the National Environmental Policy Act (NEPA) process.</p> <p>GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse.</p> |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 529 | Stephen Morris | Government agency | National Park Service | <p>I apologize that we have missed the comment deadline for this document, but it has been brought to my attention that it contains an error relating to the World Heritage program in the United States, which my office is responsible for administering. The sections on Heritage Tourism state that "Chicago's early skyscrapers have been nominated for a UNESCO World Heritage Site." This is not the case. A preliminary group of buildings was added to the U.S.'s World Heritage Tentative List in 2017. This means that the proposal is eligible for future nomination by the U.S. Department of the Interior.</p> <p>The remainder of the paragraph does not require correction. I hope that this can be addressed in the final document, so as not to cause confusion for readers. Thanks very much.</p> | Thank you for your comment. The Final EIS has been updated to reflect the National Park Service's input. |

Table H-2: Comments Received in a Letter from Landmarks Illinois on the Draft EIS and GSA Responses

| Comment Number | Name | Group | Organization/ Affiliation | Comment/Inquiry | Response |
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| 530 (LI 1) | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | <p>Thank you for the opportunity to provide comments on the draft EIS prepared for 202-220 S. State Street, Chicago. Broadly, Landmarks Illinois has the following concerns about the draft EIS as presented:</p> <ul style="list-style-type: none"> • There is insufficient explanation as to why additional alternatives were reviewed and dismissed without further consideration • The impacts of demolition are understated • Proposed mitigation measures are insufficient • We will explore specific concerns in further detail in the remainder of this letter, with section headings corresponding to sections of the draft EIS. <p>We previously commented on Alternatives A, B, and C in our letter of December 12, 2022 that was submitted in response to a call for public scoping. We would like to take this opportunity to comment individually on alternatives that were dismissed from consideration. In most cases, we cannot conclude based on the information shared in the draft EIS that these alternatives have received full and adequate consideration.</p> | <p>The EIS is fully transparent in its alternatives and why they were dismissed. The impacts of demolition were not understated or undervalued, as discussed in the responses below.</p> <p>Proposed mitigation had not yet been finalized at the time of publication of the Draft EIS. GSA has and continues to consult with Illinois SHPO, the Advisory Council on Historic Preservation, and other consulting parties on appropriate mitigation measures documented in the draft Section 106 Programmatic Agreement.</p> |
| 530 (LI 2) | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | <p>The draft EIS dismisses the possibility of retrofitting the Dirksen Courthouse based on claims that additional countermeasures at the Dirksen Courthouse are cost prohibitive or not possible because of the design and construction of the courthouse. The public deserves to understand why hardening the Dirksen Courthouse is considered prohibitive and to be informed of the estimated costs to introduce additional countermeasures that would be compatible with the courthouse’s design and construction before that alternative is dismissed as infeasible.</p> | <p>GSA’s evaluation is informed by the expertise of the U.S. Marshal Service and Federal Protective Service in response to the risks and threats to the Dirksen Courthouse and have thereby established the viable adaptive security criteria to mitigate those security risks. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS.</p> |
| 530 (LI 3) | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | <p>Again, the public deserves to understand the estimated costs of relocating the courthouse before this alternative is dismissed. As the draft EIS identifies the Dirksen Courthouse as the largest in the country, presumably a new courthouse for Chicago could be competitive when seeking congressional funding.</p> | <p>GSA has not developed a cost estimate of relocating the Dirksen Courthouse any further than what is discussed in Section 2.3.2. The cost would far exceed that of adaptive reuse or demolition of the buildings. Additionally, relocating the Dirksen Courthouse tenants would raise the question of what to do with the Courthouse, which is also a historic building. As noted in Section 1.3.3, GSA has not identified a federal need for the buildings at 202, 214 and 220 South State Street, so therefore finding a federal use for the 1.4 million square foot Dirksen Courthouse would be unlikely.</p> |
| 530 (LI 4) | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | <p>The draft EIS dismisses the possibility of federal occupancy of the State Street buildings based on lack of federal agency use for the space and a directive for the federal government to reduce its footprint. The draft EIS does not consider the possibility of relocating federal office space from other areas of the city, although there are several other facilities housing federal employees in downtown Chicago. If these federal offices were to be consolidated along State Street, then federal office spaces in other areas of downtown with fewer security concerns could be turned over to non-federal uses.</p> | <p>GSA’s portfolio plan does not align with federal use of these properties as GSA optimizes its footprint.</p> |
| 530 (LI 5) | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | <p>Both of these alternatives are stymied by the viable adaptive reuse criteria. We have commented in the past that we find the adaptive reuse criteria overly restrictive and not responsive to current market conditions and demands in Chicago. Providing additional justification based on the City of Chicago’s past inability to fulfill those same criteria is mere obfuscation, and we believe that reference should be removed.</p> | <p>The adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies to address security risks. GSA began the charrette process in Fall 2023 to facilitate consulting parties working collaboratively with building design professionals to brainstorm ideas to enhance the viability of adaptive reuse.</p> |

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| 530 (LI 6) | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | <p>We strongly agree with the characterization that Alternative A: Demolition would have impacts that are negative, significant, and long-term. The demolition of 202, 214, and 220 S. State Street would irrevocably erase these historic resources, diminish the overall integrity of the Loop Retail Historic District, and remove critical context for the Chicago Federal Center, the very complex that this action seeks to safeguard.</p> <p>We also agree that adaptive reuse would have impacts that are beneficial, negligible-to-moderate, and long-term. Adaptively reusing these buildings will breathe life back into a stretch of State Street that has been inactive for far too long. Although some alteration may be required to put the buildings back into active use, the potential negative impacts pale in comparison to the impacts of demolition, or to the impacts of no action.</p> <p>Finally, while we agree that Alternative C: No Action would have impacts that are negative and long-term, it is our position that these impacts are likely to be significant, not moderate. To date, GSA's available funding and actions have been insufficient to the maintenance needs of the buildings, and instead have been at best reactionary to a declining state of affairs. GSA will continue to have limited federal funds available for maintenance and repairs. Thus, it is realistic to expect that the status quo will result in the continued deterioration of these buildings. Lack of maintenance has already contributed to the demolition of 208-212 S. State Street, and we can reasonably predict that 202, 214, and 220 may eventually meet the same fate if no action is taken.</p> | <p>All comments regarding the No Action Alternative have been noted, included in the administrative record, and taken into consideration. If the No Action Alternative is selected GSA will re-evaluate its effects. However, the Final EIS Section 2.2 notes the No Action Alternative would not meet the project's purpose and need and is used as a baseline to evaluate impacts of the Alternative A, Demolition and Alternative B, Viable Adaptive Reuse. This is consistent with the National Environmental Policy Act (NEPA) process.</p> |
| 530 (LI 7) | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | <p>We strongly disagree with the finding that Alternative A would result in minor-to-moderate impacts to the aesthetic and visual environment. Rather, we believe these impacts would be significant. State Street is one of the densest corridors in the City of Chicago. The visual hole that would be left permanently in the streetscape if the existing buildings were to be demolished and replaced with open space would be totally inconsistent with the character of the corridor. Moreover, the mitigation proposed is not adequate. Although there are examples of flat green spaces and plazas in the greater Loop area, with the exception of Pritzker Park, these examples are not located along State Street. Open space with landscaping is not consistent with the aesthetic and visual character of State Street, and we do not agree that this mitigation would result in only a minor noticeable compatibility and sensitivity change by viewers.</p> <p>Additionally, the draft EIS reports that the open space resulting from demolition would "possibly" be open to the public. The proposed mitigation becomes even less sufficient if the resulting open space is not guaranteed to be publicly accessible. The final EIS should include information on whether the public can actually expect access to this space if the GSA proceeds with Alternative A.</p> | <p>The last paragraph of Section 3.2.2.1 has been revised to state "<u>The Demolition Alternative would result in a long-term negative impact at the project site, that would range from minor to moderate based on the viewer activity, viewer sensitivity to change, viewer location, and duration of view. The character of the surrounding Loop Retail Historic District would be maintained resulting in an overall moderate impact regarding aesthetic and visual resources.</u>"</p> <p>The Final EIS document equally evaluated Alternative, A Demolition; Alternative B, Viable Adaptive Reuse; and the No Action Alternative. The mitigation measures described in Section 3.2.3 outline that future coordination is planned to occur under the Preferred Alternative.</p> |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
|----------------|---------------|--------------------------------|--------------------------|---|---|
| 530 (LI 8) | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | We appreciate the draft EIS's use of and reference to CARE tool for estimating the embodied carbon impacts of the existing buildings; however, it is not clear how the draft EIS arrives at the conclusion that 5,500 tons of carbon dioxide equivalent, equivalent of carbon sequestered by 16,300 acres of forest, is a negligible impact under Alternative A. The final EIS should elaborate on the threshold for what is considered negligible. Even if no new building is constructed on this site, it is still wasteful of embodied carbon to demolish these buildings. Moreover, reuse of the buildings could decrease need for new construction on an alternative site. | GHG emissions associated with demolitions indeed are one of the main contributors to the Alternative A's footprint. Nonetheless, the greatest contributors to the project footprint are the potential lifetime use of the buildings and the associated electricity and natural gas emissions. While embodied carbon is an important factor, adaptive reuse emissions are over 4 times higher than the demolition emissions due to operational emissions that will follow from the building's use. Embodied carbon emissions due to backfill material and limited concrete were included in the greenhouse gas assessment for the Demolition Alternative. The impact is estimated at 300 tonnes CO2, out of a total of more than 7,000 tonnes of CO2 for all sources which is less than 5% of total emissions and therefore not material. Since 5% is the materiality threshold most often used in greenhouse gas inventories to assess the significance of a source's contribution to the inventory total, any/all sources less than 5% were reasonably considered to have minimal impact. Text has been added to Final EIS Section 3.6.2.1 to clarify. (Note to commenter that the Final EIS estimates 3,500 tonnes of carbon dioxide equivalent, not 5,500 as stated in the comment). |
| 530 (LI 9) | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | The EIS should not consider cumulative demolition impacts from demolitions that took place in the Loop Retail Historic District before the district was designated in 1998, since the district was evaluated at that time to have sufficient integrity for designation. Pre-1998 demolitions did not diminish the integrity of the future historic district since it had not yet been evaluated for integrity. The reference to pre-1998 demolitions in this section is confusing for the reader. | The purpose of referencing past demolitions pre-1998 is to demonstrate that these building demolitions did not hinder the future designation of the Loop Retail Historic District. Despite these building demolitions, the area retained enough historic integrity to be designated as a historic district. Cumulative impacts analysis requires looking at what has happened in the past and considering those impacts combined with the Proposed Action. This leads to the conclusion in the EIS that Alternative A combined with past actions and other reasonably foreseeable future actions would result in a negative, moderate cumulative impact to the Loop Retail Historic District. |
| 530 (LI 10) | Kendra Parzen | Non-federal agency stakeholder | Landmarks Illinois | In summary, we question whether the draft EIS commits to full and transparent exploration of possible alternatives, have concerns that the impacts of demolition are undervalued, and find that the mitigation proposed is poor compensation for the loss of the historic buildings at 202-220 S. State Street. Demolition of these buildings remains the wrong choice for Chicago. We look forward to continuing to consult with your agency in the hopes that you will make the right choice to pursue adaptive reuse for these buildings. Thank you for considering our comments. | Comment noted. |

Table H-3: Comments Received in a Letter from the Environmental Protection Agency (EPA) on the Draft EIS and GSA Responses

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
|----------------|------------|----------------|--------------------------|--|---|
| 531 (EPA 1) | Liz Peloso | Federal agency | EPA | Provide additional context and information on the prohibited uses specified in the viable adaptive reuse criteria. | Federal law enforcement would not be able to monitor activities within these federal properties as an individual's residence as they would with other uses such as office or commercial. Constitutional limitations on the government's authority to search and police activities in private residences cause residential use to present significantly greater risk than office or commercial use. |
| 531 (EPA 2) | Liz Peloso | Federal agency | EPA | Provide additional context and information regarding the coordination between GSA and CCAC, and on any other Viable Adaptive Reuse projects that are currently under consideration. | The Commission's recommendation is referred to the City Council Committee on Zoning, Landmarks and Building Standards, which votes on whether to recommend the designation to the full City Council. GSA has met with representatives of CCAC on several occasions during the ongoing Section 106 consultation process. The EIS considered Viable Adaptive Reuse as a concept and did not evaluate specific adaptive reuse projects. |
| 531 (EPA 3) | Liz Peloso | Federal agency | EPA | Provide information on how GSA approaches outleases (as they relate to Alternative B), including how GSA engages the market through a request for information in order to gauge interest, explores uses, and determines financial viability. Should GSA select Alternative B in the FEIS, discuss how GSA would proceed with reuse, including if there would be a Request for Proposal for an outlease and "best value source selection procedures," which look at cost and technical factors, to select an outleasee/developer for the space. | GSA leases available vacant space in certain properties at market rates. If Alternative B, Viable Adaptive Reuse, is selected, GSA would seek lessees for one, two or all three buildings. As GSA indicated during Section 106 consultation meetings, it would consider a wide range of outlease options. Specific parameters have not yet been developed. They would be developed if Alternative B is selected. Information on leasing to non-federal entities as a contracting method possible under the Viable Adaptive Reuse Alternative was presented at the first meeting with the consulting parties on January 19, 2023 and again, as noted in the comment, in June 2023. |
| 531 (EPA 4) | Liz Peloso | Federal agency | EPA | We reiterate our 2022 scoping comments as follows: <ul style="list-style-type: none"> 1. Discuss how NHPA Section 110 applies to the project and describe how GSA will meet the requirements of Section 110; and 2. Assess options for documenting historic building information prior to demolition, should Alternative A be selected; Provide an update on the NHPA Section 106 consultation process, particularly in light of the Preferred Alternative that will be identified in the FEIS and that consulting party meetings occur approximately once a month; Provide additional background information on the 2022 Consolidated Appropriations Act's authority and funding to demolish the buildings; and Should Alternative A be selected, provide commensurate justification as to why demolition is GSA's preferred alternative. Demolition is not consistent with the City of Chicago's planning goals and is expected to result in adverse effects to adjacent Historic Districts and NHPA-listed properties, and negative and long-term impacts to NHLs, viewsheds from the historic districts, and other historic properties within the APE. | Section 110 is a programmatic responsibility of all federal agencies and applies to 202, 214, and 220 South State Street because they are contributing elements of a National Register-listed historic district. Mitigation measures in the event Alternative A, Demolition is selected were developed as part of the on-going Section 106 consultation. The Draft EIS provided an update on Section 106 consultation at the time of its August 2023 publication. The Final EIS provides an update on the Section 106 process in Section 1.4.2. US EPA is an invited consulting party. GSA has no additional background on the 2022 Congressional Appropriations Act's authority and funding beyond what is in Section 1.3.2 of the Final EIS. At the time of publication of the Draft EIS, GSA did not have a Preferred Alternative. Section 2.5 of the Final EIS states that GSA's Preferred Alternative is Viable Adaptive Reuse (Alternative B). 202 and 220 South State Street are currently not under review by UNESCO for the World Heritage program. In 2017, a preliminary group of nine primarily commercial buildings in Chicago's central business district, the "Loop," were submitted by the U.S. Department of the Interior to the UNESCO World Heritage Tentative List. This means that the proposal is potentially eligible for future nomination by the U.S. Department of the Interior for UNESCO consideration. |
| 531 (EPA 5) | Liz Peloso | Federal agency | EPA | Provide clearer information on the conditions of 202, 214, and 220 South State Street when they were acquired. Compare the initial building conditions to current conditions. Provide additional information on why GSA has not properly maintained any of the buildings since the time they were acquired. | John Lasky Architects, on behalf of GSA, produced Building Preservation Plan reports for 202 and 220 South State Street in 2009, shortly after GSA acquired the buildings. The Building Preservation Plan states that 202 South State Street has shown signs of deterioration since 1934. It was cited as one of 1,100 buildings in a state of dangerous disrepair in a 1974 survey ordered by the City of Chicago. In 1984, a section of terra cotta broke loose from the building, falling 100 feet and critically injuring a woman. The plan states that the first floor of 202 South State Street existed in a deteriorated state, the upper floors were mostly deteriorated and largely gutted, mechanical systems have been removed or are non-operational, and the building had overall poor exterior integrity. The Building Preservation Plan for 220 South State Street reported that the building was generally in good structural and exterior integrity but was found to be uninhabitable/unmarketable due to significant fire protection/life safety/safety deficiencies and asbestos-containing materials and lead-based paint found in several areas. Alterations from over the years have changed elements of the building beyond original recognition. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
|----------------|-------------|----------------|--------------------------|--|--|
| 531 (EPA 6) | Liz Pelloso | Federal agency | EPA | <p>GSA should consider committing to the following:</p> <ul style="list-style-type: none"> • Recycling a high percentage of construction and demolition debris; • Establishing material hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents. Identify potential material hauling routes. • Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to: <ul style="list-style-type: none"> - Using recycled materials to replace carbon-intensive Portland Cement in concrete as “supplementary cementitious material;” and - Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation). • Assuming Alternative A is selected: <ul style="list-style-type: none"> - Ensuring areas adjacent to the buildings and project footprint be considered for conversion to native habitats, increasing the area which can be beneficially used for wildlife, stormwater infiltration or detention, and aesthetics, among other functions; and - Identifying and implementing opportunities for additional green stormwater management practices, such as bioswales and rain gardens. • Assuming Alternative B is selected: <ul style="list-style-type: none"> - Achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for retrofit and remodeling projects associated with the project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion sensed lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages GSA to commit to analyze the strengths and feasibility of these strategies; and - Discussing to what extent GSA will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order 13693. | <p>For all construction and demolition projects, GSA complies with applicable laws and standards for which they are responsible, as listed in Section 2.1.1 and 2.1.2 of the Final EIS. GSA will consider committing to the recommended practices.</p> |
| 531 (EPA 7) | Liz Pelloso | Federal agency | EPA | <p>Apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues for all alternatives, including the Preferred Alternative once selected. Additional recommendations are as follows: <u><i>Emissions & SC-GHG Disclosure and Analysis</i></u></p> <ul style="list-style-type: none"> • Include a detailed discussion of the project’s reasonably foreseeable direct and indirect GHG emissions (for all alternatives) in the context of actions necessary to achieve Illinois’ policies and GHG emission reduction goals* as well as national policy and GHG emission reduction goals over the anticipated project lifetime, including the U.S. 2030 Paris targets and the 2050 goal for net-zero energy emissions. | <p>Greenhouse gas (GHG) emissions have been quantified for all relevant direct and indirect sources consistent with the requested NEPA guidance. Emission totals for each GHG pollutant are included for each source. Methodology has been summarized and assumptions detailed in Section 3.6.1 of the Final EIS. Source specific quantification methodologies are attached to the Final EIS in a new appendix (Appendix G). Social cost of carbon has been calculated for CO2, CH4 and N2O using EPA guidance (refer to Table 3.6-9 in the Final EIS). The emissions impacts have been re-assessed in the context of federal, Illinois and City of Chicago climate targets, and mitigation measures have been bolstered with additional detail. Resiliency details have been added for each scenario with assumptions and definitions noted. For the No Action Alternative GSA provide additional detail explaining why there are not any additional emissions in the Final EIS. Specific edits to the Final EIS to address comments include:</p> |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
|----------------|------|-------|--------------------------|--|---|
| | | | | <ul style="list-style-type: none"> Provide additional context and calculations regarding how the estimated Greenhouse Gas Emissions were calculated in the DEIS. Quantify estimates of all direct and indirect GHG emissions** from the proposed project over its anticipated lifetime for all alternatives, including the No Action Alternative, broken out by GHG type. Include and analyze potential upstream and downstream GHG emissions. Use comparisons of GHG emissions and SC-GHG across alternatives to inform project decision-making. Use SC-GHG estimates to disclose and consider the climate damages from net changes in direct and indirect emissions of CO2 and other GHGs resulting 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).*** When applying SC-GHG estimates, just as with tools to quantify emissions, GSA should 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. <p><u>Resilience and Adaptation</u></p> <ul style="list-style-type: none"> 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 the environmental impacts of the proposed project and alternatives. Incorporate robust climate resilience and adaption considerations into (1) project design and engineering; (2) construction oversight; (3) commitments for protective measures related to stormwater and erosion; and (4) routine monitoring during operations. The FEIS should describe how GSA has addressed such considerations and provide a rationale for any reasonable alternatives to enhance resilience that were not adopted or discussed in detail. <p><u>Reduction and Mitigation</u></p> <ul style="list-style-type: none"> Identify practices to reduce and mitigate GHG emissions; include commitments to do so in the FEIS. We recommend GSA consider practices in the enclosed Construction Emission Control Checklist. <p>*Illinois' Climate and Equitable Jobs Act (SB 2408) lays out multiple goals; see: https://www2.illinois.gov/IISNews/23893-Climate_and_Equitable_Jobs_Act.pdf</p> <p>**As discussed in Section IV(A) of CEQ's 2023 interim guidance, "agencies generally should quantify all reasonably foreseeable emissions associated with a proposed action and reasonable alternatives (as well as the no-action alternative). Quantification should include the reasonably foreseeable direct and indirect GHG emissions of their proposed actions. Agencies also should disclose the information and any assumptions used in the analysis and explain any uncertainty. In assessing a proposed action's, and reasonable alternatives', reasonably foreseeable direct and indirect GHG emissions, the agency should use the best available information."</p> <p>*** 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</p> | <ul style="list-style-type: none"> More detail added to GHG tables indicating direct and indirect sources and sub-totals for each GHG pollutant (CO2, CH4 and N2O) More specific descriptions of methodologies and assumptions provided Language edited for No Action Alternative to better explain the claim of no additional emissions (e.g. disconnected utilities, etc.) Added in resiliency language to address resiliency concerns More detail added regarding mitigation and reduction measures using the Construction Emission Control Checklist provided in the EPA's comment. <p>The Final EIS addresses these suggestions including a breakdown of emissions by the greenhouse gas, and separately reports them as direct and indirect emissions. Furthermore, more detail was added to the resiliency and adaptation considerations.</p> |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| | | | | 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. | |
| 531 (EPA 8) | Liz Pellosso | Federal agency | EPA | Create an appendix to include all comments received during the DEIS comment period – including any applicable transcripts of comments from the public, and all comment letters received. For all government agency letters received, include GSA's responses to specific comments from each letter. Responses to public comments should also be included. EPA also recommends that the appendix include all correspondence sent to and received from the resource agencies regarding the project. | Records of comments received during the Draft EIS comment period are included in the Public Hearing Summary Report posted to GSA's 202-220 S. State St. Federal Properties website (https://www.gsa.gov/about-us/gsa-regions/region-5-great-lakes/buildings-and-facilities/illinois/chicago-202220-s-state-st-fps). The Summary Report includes: <ul style="list-style-type: none"> • Transcript from the public hearing, including comments delivered orally • Copies of all written comments received during the Draft EIS comment period • Table of comments submitted via the online comment form |

Table H-4: Comments Received in a Letter from the Chicago Collaborative Archive Center (CCAC) on the Draft EIS and GSA Responses

| Comment Number | Name | Group | Organization/ Affiliation | Comment/Inquiry | Response |
|-----------------------|----------------------------------|--------------------------------|----------------------------------|---|--|
| 532 (CCAC 1) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | Minor to moderate: Throughout this report, there are moments where “minor to moderate” is used as a response to the impact. It is long past time to modify this into at least two separate categories. When considering impacts, there is a substantial difference between minor and moderate. We can measure these things in a more nuanced and enlightened way. | Minor to moderate is used in some impact analyses where the intensity of the impacts could vary for various reasons. It captures the reasonable potential for effects. |
| 532 (CCAC 2) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | ES.2. We will reiterate this point every time we communicate on this issue, so it is a good place to start. When does the federal government intend to acquire all the other properties similarly sited from the courthouse and schedule their demolition? It will require a great deal of money, but in the name of security it seems like the right thing to do. If that is not happening, then why are we still here grappling over what is essential to protect judges, employees, and visitors? Either demolition is the only way, or demolition is the only way the GSA cares to deal with these surplus properties. | GSA does not plan to acquire any other buildings adjacent to the Dirksen Courthouse. |
| 532 (CCAC 3) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | ES.2. Another reminder that a simple solution is to add to the language in the 2022 appropriation to include “restoration” as a use of the federal funds. If that cannot occur or as an act of Congress, pass on those remaining funds, and seek proper funding in another budget year. It seems reasonable that the existing appropriated funding could be used to demolish obsolete interior non-historic partitions and features, exterior fire escapes and systems, while additional funds – both private and public – could be pursued for the rest of the restoration. | The 2022 Appropriation is law and can only be amended through an act of Congress. |
| 532 (CCAC 4) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | ES.2. As has been previously covered, the GSA can reduce its real estate footprint in this situation by leasing the buildings to a private, preservation-focused developer who will reactivate, restore and re-envision these iconic buildings as a great source of new institutions and amenities of commerce. | The Viable Adaptive Reuse Alternative, considered in the Final EIS, embodies this approach. |
| 532 (CCAC 5) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | ES4.1. There is mention of reorienting the Dirksen Federal Courthouse entrance to the east side of the building, in order to provide meeting places and media gathering places for visitors to the courthouse. How much of a motivation is that plan in this course toward demolition? There is a Mies van der Rohe designed plaza which already exists for this function at the west end of Quincy Court, adjoining the east side of the Dirksen Courthouse Building, currently used as a truck and service dock and for parking of vehicles. In addition, the large Federal Center Plaza is located directly across the street from the courthouse on Dearborn that can easily accommodate additional visitors and media. A second federally owned plaza built just east of the courthouse seems excessive by reasonable standards. | The possibility of a re-oriented entrance at the Dirksen Courthouse is not a factor in the consideration of the Demolition Alternative. The Demolition Alternative is being considered to address security needs of the Dirksen Courthouse, respond to Congressional Intent in the 2022 Consolidated Appropriations Act, and to manage federal assets. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
|----------------|----------------------------------|--------------------------------|--------------------------|---|--|
| 532 (CCAC 6) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | ES4.2. The 15 criteria for redevelopment. This list is as long as it is arbitrary. It seems intended to prevent a viable reuse and facilitate a swift demolition. Unfortunately, this Section 106 process affords us exactly the opportunity to point to discrepancies, spotlight flaws, and collaborate on a final plan for a federally owned, internationally significant historic high rises in downtown Chicago. That is what we are doing here. We will continue to do so at every opportunity. This list can be significantly shortened with or without a hardening of the courthouse windows and walls, but it could possibly be eliminated with the hardening of the courthouse windows. In the name of security, we would help the GSA advocate to Congress to utilize these funds to protect the lives of judges, employees, and visitors by hardening the walls of the courthouse itself. It also must be noted that if 202 through 220 are demolished, it is providing clear sight lines from the buildings across S. State Street into the federal courthouse. Again, unless GSA has immediate plans to acquire and demolish every other building nearby, we can talk honestly about how convincing the security at all costs argument is. | The viable adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies. The criteria are deemed necessary to protect the Dirksen Courthouse staff, jurors, judges and witnesses given the very close proximity of 202, 214 and 220 South State Street. They were not developed to prevent a viable adaptive reuse from occurring. |
| 532 (CCAC 7) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | ES4.2. Criteria for development. No vehicular access on Quincy Court (#4) or on the properties (#5 loading and #7 parking) themselves. It must be noted that the garage for delivery for 220 is on Quincy Court. For removal of debris or delivery related to renovations, this would be highly beneficial. Concerning loading and/or parking, having gated and covered loading docks are much safer than from the street and across public sidewalks. This is well-documented and part of high value loan agreements related to the movement collections. The GSA could easily consult with the National Gallery or Smithsonian related to this. Or security could consider what protocol they follow with respect to movement of prisoners or high value federal persons. It is not across a public sidewalk. It is done securely behind gates at minimum but best behind appropriate doors, out of the elements, and in a secure setting. This similar protocol is for the movement of art and archives. Also noting a hardening of the courthouse building, it seems viable to allow scheduled deliveries to the site as is currently allowed at the Berghoff Restaurant. | The viable adaptive reuse security criteria do not allow access to Quincy Court. The security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies. The criteria are deemed necessary to protect the Dirksen Courthouse staff, jurors, judges and witnesses given the very close proximity of 202, 214 and 220 South State Street. They were not developed to prevent a viable adaptive reuse from occurring. |
| 532 (CCAC 8) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | ES4.2. Criteria for development. Residential housing should be an allowable use on these sites. Perhaps housing for federal employees where the tenants have the background check clearance to live in the housing. | The viable adaptive reuse security criteria were developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies. Under the Viable Adaptive Reuse Alternative, GSA will issue a Request for Lease Proposals (RLP) to seek a reuse that meets the purpose and need for the Proposed Action. GSA would request market-driven redevelopment proposals with the following considerations. First, GSA shall consider and prioritize proposals that align with the viable adaptive reuse security criteria established for this proposed action and demonstrate the financial capability of the offeror to successfully execute. Second, GSA shall consider proposals with proposed deviations from the viable adaptive reuse security criteria that demonstrate the financial capability of the offeror to successfully execute. Any proposed deviation must be agreed to by GSA. |

| Comment Number | Name | Group | Organization/Affiliation | Comment/Inquiry | Response |
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| 532 (CCAC 9) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | Table ES-1. It is difficult to consider that demolishing two historically and culturally significant skyscrapers would have a negative, minor, short-term impact on the surrounding historic sites. When you consider a can of standards that we've been updating over the decades but is still a work in progress and forever (hopefully evolving), how can we consider one part of the community without considering the whole of the community? When you remove pieces of the history of Chicago, the story has to be rewritten. We seek to keep all the pieces intact we can so we do not have to tell stories of our history through the use of pictures and headstones. Whether it is for "Cultural Resources" or for "Aesthetic & Visual Resources", demolition would be significant with long-term impacts. Demolition, by nature, is significant and permanently changes the visual understanding of a street and erases the historical context for which the street was created and intended. The visual, esthetic, and cultural resources that created the build environment for which the architect, Ludwig Mies van der Rohe, used in designing the federal courthouse. Demolition of 202-220 removes the architect's intent. That is significant and permanent... long-term impact. | The area of potential effects includes the project location as well as surrounding historic properties and encompasses all areas where historic properties could reasonably be expected to be affected by the undertaking. In this way, the analysis accounts for possible effects to historic properties beyond the project footprint. Table ES-1 (Cultural Resources) acknowledges a negative, significant, and long-term impact for the buildings, as well as negative, moderate, and long-term impacts on the Loop Retail Historic District and the Chicago Federal Center. Also refer to response to comment number CCAC 41. Refer to response to comment number CCAC 51 for more information on potential aesthetic and visual resources impacts under demolition. These edits (demolition would result in a long-term negative impact at the project site, that would range from minor to moderate based on the viewer activity, viewer sensitivity to change, viewer location, and duration of view) have been applied to Table ES-1 in the Final EIS. |
| 532 (CCAC 10) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | Table ES-1. Under socioeconomic and environmental justice consideration, it is suggested in this table that the impact of demolishing the historic buildings at 202, 214, and 220 South State Street would be minor on heritage tourism and environmental justice. It is noted further in this report that since the GSA cannot quantify specifically how many heritage tourists come to Chicago just to see the Century & Consumers Buildings, it cannot be adequately considered. Our discipline of historic preservation teaches us that the more pieces of a story we have intact, the better we can tell the story. If there is a single house on a street that was once lined with similarly designed or period houses, it is difficult to talk about the glorious street when only one is left. It is uncertain how many more demolitions it will take to permanently destroy heritage tourism in Chicago, but every bite bleeds and leaves a scar. On the environment, in what overburdened landfill will the remnants of three historic buildings be laid to rest after a demolition? Is that landfill in an environmentally burdened community? Is its life expectancy growing shorter by the year as leaders and developers choose convenience over almost everything else? There is nothing convenient about the choices the GSA has to make here, but demolition is certainly the easiest of the three. Good thing we are not a city who always responds favorably to doing things the easy way. | The discussion of impacts to heritage tourism does not state that impacts to heritage tourism cannot be adequately considered. The Final EIS does consider impacts to heritage tourism and concludes the Demolition Alternative would have negative, minor, and long-term impacts to heritage tourism in the Loop and Chicago in general. Refer to Section 3.5.2.1 of the Final EIS. GSA agrees with the comment that the more pieces of a story that are intact, the better a story can be told. Regarding environmental justice and location of landfills, Section 3.7.1.1 and Table 3.7-1 discuss location of landfills that can accept nonhazardous construction debris and their life expectancy. |

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| 532 (CCAC 11) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | Table ES-1. Can the GSA provide data showing how the greenhouse gas emissions impact will be the same for demolition as it will be for adaptive reuse? In every other legitimate greenhouse gas emission analysis I have worked on, there is a significantly higher impact from demolition. We look forward to seeing GSA data to back up this suggestion, otherwise we think the impact from demolition should be upgraded to significant. | Demolition emissions are estimated at 7,000 tonnes of CO2. These emissions are largely from fuel consumption by construction equipment in addition to transportation and disposal of waste material. The fuel and electricity emissions estimated for demolition activities are consistent and conservative compared to published studies assessing the emissions intensity of the demolition of building materials (Decarbonization potentials of the embodied energy use and operational process in buildings: A review from the life-cycle perspective - https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10550614/ ; Nielsen, C.V. Carbon Footprint of Concrete Buildings Seen in the Life Cycle Perspective; Claus Vestergaard Nielsen of the Danish Technological Institute, Concrete Centre: Taastrup, Denmark - http://www.dti.dk/_root/media/31685_Carbon%20Footprint%20of%20Concrete%20Buildings%20seen%20in%20the%20Life%20Cycle%20Perspective.pdf). Adaptive reuse emissions are estimated at 8,000 tonnes of CO2 for the construction/re-build period, largely from the embodied carbon of new construction materials and mechanical equipment. Without embodied carbon, the adaptive reuse emissions are estimated to be 3,600 tonnes of CO2, significantly less due to shorter construction durations and significantly less waste generation. Specific source emissions and boundary assessments are detailed in Section 3.6 of the Final EIS. In the context of the reduction targets for the United States as part of the Paris Agreement, the state of Illinois and the City of Chicago reduction targets, GSA agrees that the short-term impact for both alternatives should be considered significant. This is reflected in Table ES-1 and Section 3.6.2 of the Final EIS. |
| 532 (CCAC 12) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | Table ES-2. This table suggests that the hazardous material impact will be the same for demolition and adaptive reuse. Surely there are ways to stabilize or enclose hazardous materials in an adaptive reuse that would make the cumulative impact less severe than demolition. Can we see some data to back this up? Otherwise, again, let's upgrade the demolition impact to more severe than adaptive reuse. | Based on subject of the comment, this likely refers to Table ES-1 and not ES-2. GSA maintains asbestos containing materials in good condition, according to PBS Policy. Damaged asbestos containing materials shall be removed or repaired. Encapsulation is an acceptable option to eliminate damaged asbestos containing material. In an adaptive reuse scenario, asbestos containing materials may be able to be encapsulated if they are in good condition or existing interior floor plans are likely to be preserved during re-use redevelopment; however, this scenario is not likely for the project based on current building condition and requirements of modern-day users. Additionally, GSA or a developer may elect to remove all hazardous material building materials in the adaptive reuse scenario to remove risk to occupants and future legacy requirements such as continual maintenance and monitoring of the hazardous building materials that would be required if they were encapsulated. Existing roofing materials at the buildings have likely outlived their useful life and will require removal and disposal under both scenarios. As there is no specific re-use or demolition plan currently in place to confirm how hazardous building materials would need to be managed in this scenario, it is GSA's opinion that the impact of hazardous building materials on the project will be similar for either the demolition or adaptive reuse scenarios. |
| 532 (CCAC 13) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | Table ES-1. It is suggested in this table that the health and safety of no action in this matter is far worse than demolition, which sounds like a case for demolition. It is important to note everywhere it comes up that the building is in this condition because the GSA cannot commit the resources toward its proper care and maintenance. To then suggest that demolition is the better option from a health and safety perspective is a frustrating circle to be in. Can we clarify here what is really going on and evaluate it for what it is? Historically significant buildings that can be viably repurposed and cared for in a manner that is better for the block, the neighborhood, and the City of Chicago. | As stated in Table ES-1, deteriorating buildings pose a health and safety risk, as evidenced by scaffolding currently in place to protect pedestrians. This risk would be removed under both demolition and viable adaptive reuse. |

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| 532 (CCAC 14) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | ES.7. In the consideration of cumulative impacts, there is no discussion of the cumulative economic impact of demolishing two historic skyscrapers near the heart of downtown Chicago, in the loop, known historically for commercial business. Also, please help us understand how the cumulative aesthetic and visual impact of demolition would be only minor to moderate? Otherwise, bump up that assessment to significant and negative impact. Please substantiate the claim that demolishing buildings that could house people or businesses full of workers would have a beneficial impact on nearby community facilities. That runs counter to logic and reasoning. This should be adjusted to moderately significant negative impact. | Cumulative impacts to the economy are analyzed in Section 4.2.5.1 of the Final EIS. The analysis considers the <u>current</u> use of the buildings in assessing the cumulative impacts. Because the buildings are currently vacant and not generating any economic activity, demolishing the buildings would not change existing economic conditions. The Draft EIS does acknowledge that if the buildings are demolished, there would be a lost opportunity for GSA and the City of Chicago to realize any long-term economic benefits associated with the reuse of the buildings. The cumulative impacts analysis considers the incremental impacts of the Action Alternatives in conjunction with the impacts of past, present, and reasonably foreseeable future activities. As described in Section 4.2.2.1 of the Final EIS, in consideration of past building demolitions that have occurred in the Loop and the presence of other flat green spaces/plazas near the project site, Alternative A, Demolition would not dramatically change the existing eclectic urban character of the Loop. Therefore, the negative cumulative impact to aesthetic and visual resources would only be minor-to-moderate. The analysis of cumulative impacts to community facilities considers the <u>current</u> use of the buildings, which are vacant. Impacts are not assessed based on what the buildings could be. As described in Section 4.2.4.1 of the Final EIS, because Alternative A, Demolition could provide a larger, more useful public space adjacent to the Dirksen Courthouse, there would be a beneficial cumulative impact to community facilities. |
| 532 (CCAC 15) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | ES.8. Public engagement. It has not been adequately answered to date by the GSA, so we will ask it again. Why is the GSA prioritizing demolition over adaptive reuse that meets its security criteria by some combination of adaptations to the State Street properties but a focus on the hardening of the federal courthouse instead? We will keep asking it until an answer is presented that stands up to reason, logic, and data. | GSA is not prioritizing demolition over adaptive reuse. Hardening of Dirksen Courthouse has occurred, and federal law enforcement will continue to look for opportunities to further harden the Courthouse as appropriate. GSA will not release any security information beyond what is in Section 1.3.1 of the Final EIS. To ensure safety of the public, witnesses, jurors, defendants, and Dirksen Courthouse staff, federal law enforcement will not release any details on risks to the Courthouse. |
| 532 (CCAC 16) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | Table ES-3. Public engagement. ES.7. This does not address the cumulative economic impact of demolition, but Table ES-3 notes that the public has already expressed concern about the economic impact of demolition. Please help us work more effectively through this process by addressing the legitimate concerns we are collectively bringing before you at every step of this process. Transparency is important. So is seeing our hard work show up in updated versions of documents throughout this process. We should be working as a team on these solutions, but more often than not it appears that the Consulting Parties are not being heard in this process and the responsiveness from the GSA is severely lacking. | GSA is being as transparent as possible throughout this process. GSA acknowledges the consulting parties' frustration that security issues related to the Dirksen Courthouse will not be revealed but this information is withheld in order to protect the safety of the courthouse and its inhabitants. Input from the public and consulting parties have influenced how GSA has conducted the consultation meetings, the charette process, its impact analyses and the alternatives considered. For instance, the greenhouse gas analysis in the Draft EIS was completed because of comments GSA received at the November 2022 public scoping meeting (because the Notice of Intent to prepare the Draft EIS was issued before the Council on Environmental Quality's updated regulations that require greenhouse gas analysis in NEPA documents, GSA was not required to assess greenhouse gas emissions). The Draft EIS assessed moving the Dirksen Courthouse based on comments received at the November 2022 public scoping meeting. Lastly, the charette process that started in fall 2023 was prompted by consulting party comments about working collaboratively with building design professionals to brainstorm ideas to enhance the viability of adaptive reuse. |
| 532 (CCAC 17) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | ES.10. Please update the estimate that this Section 106 process will wrap up by the end of 2023. This would be an opportunity to further discuss and communicate as a team, including the Consulting Parties, regarding a realistic timeline to get through this process. Is there a particular reason the GSA appears to want to move this along quickly? | The Final EIS has an updated Section 106 consultation timeline in Section 3.1.1.1. The Section 106 programmatic agreement will be signed in August 2024. |
| 532 (CCAC 18) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 1.1. Please explain in this document, in writing, why the other adjacent and nearby skyscrapers are not also considered a significant threat to the security of the federal courthouse staff and visitors. We cannot continue to say it is confidential for security reasons and end the discussion. It does not make any logical sense. We should be able to discuss this collaboratively. We will continue to ask this question at every turn until it gets answered to our satisfaction. It sets a dangerous and national precedent for other GSA properties across the United States. | Federal law enforcement has never said they do not consider other adjacent buildings to be a threat. Federal law enforcement participated in a Section 106 consultation meeting and provided all the information they can make publicly available. |

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| 532 (CCAC 19) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 1.2.1. Please update this graphic showing the adjacent buildings on the northeast corner of Dearborn and Adams and the northwest corner of Dearborn and Adams, which are either also a major security threat or this demolition alternative for the subject properties is the easy way out for the GSA. The eastern side of South State Street should also be considered for its security threat if demolition occurs – with demolition resulting in increased sight lines to the Dirksen Federal Courthouse and the larger Chicago Federal Center Complex. | The graphic will not be updated. Its purpose is not to show security threats. |
| 532 (CCAC 20) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 1.2.2. We would request copies of all the studies and reports on reuse, restoration, maintenance, building condition, and important historic features of the buildings that the GSA has developed or contributed to during its ownership of the subject properties. We would also request copies of all the documents listed in this section, as well as any others that may be discovered by the GSA in the course of its work on this matter and relating to the Century and Consumers Buildings. These reports would be useful in understanding perceptions of feasibility and marketability. In the spirit of collaboration, it would be helpful if all members of this process have access to the same information – excluding specific security details. | These reports have been placed on GSA’s website: https://www.gsa.gov/about-us/gsa-regions/region-5-great-lakes/buildings-and-facilities/illinois/chicago-202220-s-state-st-fps |
| 532 (CCAC 21) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 1.3. While we understand the intention of the GSA’s actions to improve security around the Dirksen Federal Courthouse, this section reads as though demolition is the only means to achieve these goals. Can this language in this Draft EIS document, and the GSA documents, be changed to consider security solutions that do not result in the loss of important parts of Chicago’s whole skyscraper history? When will we have reached the point where the last early steel-frame Chicago skyscraper is lost to demolition, which also destroys the final integrity of our built environment history? Do we have to keep demolishing important historic skyscraper buildings until we realize we are too late? When is that breaking point? | Section 1.3 discusses the need for the Proposed Action, it does not discuss solutions to meet those goals. As noted in Section 2.1.2, Viable Reuse Alternative, the Viable Reuse Alternative would meet the purpose and need of the Proposed Action upon satisfying the security needs of the Dirksen Courthouse. |
| 532 (CCAC 22) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 1.3. The GSA is not applying its action to all of the tall buildings around the federal courthouse –just the subject properties, which fall under the ownership of the GSA. We would like a formal statement in response to this question that we have been asking from our first initial meetings. | As noted at several consultation party meetings, GSA does not own other buildings around the Dirksen Courthouse and therefore does not have the ability to control how those buildings are used. Furthermore, the 2022 Consolidated Appropriations Act directs GSA to address security concerns at 202-220 South State Street, not other tall buildings. |
| 532 (CCAC 23) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 1.3.1. “The ability of the federal government to retrofit the Dirksen Courthouse with countermeasures to address known security needs would be infeasible from both a construction and cost consideration standpoint.” Have we collectively and completely worked through those costs compared to the budgeted cost to demolish, which may in fact be far short of the actual cost of demolition? We had substantive and seemingly viable conversations at the first charrette which was received as most promising by the participants who voiced an opinion. It seems reasonable to continue talking through what this could look like, what it would cost, priority zones to be hardened first. We ask the GSA to commission an expert to develop an estimate and scope and estimate in 2023-24 dollars. We can take the conversation from there. | Federal law enforcement has commissioned experts to advise on the feasibility of hardening the Dirksen Courthouse. Some of those reports are listed in Section 1.3.1 of the Final EIS. For security reasons they will not be made available. |
| 532 (CCAC 24) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 1.3.1. Please share a summary of the GSA analysis on sightlines from the properties on the west side of the 200 block of South State Street to the Dirksen Federal Courthouse. if the subject properties at 202 and 220 S. State Street are demolished. | Information on this topic will not be released. |

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| 532 (CCAC 25) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 1.3.3. We politely disagree with what appears to be an assertion that this demolition strategy is driven by a presidential directive to reduce the federal footprint. We encourage the GSA to offer up these properties to a preservation-sensitive developer and invest in reconfiguring its building and complex, to meet its security needs. Adaptive reuse of the subject properties would be expected to support these same needs. | Section 1.3.3 of the Final EIS does not assert that the 2012 Presidential Memorandum <i>Promoting Efficient Spending to Support Agency Operations</i> drives GSA to select the Demolition Alternative. Rather, it provides context to explain why GSA does not have a federal occupancy need for 202, 214 and 220 South State Street. |
| 532 (CCAC 26) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 1.3.3. The GSA notes that it spends \$70,000 a year on scaffolding rentals and \$750,000 every two years for façade improvements. We accept that it is an incredible burden on the GSA, and we encourage the GSA to work with us to have these buildings adaptively restored by a private developer. That burden on the GSA is nowhere near what the buildings require, as witnessed by the current building condition assessments. | GSA's Preferred Alternative is Viable Adaptive Reuse and GSA welcomes input from all groups to develop a viable reuse alternative. |
| 532 (CCAC 27) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 2.1.1. The demolition process as outlined makes no mention of evaluating, documenting, or salvaging any historic elements prior to demolition. We would encourage that language to be further detailed and as specific as possible in the EIS. This documentation process should also seek the highest level of HABS documentation, noting the significance of the Century and Consumers Buildings, designed by several of Chicago's most esteemed and world renowned architects—Holabird & Roche, and Jenny, Mundie and Jensen. | Section 2.1.1 of the Final EIS does note that cultural items would be preserved where possible. GSA consulted with the Illinois SHPO, ACHP, and other consulting parties on potential avoidance, minimization, and mitigation measures for effects to historic properties from demolition of 202 and 220 South State Street. Because GSA selected Viable Adaptive Reuse as the Preferred Alternative, those measures are not included in the draft Programmatic Agreement. However, they are captured in the consultation record and could be revisited through continued consultation if needed. |
| 532 (CCAC 28) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 2.1.2. As we will continue to point out, this list of prohibited uses appears to exceed the logical and clear security needs for the federal courthouse. We challenge this list, particularly its prohibition of residential or lodging, lack of access to Quincy Court even at restricted times, no sightlines to the courthouse (unnecessary with courthouse hardening), and no parking on site at any time. How are these criteria enforced or even considered at the Marquette Building and the Citadel Center? The Citadel was completed post-9/11, and it would seem reasonable that security on a building adjacent to a federal courthouse would require additional consideration. | GSA does not own the Marquette Building or Citadel Center and therefore neither GSA nor federal law enforcement have authority to place restrictions upon their use. |
| 532 (CCAC 29) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 2.2. In the discussion of the "no action" option, it is essential to include the reality of the current situation. We have seen the cumulative impact of 18 years of the federal government's management of these buildings, and the devastation of that impact needs to be clearly articulated in this document. What complete mothballing and maintenance would be needed to keep these buildings in at least their current condition? What would it require to get the buildings back to their 2005 condition? Does the federal government have any responsibility to maintain its assets to some minimum standards? If those standards are not currently being met or achieved, the federal government should transfer them immediately to an owner/developer who can handle that responsibility. | GSA has not analyzed or developed a mothball alternative, nor an alternative to bring the buildings back to their 2005 condition. Because 202, 214, and 220 South State Street do not fill a federal occupancy need, GSA does not have funding to expend on the buildings, other than continued maintenance and security. Building Preservation Plans for 202 and 220 South State Street in 2009 noted falling terra-cotta, most utilities shut off, and upper floors in a 'deteriorated state and largely gutted.' Refer to response to EPA comment number 5 for more information. Federal agencies are responsible for identifying and protecting the historic properties they own or control but there is no regulatory minimum standard for their maintenance. Section 110 of the National Historic Preservation Act requires federal agencies "to assume responsibility for the preservation of historic properties which are owned or controlled by such agency" and "such properties under the jurisdiction or control of the agency as are listed in or may be eligible for the National Register are managed and maintained in a way that considers the preservation of their historic, archaeological, architectural, and cultural values in compliance with section 470f of this title... ." Section 110 does not have implementing regulations and does not set a minimum maintenance standard. |

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| 532 (CCAC 30) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 2.3.2. In the consideration of relocating the federal courthouse to a space that eliminated almost all of the extraneous security risks associated with being in a high-density urban center, can we discuss further what those costs could be? It appears that we are being asked to go with the lowest and cheapest option, due to the potential associated costs – not because it is in the best and most balanced interest of the parties involved in this conversation. The language in this document puts a great deal of weight on costs as a factor in these decisions. While a fiscally responsible decision is the expectation from all levels of our government, we have to ensure it is balanced against the many, nuanced community considerations as part of the greater collective decision-making process. | GSA has not developed a cost estimate of relocating the Dirksen Courthouse any further than what is discussed in Section 2.3.2. The cost would far exceed that of adaptive reuse or demolition of the buildings. Additionally, relocating the Dirksen Courthouse tenants would raise the question of what to do with the Courthouse, which is also a historic building. As noted in Section 1.3.3, GSA has not identified a federal need for the buildings at 202, 214 and 220 South State Street, so therefore finding a federal use for the 1.4 million square foot Dirksen Courthouse would be unlikely. |
| 532 (CCAC 31) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 2.3.3. Things have changed considerably since the studies on this course of action were completed. At the first charrette, consulting parties reviewed analysis on currently underutilized federal spaces and potential consolidation into the subject properties. From a preliminary review, this seems like an option that should continue to be vetted with equal rigor as potential demolition plans for the two historic structures. This would help the GSA comply with a reduction in the footprint mandates as well. | GSA's portfolio plan does not align with federal use of these properties as we optimize our footprint. |
| 532 (CCAC 32) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 2.3.5. Not the most critical issue here, but it is not essential that the federal government maintain ownership of the subject properties. The federal government does not own the Marquette Building or the Citadel. We will continue to raise this issue throughout the report, and raise objections to the 15 prohibited uses. The main barrier to the federal government selling this property is its extraneous prohibited uses list in the name of security. | GSA and federal law enforcement have determined that federal ownership is an important part of maintaining security at the Dirksen Courthouse. Refer to Section 1.3.1 of the Final EIS. |
| 532 (CCAC 33) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 2.3.6. This failed adaptive reuse is an example of how untenable the GSA's security requirements are for reuse. A further "hardening" of the Dirksen Federal Courthouse, with ballistic glass and other implements, and the security list becomes significantly shortened. | Final EIS Section 3.7.2.1 discusses demolition debris. The demolition debris, without reuse or recycling, would account for approximately 0.23 percent of Chicago's permitted landfill capacity. With reuse and recycling, the amount would be reduced to 0.05 percent of capacity. The solid wastes generated would be an increase from existing conditions but would not exceed the capacity of local landfills. Demolition debris would be managed in accordance with applicable regulations and would be disposed of at appropriately licensed facilities with capacity. The Demolition Alternative would result in a negative, minor to moderate, long-term impact to landfills from the demolition-related solid waste. |
| 532 (CCAC 34) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.1.1. The security threats argument to support this proposed action is difficult to assess. When we request additional information, we are told we cannot have it—or that information cannot be supplied, as it's a security risk to share that information. When we share models of what has worked in other places as alternatives to demolition, the conversation and case keeps returning to demolition as the only viable alternative. Real world experience in this realm of work tells us differently. We have remarkable and collective experiences and examples of reuse options that can lead us to viable solutions to the challenges of reusing the subject properties. | GSA considered a viable reuse alternative in the Final EIS. GSA has never stated demolition is the only alternative. |

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| 532 (CCAC 35) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.1.3. It is alarming to see language in this section indicating that the federal government will only act upon the decisions made in this 106 process, not intending to respect the outcome of a Chicago Landmark designation prohibiting demolition. This language could be seen as steering the process and even challenging the City of Chicago to step back. We would like to see this language reconsidered. Can we talk about the balance of power in the republic to which we all stand? The federal government should be working collaboratively with state, county, township, and city governments, where they have to find solutions that work for everyone. Subject matter experts, not funded by the GSA, should be respected for their contributions to a reasonable resolution. Landmarking these subject properties is not a ploy to win. It is a legitimate tool to ensure that whoever owns these buildings (unless they are an active house of worship), can have their property Landmarked without their consent. Even if a property owner does not consent to a Chicago Landmark designation, they still have to comply with the Chicago Landmark Ordinance requirements and honor the laws of the City of Chicago. Those same principals should be honored with the Century and Consumers Buildings, which are part of the architectural legacy of Chicago and the nation. It is our opinion that the federal government should be respectful of such important laws and designations, and not try to supersede such laws and determinations. | Although the U.S. Government is not legally bound to any obligations attendant to landmark designation, GSA addressed this in an official letter sent in response to the Commission on Chicago Landmarks regarding the proposed Preliminary Landmark Recommendation for the Century and Consumers buildings on April 13, 2023. The letter stated “GSA has long acknowledged the historic and architectural significance of these historic properties. We recognize that these two buildings are identified as contributing properties, under Criteria A and C at the local level of significance, to the National Register of Historic Places-listed, Loop Retail Historic District. As such, local significance is acknowledged and considered during the consultation process required by Section 106 of the National Historic Preservation Act (NHPA)... GSA is formally neutral on the Commission’s proposal to designate the buildings as landmarks under the Commission’s criteria.” As stated in Section 3.1.1.3 of the Final EIS, GSA has taken no position and is formally neutral on the Commission on Chicago Landmarks proposal to designate the buildings as landmarks under the City of Chicago's local landmarking process. As a federal agency, GSA is legally bound to follow the federal Section 106 process to its conclusion, regardless of local processes. The outcome of Section 106 will be stipulated in the Programmatic Agreement, which will be legally binding. The City of Chicago's local landmarking process is outside of the Section 106 process, but the City has actively participated in the Section 106 consultation. |
| 532 (CCAC 36) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.1.3. Further in this section, in the discussion of the Loop Retail Historic District, we appreciate the GSA including 214 as contributing to this District for the sake of this undertaking. Because we are collectively evolving in our awareness of historic preservation, we understand that even poor-quality and remodeled façade makeovers can be reversed, with a building’s principal, original elevations restored. It is with that growing awareness of what historic preservation can accomplish for communities that we embrace opportunities like this example, to use it as a tool and to reevaluate conditions that may not be visible below these various remodellings, covering a historic structure. | Comment noted. |
| 532 (CCAC 37) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.1.3. In the discussion of the Chicago Federal Center Complex, this is the first mention of Alexander Calder’s Flamingo—a very seminal work of art. We ask that his name and the date of its creation, installation and dedication, all be mentioned here. It is mentioned later in the document, but it should be also inserted here. | Calder’s name is already noted in Section 3.1.1.3, as is the year it was installed. GSA feels that provides enough context for readers and has not added specific dates of its creation, and dedication. |
| 532 (CCAC 38) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.2. The GSA notes in this section that the transfer of the property from a federal entity to a non-federal entity is deemed an adverse effect. We challenge that presumption. Most of the thriving buildings in the surrounding areas are non-federal and appear to be doing much better than the subject property in their management. The language here needs to be reconsidered. | The EIS provides an abbreviated list of examples of adverse effects taken from 36 CFR Section 800.5(a)(2) <i>Examples of adverse effects</i> . Item vii addresses the transfer of a federally owned property to a nonfederal entity and, in addition to the text included in the EIS, states that the action will be adverse if it occurs “without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.” |
| 532 (CCAC 39) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.2. We would like the Illinois State Historic Preservation Office to issue an updated letter of determination as to whether this property ranks at the local, state, or national level of significance. These buildings rise to an international level of significance, especially with a UNESCO World Heritage site nomination pending. | 201 and 220 South State Street are currently not under review by UNESCO for the World Heritage program. In 2017, a preliminary group of nine primarily commercial buildings in Chicago’s central business district, the “Loop,” were submitted by the U.S. Department of the Interior to the UNESCO World Heritage Tentative List. This means that the proposal is potentially eligible for future nomination by the U.S. Department of the Interior for UNESCO consideration. The commenter will need to discuss their request for an updated letter with the Illinois State Historic Preservation Office. |

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| 532 (CCAC 40) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.2.1. In the discussion about the Loop Retail Historic District, the language should be changed from “could” to “will”: “Therefore, impacts to the Loop Retail Historic District would be negative, moderate, and long term under NEPA. Because of the loss of character-defining features, effect on the Loop Retail Historic District will have a significantly adverse under Section 106.” | GSA has not made a decision yet on which alternative it will select. Thus, GSA does not know whether the impacts noted in Section 3.1.2.1 will occur or not. Thus, the impacts are referred to as ‘would’ rather than ‘will.’ NEPA guidance prepared by the American Association of Highway and Transportation Officials discusses the appropriate use of “would” and “will” this way: “The verb tense in a NEPA document should be consistent with the status of the lead agency’s decision regarding the alternatives. The word “would” convey that a decision has not yet been made; the word “will” conveys that a decision has been made. Therefore, as a general matter, “would” should be used when more than one alternative remains under consideration; “will” should be used in a NEPA decision document when referring to the selected alternative.” Refer to https://environment.transportation.org/wp-content/uploads/2021/05/pg15-1.pdf . |
| 532 (CCAC 41) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.2.1. The Federal Center impact needs additional language noting that the Chicago Federal Center was designed by its architect, Ludwig Mies van der Rohe, very specifically in the context of its neighboring buildings, and even honoring them. The glass and visual breezeway from the Post Office and Calder’s Flamingo, through the federal courthouse, and providing the principal public access beautifully upon the sight of the subject properties. The impact of the demolition of these subject properties will be negative, significant, and long term. We need to look less on things individually and consider the depths of the whole architectural composition and its impact on the Loop Retail Historic District, as well as Mies van der Rohe’s Chicago Federal Center. Both are seminal works of art and architecture, recognized on the world’s stage. The loss of the Century and Consumers Buildings has the potential to be a significant public embarrassment to the GSA/federal government, as well as the City of Chicago, on a world scale. | To be a significant impact, the project would need to result in “substantial loss of integrity, and/or severe alteration of property condition.” A change to the setting from the demolition of 202, 214, and 220 South State Street would not cause a substantial loss of integrity – no physical loss of materials, design or workmanship would occur; the association with Mies van der Rohe would remain intact; the location would be unchanged; the feeling and setting would suffer some loss of integrity which results in the negative, moderate, long-term finding. When designing the Chicago Federal Center, Mies van der Rohe took into consideration the historic buildings that surrounded the site and used their layout, forms, and architectural details to guide his own work. Possibly the most significant outcome of this process was his decision to sheath the buildings with dark, reflective glass that mirrored the façades of the existing buildings. By incorporating this detail, Mies van der Rohe was able to balance the juxtaposition of the sleek modern buildings with the more elaborately detailed buildings that surrounded it. This detail also served to honor the buildings, reflecting them, instead of overpowering them. Mies van der Rohe also used the layout and scale of the surrounding buildings to dictate the layout and scale of the federal center. Such decisions include constructing the Dirksen Courthouse to fill the west half of the block between South Dearborn Street and South State Street and aligning its front and rear entrances with Quincy Court to the east. On the east, this alignment serves as a pedestrian-only corridor extending from State Street to the rear entrance and bordered on the north and south by the Consumers Building and the Benson and Rixon Building. The height of the two skyscrapers also reflects the height of the buildings around them with the shorter, 382-foot-tall Dirksen Courthouse standing adjacent to the 185-foot-tall Century Building and 291-foot-tall Consumers Building while the taller, 545-foot-tall Kluczynski Building stands closer to the 476-foot-tall Bankers Building. Section 3.1.2.1 of the Final EIS has been updated to note “Changes to setting from removing the Century and Consumers Buildings and 214 South State Street would result in visual changes that would affect the integrity of setting and design of the Chicago Federal Center and its contributing resources, <u>particularly given the importance of the setting to Mies van der Rohe’s design.</u> ” |

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| 532 (CCAC 42) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.2.1. The Historic Michigan Boulevard District, the West Loop-LaSalle Street Historic District, and the South Loop Printing House Historic District impact will be negative, moderate, and long term. Again, we have to see the whole. The story of Chicago’s historic built environment is interwoven throughout its streets, regardless of what artificial boundary was agreed upon by architectural historians 10 or 40 years ago. When a significant piece of that history is erased, the whole story grieves that significant loss. We cannot minimize what demolition would mean to these particular historic districts, nearby designated Chicago Landmark buildings and the downtown as a whole. | GSA acknowledges these historic districts are within the defined APE. To be a moderate impact, effects would need to result in some loss of historic integrity. The demolition alternative would not threaten or impact the NRHP eligibility of these particular districts in any way. Additionally, GSA acknowledges that the boundaries of the historic districts are not always definitive features separating one area from another, but artificial lines that attempt to categorize and group the different sections of downtown Chicago into smaller parts with similar architecture, functions, context, and significance. These unique qualities both distinguish each area from one another and also add additional significance and historical context to the downtown as a whole. Per Section 106, this evaluation assessed the effects of the undertaking on NRHP-listed or eligible properties, including the surrounding historic districts and individual properties. Adhering to the Section 106 process and assessing the surrounding area through the lens of individual properties and districts allowed for in depth consideration of the vicinity by providing different and specific vantage points and highlighting a variety of areas of significance. The assessment considered how demolishing 202, 214 and 220 South State Street might negatively affect the integrity and significance of the identified historic properties and the important roles they play in the story of downtown Chicago. This assessment determined that even if 202, 214 and 220 South State Street were demolished, the surrounding historic districts and individual properties would still convey their significance, both in relationship to each other as well as to the overall story of Chicago. Additionally, though this assessment does not take into consideration all of downtown Chicago, it does consider the history of the surrounding area and the chapters of Chicago’s history to which the subject properties belong. |
| 532 (CCAC 43) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.2.1. On impact to National Historic Landmarks, we need to stop saying we are measuring impacts unless we are considering the people who will miss these buildings, the stories that will have to be told without them present, the people who will never know the glory of looking down State Street at these glorious beacons, or glimpsing them through the MidCentury Modern glory that is the Chicago Federal Center. If we are not considering these tangible impacts, we are not measuring enough and hence the process and vision is flawed. | While the GSA understands these concerns, it is required to follow specific provisions under Section 106 of the NHPA and its implementing regulations, “Protection of Historic Properties” (36 CFR Part 800) as well as Section 110(f) of the NHPA (54 U.S.C. Section 306107), which outlines the specific actions that an agency must take when National Historic Landmarks may be directly and adversely affected by an undertaking. There are National Historic Landmarks within the APE, and GSA considered the effects of the proposed action on them. The Century and Consumers buildings are not National Historic Landmarks. Section 3.1 discusses impacts on the cultural resources themselves. Section 3.2 of the EIS addresses visual impacts to those who view the buildings at 202, 214 and 220 South State Street. |

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| 532 (CCAC 44) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | <p>1. Please remove the suggestion here that the adaptive reuse of the subject properties “could appreciably alter resource characteristics with some noticeable loss of integrity.” It is likely that the 106 process for the adaptive reuse will be significantly less challenging than one for its planned demolition. It will likely be a designated Chicago Landmark within a matter of months, and the GSA can be assured that Chicago will continue to honor and care for its Landmarks. We Consulting Parties are not going anywhere.</p> <p>2. GSA must change the language of impact from beneficial, moderate, long-term under NEPA to beneficial, significant, long-term and from</p> <p>3. some vague language about taking care to minimize impacts under NHPA to a beneficial, significant, long-term impact.</p> <p>4. The impact to the Loop Retail Historic District would be at least beneficial, moderate, long-term and not minor as suggested here. Please alter that language. We would like to discuss further that it is in fact significant to revive grand historic structures and bring them back to vibrant use.</p> | <p>1. The alterations to the buildings that may be necessary to satisfy the security needs of the Dirksen Courthouse or to facilitate a new use is unknown and “could appreciably alter resource characteristics with some noticeable loss of integrity.” This is not to say that adaptive reuse “will” cause alterations and loss of integrity, but to acknowledge that it could, to an unknown extent, cause alterations and loss of integrity. Adaptive reuse may not be able to follow the Secretary of the Interior’s Standards for the Treatment of Historic Properties in such a manner that would avoid all adverse effects. GSA must consider all potential impacts of each alternative.</p> <p>2. As defined in Table 3.1-2. Impact and Effect Thresholds for NEPA and Section 106, a <u>moderate impact</u> “would result in <u>some loss of integrity</u> and would be noticeable. Impacts could appreciably alter resource characteristics.” A <u>significant impact</u> “would result in <u>severe alteration of property condition</u>, the result of which would significantly affect the human environment.”</p> <p>Based on the definitions, the assessment categorizes the adaptive reuse of 202, 214 and 220 South State Street as having a beneficial, long-term impact that is noticeable with some possibility of loss of integrity. It is not expected to result in severe or extreme alteration of the properties or changes that would be significant.</p> <p>3. Language in the Final EIS has been changed to read “Although adverse effects under Section 106 are possible from changes made to accommodate viable adaptive reuse options, consultation would seek to minimize those effects <u>to the greatest extent possible</u>.”</p> <p>4. Table 3.1-2. defines a <u>minor impact</u> as one that “would be slight but noticeable. Impacts would not appreciably alter resource characteristics.” A <u>moderate impact</u> would “appreciably alter resource characteristics.”</p> <p>The assessment found that the adaptive reuse of the subject buildings would result in slight but noticeable changes to the overall Loop Retail Historic District. Because these three existing buildings are part of 75 contributing resources in the Loop Retail Historic District, their adaptive reuse is not expected to result in a moderate impact that would appreciably alter the characteristics of the historic district.</p> |
| 532 (CCAC 45) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.2.2. Other contributing buildings in the Loop Retail Historic District would be a beneficial, moderate, long-term impact and not negligible as suggested here. | <p>GSA acknowledges that changes to 202, 214 and 220 South State Street from adaptive reuse would be visible from the adjacent historic buildings and thus would be noticeable. Language in the final EIS has been changed to beneficial, <u>minor</u>, and long-term.</p> <p>Table 3.1-2. defines a minor impact as one that “would be slight but noticeable. Impacts would not appreciably alter resource characteristics.” A moderate impact would “appreciably alter resource characteristics,” which a positive, visual change to adjacent buildings would not do.</p> |
| 532 (CCAC 46) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.2.2. In every instance throughout this section, the impact of restoring two significant skyscrapers is being downplayed. There is nothing negligible about restoring these buildings and bringing them into a vibrant, 21st century use that keep the history alive and the future ever bright. | <p>Analysis of impacts is based on the characteristics of the historic properties, and how those significant characteristics could be affected by the adaptive reuse of the existing buildings at 202, 214, and 220 South State Street. Negligible in this context means little to no noticeable effects to historic properties, so that is a positive for the resources. Refer to Table 3.1-2, Impact and Effect Thresholds for NEPA and Section 106.</p> |
| 532 (CCAC 47) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.1.3. It is encouraging to read that Consulting Parties will be involved in the development of mitigation measures. We would like to suggest the following narrative here: There will be little need for mitigation measures because the buildings will be adaptively reused and restored. The hardening of the federal courthouse window installation is underway, and the downtown is alive with a beautiful balance of old and new, tall and short, public and private. We have housing balanced beside office buildings and shopping districts. We have federal buildings across from other incredible works of architecture and history.” | Comment noted. |

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| 532 (CCAC 48) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.2. Is it best practice to use the Federal Highway Administration standards for visual impacts? Are there better standards? Should the GSA develop its own? When was the last time the FHWA standards were updated? How extensively? It's an ever-changing world in historic preservation. Should we argue here for the most up-to-date and nuanced standards the industry has now or needs to develop? | Currently, GSA does not have visual impact assessment guidance. Because of this, GSA reviewed the available federally related visual impact assessment guidance from the National Park Service, Federal Highway Administration (FHWA), US Bureau of Land Management, US Forest Service, US Army Corps of Engineers, US Bureau of Ocean Energy Management, and National Research Council. It was determined the FHWA guidance was most applicable because it offered the best available methodology for assessing potential building impacts. The FHWA guidance was originally developed in 1988 and was updated in 2015. GSA used the FHWA 2015 guidance for this analysis as stated in Section 3.2. |
| 532 (CCAC 49) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.2.2.1. We understand the complexity of trying to measure the value of how long someone looks upon these historic structures, but if we are going to distinguish between the people who look at it longer (adjacent office workers) and those who may only be passing by, do we also need to consider whether a person walking can enjoy it more substantively than a person on a bicycle and more so still than someone passing in a bus or car? And how do you measure the value of the occasional person who will have "their breath taken away" for just a moment when they first cast their gaze up at the glory that is 202 and 220 South State Street? | Section 3.2.1.3 of the Draft EIS stated that "The neighbor viewer group would likely have views of 202-220 South State Street from office windows on both South State Street and Adams Street but would be limited to a small number of buildings with a direct line of sight." It is reasonable to assume that office workers would not spend the majority of their time at work gazing upon 202 and 220 South State Street as they would be focused on their work. Section 3.2.1.3 also states that "Pedestrians and bicyclists would have the most prolonged view of 202-220 South State Street due to their lower speed and ability to pause and absorb the visual characteristics of the buildings. Transit riders and vehicle drivers/passengers have more fleeting views of 202-220 South State Street due to a reduced field of vision, and limited view in the vehicle as well as a higher speed of travel." To answer the commentor's question, it is already stated that pedestrian and bicycle viewers would likely have the most prolonged view of 202 and 220 South State Street. To address this part of the comment, GSA has added the following to Section 3.2.1.3 of the Final EIS – " <u>It is reasonable to assume that pedestrians would have a better ability to pause and gaze upon the buildings located at 202-220 South State Street versus a person on a bicycle. Pedestrians can be separated into commuters on foot who are going to/from work and are common to the area versus part time tourists who are in the area for personal enjoyment reasons.</u> " |
| 532 (CCAC 50) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.2.2.1. On the subject of landscaping, this section suggests that a flat, green space would be compatible with adjacent land uses because there are other flat, green spaces nearby. This does not read like an enlightened perspective on best practices in land use planning for the 21st century. Please remember that nearby Pritzker Park, also located on South State Street, is to be redeveloped with a new structure, as it is another failed "pocket park" project. One can also look at the failures of "Block 37" in Downtown Chicago, cleared of historic buildings and became "a landscaped eyesore" on State Street for more than 25 years. The best solution is to retain the Century and Consumers Buildings, and to restore their terra cotta and find a suitable reuse for these amazing buildings, which are so much a part of Chicago's architectural legacy and historic built environment, which are unique to Chicago and only Chicago. | The Draft EIS document equally evaluated Alternative A Demolition and Alternative B Viable Adaptive Reuse. Under the Demolition Alternative, the new flat ground-level landscaped plaza would be implemented post demolition and would be an open space, possibly open to the public, with landscaping in compliance with GSA and U.S. Courts design guidelines, Interagency Security Committee (ISC) standards, and USMS Publication 64. Other amenities such as seating and bollards to control access points would be determined later. GSA would coordinate with the SHPO, City, and other consulting parties on the design for the plaza. This coordination would likely result in stipulations included in the Programmatic Agreement |
| 532 (CCAC 51) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.2.2.1. The final assessment that demolition will have a negative, minor-to-moderate, long-term impact does not reflect reality. First, lease commit to either minor or moderate, but more importantly, acknowledge that the erasure of these two beautiful skyscrapers will have a significant, long-term negative impact. | The last paragraph of Section 3.2.2.1 has been revised to state "The Demolition Alternative would result in a <u>long-term negative impact at the project site, that would range from minor to moderate, based on the viewer activity, viewer sensitivity to change, viewer location, and duration of view. The character of the surrounding Loop Retail Historic District would be maintained resulting in an overall moderate impact regarding aesthetic and visual resources.</u> " |
| 532 (CCAC 52) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.2.2.2. The suggestion that the viable adaptive reuse of the subject properties will have no long-term impact on the visual and aesthetic resources needs to be changed. Beneficial, significant or moderate at least, and long-term. | The last sentence of Section 3.2.2.2 has been revised to state "For these reasons, the Viable Adaptive Reuse Alternative would result in a <u>beneficial</u> , long-term impact to aesthetic and visual resources at the project site and in the surrounding area." |
| 532 (CCAC 53) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.2.3. It continues to come back to a false narrative that there is only the option of altering or eliminating the subject properties to get to the best security outcome for the federal courthouse. We must fully vet as a community the options of alterations as well to the federal courthouse itself. This section needs to reflect that approach. | The Final EIS equally evaluated Alternative A Demolition and Alternative B Viable Adaptive Reuse. The mitigation measures described in Section 3.2.3 outline that future coordination is planned to occur depending on the selected alternative. |

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| 532 (CCAC 54) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.3.1.2. Zoning. Is a vacant and landscaped lot the highest and best use for a downtown site at the corner of State Street and Adams? Parks are a great asset to communities, but there are significant parks along the Chicago Lakefront nearby, and there are wonderful pocket parks even closer. This section should not read as if a pocket park is compatible with nearby zoning. We do not need another pocket park in the name of security, not when there are viable alternatives that get us all to a place where we want to be. | GSA agrees a vacant lot is not the highest and best use of this property. Section 3.3.1.2 of the Final EIS does not suggest that a vacant lot is the highest and best use of the property. |
| 532 (CCAC 55) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | Table 3-3-1. It could be noted in the definition of significant impact if a property goes from a skyscraper (its current zoning) to a vacant lot. It is a massive underutilization of zoning potential in areas designed for density. Demolition of these skyscrapers needs to be clearly acknowledged in this document as running counter and illogical to all local comprehensive plans. | Section 3.3.2.1 of the Final EIS notes the Demolition Alternative is not consistent with relevant land use plans and would have a negative, significant, long-term impact to land use. |
| 532 (CCAC 56) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.3.2.1. We do not agree with this assessment that demolition of historic skyscrapers for a landscaped vacant lot is what We Will Chicago had in mind when it was talking about expanding green space. Please alter this language to reflect reality. Further language that demolition of the subject properties “may inhibit plans to reinvigorate” State Street is an affront to sensibilities. Please adjust accordingly. | This sentence has been removed from the Final EIS. The sentence “...may limit options for business and retail mix” was changed to “would be detrimental to a stretch of State Street that is “already struggling” (ULI Chicago 2023).” This section has been updated in the Final EIS to not include Chicago Loop Alliance planning goals in the impact determination. |
| 532 (CCAC 57) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.3.2.1. Has the Chicago Loop Alliance consented to the characterizations in this section? This section could be informed by their expertise and collective works reviving downtown and restoring a vibrant play, to live, work, and play. | The Chicago Loop Alliance did not comment on this section in the Draft EIS. This section has been updated in the Final EIS to not include Chicago Loop Alliance planning goals in the impact determination. |
| 532 (CCAC 58) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.3.2.2. In comparison to demolition or demolition by neglect, the retention of fully restored buildings should be noted as a beneficial, significant, long-term impact. | The Final EIS reflects that the Viable Adaptive Reuse Alternative would be a significant benefit to land use. |
| 532 (CCAC 59) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.3.2.3. We challenge the assertion that the continued decay of two skyscrapers in a no action alternative will have no impact on land use. Vacant and decaying is valued and impacted differently than fully restored and placed back into a community use. The Century and Consumers Buildings are essentially “The Reliance Building-in-waiting,” as the Reliance Building was in a much more deteriorated state and condition than the Century and Consumers Buildings. The Reliance Building’s restoration has had a profound impact on State Street, the entire Downtown area of Chicago, in addition to added recognition and tourism for our local economy and City. Imagine the preposterous notion that the Reliance Building is not significant in the history of architecture and could be demolished, as there are many similar comparisons to the Century and Consumers Buildings. The GSA needs to acknowledge their responsibility to these structures after 18 years of ownership and plan for a sensitive rehabilitation of these historic buildings. | All comments regarding the No Action Alternative have been noted, included in the administrative record, and taken into consideration. If the No Action Alternative is selected GSA will re-evaluate its effects. However, the Final EIS Section 2.2 notes the No Action Alternative would not meet the project’s purpose and need and is used as a baseline to evaluate impacts of the Alternative A, Demolition and Alternative B, Viable Adaptive Reuse. This is consistent with the National Environmental Policy Act (NEPA) process. |
| 532 (CCAC 60) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.4. In general, this section on community facilities is an amenities list of a marketing piece for future housing that could go into a fully restored Century and/or Consumers building. | Comment noted. |
| 532 (CCAC 61) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.4.1.1. The summary of the schools in this community facilities section makes a good case for the need for housing in the immediate area. Imagine if that restriction were lifted from the prohibited used list, what the possibilities are to support and further grow these thriving community facilities. | Comment noted. |

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| 532 (CCAC 62) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.4.2.1. In this discussion about impacts on community facilities if the subject properties are demolished, how can it be projected that the impact will have “potential minor or moderate beneficial long-term impacts”? The elimination of future jobs, future residents, economic growth, growing heritage tourism, more users for public transit and community facilities. How does demolition of the subject properties not result in significant, long-term, negative impacts? | Refer to response to CCAC comment number 5. |
| 532 (CCAC 63) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.4.2.2. And in a reverse of the previous point, how can it be determined that the revitalization of these historic skyscrapers will have no long-term impacts on community facilities? It rings of extreme lack of vision to reach the assessment in this report. We have stories across the world of the power of historic preservation to spark the revitalization of community. This report should reflect the energy of that movement. | This section has been updated in the Final EIS to reflect a minor, long-term beneficial impact from viable adaptive reuse. |
| 532 (CCAC 64) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.4.2.3. The assessment that no community facilities will be impacted by the no action alternative also smacks of outdated perspectives on planning and community. Ask anyone who lives, works, moves, plays, or visits an area in the vicinity of vacant and decaying communities if they experience that site as beneficial or negative? It is also worth noting that neighboring property value is lower next to vacant lots but increases next to positive reuse. | This rating reflects that the buildings are currently vacant and unused. Therefore, their continued vacant and unused status would not be a change from current conditions. There would be no change, and therefore no impact. |
| 532 (CCAC 65) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.4.3. This section indicates that no mitigation measures are required. How is that possible? There is nothing in this report that suggests there will be no need for mitigation. | There is no regulatory requirement to mitigate impacts to community facilities. Because the negative impacts would be short term, GSA will not mitigate those impacts. |
| 532 (CCAC 66) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.1.1. In the income discussion here, it compares income groupings for Cook County below \$25,000 and above \$150,000 but only above \$100,000 for Chicago numbers? Is it possible to compare the same numbers for both the County and Chicago? In Table 3-5-3 that follows, the income is broken out similarly, but it would be good to have the narrative reflect that applies to apples comparison. | Section 3.5.1.1 of the Final EIS has been updated as requested. |
| 532 (CCAC 67) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.1.4. Heritage tourism. In this conversation about the UNESCO World Heritage site, the narrative needs to reflect reality. In the course of developing the sites to include in this comprehensive process of nominating a World Heritage site, a number of choices had to be made based on current owner consent and keeping the number of nominated properties to a manageable number. That being said, there is a full expectation amongst the collaborators that if/when the nomination is accepted, there will be opportunities to add additional sites important to the evolution of the skyscraper. The Century & Consumers buildings are an essential part of that history. | 201 and 220 South State Street are currently not under review by UNESCO for the World Heritage program. In 2017, a preliminary group of nine primarily commercial buildings in Chicago’s central business district, the “Loop,” were submitted by the U.S. Department of the Interior to the UNESCO World Heritage Tentative List. This means that the proposal is potentially eligible for future nomination by the U.S. Department of the Interior for UNESCO consideration. |
| 532 (CCAC 68) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.2.1. Downplaying the long-term impacts from the demolition of the subject properties does not serve anyone in what should be a transparent and collaborative process to find the best solutions to meet the needs of the GSA security team and the people who love the power of keeping history alive through a healthy combination of stories, pictures, and a retained built environment. It does mean that we need to do our very best to protect and steward the structures that are vitally significant and should be saved and honored. | The comment does not indicate how Section 3.5.2.1 downplays the long-term impact of demolition. Section 3.1.2.1 indicates that demolition would have a negative, significant and long-term impact on the buildings at 202, 214 and 220 South State Street and a negative, moderate and long-term impact on the Loop Retail Historic District. |

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| 532 (CCAC 69) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.2.1. The narrative on the impact of heritage tourism comes off as so disingenuous. To suggest that it's challenging to measure the specific impact on heritage tourism if two currently vacant and neglected buildings were demolished would eliminate the need to discuss the impact on heritage tourism going forward for the consideration of almost any building. Unless there are ticketed tours being offered, how can we measure the impact of heritage tourism specifically to any one building, and is that the measure we should be focusing on? We know that heritage tourism collectively brings big dollars to communities, so can we safely assert that demolishing historic skyscrapers in a downtown renowned for its skyscrapers will negatively impact heritage tourism? Instead of "Here is where it happened," tours will say "Imagine once the glory that stood on the site of this lot now landscaped with hostas and Kentucky bluegrass." Which tour would you buy tickets to attend? | Section 3.5.1.4 discusses the importance of heritage tourism generally and in Chicago, and Section 3.5.2.1 acknowledges that there would be a negative, minor, long-term impact to heritage tourism from Alternative A, Demolition. There is no way to quantify in dollars the loss to heritage tourism from demolishing these buildings, but the Final EIS makes an impact determination. There is limited direct tourism associated with these buildings based on the architectural tours offered in the Loop, which is the best measure available to help determine the impact to heritage tourism from demolishing these buildings. |
| 532 (CCAC 70) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.2.2. \$407 million to restore the subject properties appears to be highly inflated and impossibly and absorbently expensive. We would like to see some more information included in this report about the source of that estimate and a breakdown of specific costs, along with a second quote and cost comparisons to other historic terra cotta structures in the Downtown area. We see the footnote, but most people are going to skip the footnotes. Please lay out in clear language in this document the sources and assumptions and math behind this number. Did it include a specific assumption on interior buildout? For what end use? We will never discourage the sharing of too much information. That is the basis of transparency. | GSA will not be completing a second cost estimate. GSA's conceptual estimate is available for further details on our public website. |
| 532 (CCAC 71) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.2.2. In the breakout of annual positive financial impacts with redevelopment, please add up the cumulative impact just during the long construction period. Annual numbers are impressive. The cumulative numbers are incredible. | Adding up the annual values over 4.5 years (simply multiplying the low-end values in Table 3.5-8 by 4.5) would not provide additional value to the analysis. The impacts would still be considered short-term, as they would not extend beyond the estimated 4.5-year construction period. The following sentence has been added to the Final EIS to address this comment: "Assuming a longer (54-month or 4.5-year) construction period, there would be a total increase of approximately \$174 to \$196 million in total labor income and \$600 to \$675 million in total industry output over the 4.5 years." |
| 532 (CCAC 72) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.2.2. Language on the math behind the total industry output seems almost dismissive about its impact. To show an impressive number like \$133 million to \$150 million annually and then note the impact would be minimal because it only represents .05 and .06 percent of the entire industry output for all of Cook County. Ask the Chicago Loop Alliance or the Mayor Brandon Johnson if a, let's just say, \$407 million investment in these buildings would be good for the City of Chicago, Downtown, and the community facilities in the neighborhood. | To make an objective impact determination, GSA put the numbers in context. When the numbers are put into context, they make up a very small percent of the total personal income and total industry output in Cook County. Therefore, GSA determined that the short-term economic benefits would be minor. |
| 532 (CCAC 73) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.2.2. As this section moves into the long-term impacts of adaptive reuse, it is noted the assumptions are based on an office reuse. Even though housing has the potential to generate significant long-term benefits to the area, it is a prohibited use. Again, this prohibited use list needs to be reconsidered. Can the GSA, for the sake of informed conversation, do a similar economic analysis of the buildings as an end to housing use? Do you already have those numbers? It would be worth discussing how we can balance security needs with community needs and benefits. We are not federal courthouse security experts, but we do have some experience in the composition and construction of large buildings. Perhaps we can work together to find a solution that gets both of our agencies to a positive outcome. | It is not reasonable to evaluate potential long-term economic benefits from residential reuse currently since it is not feasible under the viable adaptive reuse security criteria. If residential reuse becomes an option for reuse of these buildings in the future, GSA will then assess the long-term economic benefits. |

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| 532 (CCAC 74) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.2.2. The language is again hinting at dismissiveness about the potential tax benefits of getting the subject properties back on the tax roll. When the language is limited to what percent of the total tax revenue for Cook County this represents, it does not reflect the powerful impact of these beautiful buildings being filled again with jobs, visitors, workers, business owners, maybe one day residents who work, school, play, and even retire adjacent to the thriving culture and resources in the neighborhood as detailed in this report's own Community Facilities overview. It is always a beneficial and significant long-term impact to have the real estate taxes generated from restored buildings, the jobs created, the money spent on entertainment and dining and culture. Heritage tourism, though it does not have a way to be measured specifically for the long-vacant and neglected subject properties, will benefit from revitalized historic buildings. We should not call it anything short of extraordinary. | To make an objective impact determination, GSA put the numbers in context. Like other economic indicators, the leasehold tax paid by the leaseholders for the three buildings at 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. These buildings would have a beneficial impact to the City's tax base, but the magnitude of the impact would be minor given that the project consists of three buildings among thousands in this dense, urban environment. The Final EIS acknowledges that there would be a direct benefit to heritage tourism from Alternative B, Viable Adaptive Reuse. |
| 532 (CCAC 75) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.2.2. Here is another understatement of the potential for impact on heritage tourism. Each time a single property (or two) is considered all on its own, the loss of that one place can be categorized as minimal. Please consult any study done by the National Trust for Historic Preservation or Place Economics on the impact of historic preservation and heritage tourism. Perhaps the GSA could consult one of these national subject matter experts to help draft this EIS. | Section 3.5.2.2 only considers the direct impact of Alternative B, Viable Adaptive Reuse on heritage tourism. Section 4.2.5.2, which analyzes the cumulative impacts of Alternative B, considers other past, present, and reasonably foreseeable future actions. Because Alternative B would not change key character-defining features of the three buildings, there would be little direct impact on heritage tourism. The buildings would remain. Therefore, GSA concluded that Alternative B would have a beneficial, minor, long-term direct impact on heritage tourism. |
| 532 (CCAC 76) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.5.2.2. On the subject of environmental justice, we ask the GSA to insert a scenario where the adaptive reuse is done with the highest green standards for long-term sustainability. This could be an extraordinary benefit to the environmental justice movement: less pollutants, low-impact/locally sourced materials, state-of-the-art energy efficiency and internal air quality standards. If we can think outside of the box, we can reach some amazing common ground to turn this revitalization into much more than just a historic preservation victory. | At this time, the design details of Alternative B are unknown, and the scenario suggested would be speculative. Therefore, it is not reasonable to conduct an analysis based on such a scenario. If Alternative B is selected, GSA will strive to ensure the building design is based on green standards with an emphasis on long-term sustainability to the extent practicable. |
| 532 (CCAC 77) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.6.2. Just before Table 3-6.2, this report makes an excellent point that adaptive reuse saves 50% to 75% of embodied carbon compared to new construction. This is an excellent point, and it should be weighted more significantly than it appears to be in this document. | Adaptive reuse does save significant embodied carbon compared to new build since most of the embodied carbon emissions are in the concrete foundation and steel support structure of the building, which are typically maintained during re-build. If new construction were an option following demolition of the buildings, then this would be a critical factor to consider. However, due to the limitations on the property because of the adjacent Dirksen Courthouse, new build is not an option. As such, the embodied carbon emissions for the demolition option are limited to the backfill material and any concrete that may be used in the landscaping/cover following demolition. This is estimated at 300 tonnes of CO2, compared to 4,400 tonnes of CO2 embodied carbon emissions for the adaptive re-use scenario. |
| 532 (CCAC 78) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.6.2.1. When we are talking about greenhouse gas emissions, we object to two things here. First, either pick minor or moderate. There is a wide range within each choice, and it seems hard to accept that it is not possible to be more clear about impacts. But to our second objection, to suggest that the short-term impact would be anything short of significant runs contrary to best practices and knowledge in the industry of buildings. | The minor or moderate scale is based on the context. In the context of total Cook County emissions or City of Chicago emissions, the construction activity emissions due to both demolition and adaptive reuse are minor. Similarly, EPA mandates GHG reporting for companies that exceed 25,000 tonnes of GHG – the estimated emissions from these activities are minor in comparison to that threshold. However, in the context of net zero targets and clean energy targets, both scenarios do result in an increase in emissions that would not otherwise happen in the "do nothing" scenario. With that context, GSA has updated the short-term impact to be significant. |

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| 532 (CCAC 79) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.6.2.1. To suggest that the embodied carbon impact of demolition would be negligible again is counter to what we know about the distinctions between demolition and reuse. We need a proper assessment of the carbon impact comparing demolition of the subject properties as compared to their adaptive reuse. | A thorough GHG assessment of the demolition impacts was conducted and is included in the Final EIS. Per response to CCAC comment 77 in this table, the site is restricted to what can happen following demolition. New construction is restricted. As such, embodied carbon emissions for the demolition scenario are limited to those resulting from backfill materials and any minor concrete that may be used in the final cover of the property. This was estimated to be 300 tonnes CO2. For the adaptive reuse scenario, the combined upstream material emissions from construction materials and mechanical, electrical and plumbing equipment for the adaptive reuse is estimated to be 4,400 tonnes CO2. |
| 532 (CCAC 80) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.6.3. This section suggests that the climate risk of demolition is less than for reuse because the duration of demolition is shorter. This climate risk assessment does not appear to include any impacts on air quality during demolition, reduced capacity in area landfills, and ongoing greenhouse gas emissions from landfill materials. Those omissions should be corrected. | Climate risk is assessed as the risks that climate hazards pose to the asset. The air quality risk thus is a possible impact on the surrounding environment, but the climate models do not show a clear correlation between climate change and the dust dispersion. Similarly, reduced capacity in landfills and ongoing GHG emissions from landfills are real impacts of the project on the environment, but they are not necessarily impacted by climate change projections, and hence are not treated as a climate risk to the buildings. |
| 532 (CCAC 81) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.7.1.2. This discussion of hazardous materials in the subject properties gives the impression that the GSA has not completed a thorough analysis of the existing buildings as they are advancing against logic for their demolition. We understand that things are exposed in demolition that could not be foreseen without physically removing walls, but are there petroleum tanks anywhere in the building? Where are they located? How many? If the GSA is certain there are no petroleum tanks in the building, why is this language here? There is an indication the roofing materials have not yet been sampled for ACM. Is that going to be done any time soon? No matter which direction these subject properties go, this assessment will bear useful information for planning and moving forward. ACM was “reportedly” confirmed after sampling at 214. It either was or was not confirmed at 214. Can the GSA correct this information in this report? | GSA have carried out some presence/absence hazardous materials investigations at an appropriate level for this stage of the project. Thorough hazardous building materials assessments, which GSA refers to as a Pre-Alteration Assessment, have not been completed. After GSA selects an alternative, additional surveys would be conducted to develop a Materials Management Plan appropriate for the preferred alternative and permitting requirements (refer to Final EIS Section 3.7.3). Additional clarification is provided below regarding the commenter’s additional questions: <ul style="list-style-type: none"> • As is true for any redevelopment project, the lack of complete historical building records for a property makes it impossible to certify that no petroleum tanks are present. Previously installed petroleum tanks may have been covered with building flooring or walls, and any associated visible equipment associated may have been removed. Therefore, the possibility that petroleum tanks remain in the buildings still exists. Draft EIS Section 3.7.1.2 on petroleum tanks states “it is possible that tanks were installed before records were kept.” • To limit damage to the roof from destructive sampling methodologies, roofing materials are generally not sampled prior to removal. Additionally, roofing materials are often identified in surveys as “presumed asbestos-containing materials (ACM)” as applicable disposal regulations allow Class I Non Friable Materials (a designation which includes roofing materials) to be disposed of with demolition debris. If the viable adaptive reuse alternative is selected, the roofing materials could be sampled to facilitate repair/replacement. • A review of available reporting indicated that ACM was confirmed by sampling at the 214 building. However, laboratory data for the sampling was not included in the reviewed report, so the term “reportedly” was utilized. |
| 532 (CCAC 82) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.7.2.1. In this discussion of the solid waste impact of demolition, we continue to see a great deal of would, could, and should language. We know a great deal about demolition impacts. Please be specific in describing this impact. It would also be helpful to see here what measures the GSA will be using, and at what cost, to implement the greatest recycling of construction materials? What will be the target percent of materials recycled? And once more, do not blend minor and moderate. When this entire list of impacts is assembled, the GSA can still assert that the negative impact will only be anywhere between the lowest of minimum and the highest of moderate? That’s a big range, and it doesn’t reach where it belongs -- significant. | Refer to response to CCAC comment 40 in this table for why “would” is used in discussion impacts. GSA will recycle as much material as possible regardless of which alternative is selected but the specific measures have not been developed yet, not has a recycling goal been developed. This typically occurs in the design phase. |
| 532 (CCAC 83) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.7.2.3. Asserting that a lack of construction debris means the no action alternative will not have a negative waste impact is short-sighted and false. The impact of the equivalent of demolition by neglect is slow and painful, but unchecked it absolutely is intended to lead to demolition. And the loss of historic fiber along the way will be painful and unhealthy to observe. | Under the No Action Alternative, as described in Section 2.2, the buildings would remain in place. Therefore. only minor amounts of debris would be generated. |

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| 532 (CCAC 84) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 3.10.2.1. The impact of demolition on children will be greater than minor as this report asserts. The impact of the noise and pollutants will be especially harmful on young, developing humans. With children, adolescents and university students living, staying, and visiting libraries in the immediate area, it is important we are clear on what this alternative would mean in real terms to the people who live, work, study, and play around it. | Section 3.9.2.1 discusses the impact of noise during demolition. Section 3.8.2.1 discusses air quality impacts during construction. |
| 532 (CCAC 85) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.1.1. Reading this section on impacts to the Loop Retail Historic District feels almost dystopian. Because there had already been significant deterioration in this historic district before 1998 and it was still intact enough to be listed on the National Register, we can go ahead and tear three more buildings down and it will not have a significant impact. We cannot keep chipping away at our history and expect it to also simultaneously stay intact. | GSA acknowledges the potential negative cumulative impact of Alternative A, Demolition, on the Loop Retail Historic District. It would result in some loss of integrity to the Loop Retail Historic District and would be noticeable. GSA has categorized the negative cumulative impact as moderate based on the direct impacts of Alternative A in combination with past, present, and reasonably foreseeable future activities of similar nature. The Loop Retail Historic District would retain its historic significance and designation if Alternative A is selected. If Alternative A is selected and future demolition projects are proposed in the Loop Retail Historic District (beyond those that are reasonably foreseeable at this time), the potential cumulative impact may be greater. |
| 532 (CCAC 86) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.1.1 To suggest the demolition of the subject properties will only have a moderate cumulative impact on the Federal Center again underestimates the importance Mies Van Der Rohe places on the surrounding built and natural environment in the design of his buildings. His complex stands on its own, but it was never intended to. The GSA should do everything in its power to find a solution that keeps them intact and allows for their complete and viable reuse. The cumulative impact should be escalated to significant. | Section 3.1.2.1 assesses the direct impacts to architectural resources, including the Chicago Federal Center, from Alternative A (Demolition). Section 3.1.2.1 concluded that direct impacts to the Chicago Federal Center would be negative, moderate, and long-term. The cumulative impact analysis identified that no other past, present, or reasonably foreseeable future activities would affect the Chicago Federal Center. Therefore, GSA determined that the cumulative impacts to the Chicago Federal Center would be moderate. |
| 532 (CCAC 87) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.1.1. We are required by the rules of this discipline to define artificial boundaries around historic district nominations so we can go about the rest of the business of explaining what is there and how important it is. In the real world, however, we acknowledge that the history of each of these defined districts flows between one and the other like a glorious spectacle of culture and time. Suggesting that the loss of two significant buildings in this tapestry is nothing short of significant dismisses the very value of historic preservation to our cultural and economic growth and development. | National Register Historic Districts are concentrations of historic buildings, structures, sites, and/or objects united historically or aesthetically by plan or physical development, as designated by the federal government. Therefore, it is logical to analyze them separately in this document. Analyzing them separately does not distract from the larger picture. The loss of three historic buildings would not result in a substantial loss of integrity (significant impact) to Chicago's cultural tapestry. If Alternative A is selected and future demolition projects are proposed in the Loop (beyond those that are reasonably foreseeable at this time), the potential cumulative impact to National Register Historic Districts may be greater. |
| 532 (CCAC 88) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.1.1. Every negative impact for each separate category of historic properties in this section is grossly undervalued. Can we talk through this analysis in one of our future charrette meetings? | GSA is willing to discuss these impact ratings at future meetings. Draft EIS comments were discussed in National Environmental Policy Act (NEPA) meetings, while National Historic Preservation Act (NHPA) concerns were discussed at Section 106 Consulting Party meetings. Note that the impact ratings in this section are cumulative impacts. Direct impacts to historic resources are discussed in Section 3.1.2. |
| 532 (CCAC 89) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.1.2. In each place where it occurs, we are obligated to point it out. This section contains language to the effect that despite previous demolitions prior to 1998, there was still enough integrity to get a National Register designation. Therefore, it is minor to tear down one or three more. It is our express desire that this EIS reflect the more progressive approach we take as a movement in the year 2023. This is not best practice, and this language should be removed. | This section evaluates the cumulative impacts of the Viable Adaptive Reuse Alternative and the potential impacts of past, present, and reasonably foreseeable future activities, which are listed in Table 4-1. The evaluations are not intended to suggest that demolition is a minor impact, but that the cumulative impact of this action compared to all the past, present, and foreseeable future activities is minor. The Loop Retail Historic District will still be eligible for the NRHP if these buildings are demolished. |
| 532 (CCAC 90) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.1.2. How can the viable restoration and reuse of two significant skyscrapers only yield a negligible beneficial impact to surrounding historic properties? When we visit the dentist, is our goal to get upwards of 50% of our real teeth in our mouth or all of them? We should treat these historic properties like our own teeth. | This section evaluates the cumulative impacts of the Viable Adaptive Reuse Alternative and the potential impacts of past, present, and reasonably foreseeable future activities, which are listed in Table 4-1. Negligible in this context means little to no effects to historic properties, so that is a positive for the resources. Refer to Table 3.1-2, Impact and Effect Thresholds for NEPA and Section 106. |

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| 532 (CCAC 91) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.2.1. This document asserts that the cumulative aesthetic and visual impact of losing these historic skyscrapers and replacing them with wood-chips and hostas will have a negligible negative impact. Please provide substantiation to back up this claim. Perhaps we can do an illustrated survey of federally owned vacant lots and do an aesthetic and visual assessment with a sample audience of what is more substantial – a restored and reused skyscraper or a vacant lot on a corner lot zoned for high density? | The last sentence of Section 4.2.2.1 of the Final EIS has been revised to state “Based on the impact thresholds defined in Table 3.2-1 of Section 3.2, Aesthetic and Visual Resources, of this EIS, the Demolition Alternative would result in a long-term negative impact at the project site that would range from minor to moderate, but the character of the surrounding Loop Retail Historic District would be maintained resulting in an overall moderate cumulative impact regarding aesthetic and visual resources.” The commentor suggests a more expansive survey with a “sample audience of what is more substantial – a restored and reused skyscraper or a vacant lot on a corner lot zoned for high density” that is beyond the scope of this EIS. |
| 532 (CCAC 92) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.3.1. This section asserts that the demolition will yield a positive cumulative impact on community facilities because the entrance to the courthouse would be moved to the west side, creating presumably a much-needed public plaza space in the neighborhood. It does seem to ignore the quite large and public gathering plaza directly to the east of the federal courthouse. How many grand plazas does a small area need in an area zoned for high density? Furthermore, these historic buildings, along with the Chicago Federal Center, have been designed by the great masters of architecture, taking into account many of the features we have all collectively identified as significant. Why would any authority even begin to question the greatness of the existing buildings and potentially consider destroying a work of art and architecture. | Section 4.2.4.1 states that it reasonably foreseeable that a new entrance could be built, but it does not state that it will occur and a new entrance on the east side of the Dirksen Courthouse is not part of this proposed action. (Note that the commenter mixes up east and west). |
| 532 (CCAC 93) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.3.2. Our intention here is not to badger a point, but to highlight the points that need to be reiterated throughout this document. How can it be suggested reasonably that the adaptive reuse of the subject properties will not have a moderate or significant beneficial impact on the community facilities nearby? Adding people who live, work, and play in an area absolutely strengthens adjacent community facilities, and that if before we can even have a chance to assess what community facilities are missing in the area and could possibly be included in a set of redeveloped buildings? | This section has been modified to note that there will be a moderate, beneficial cumulative impact to community facilities. |
| 532 (CCAC 94) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.4.1. In a discussion of the cumulative socioeconomic impacts of demolition, the language here suggests that demolition of the subject properties may set the Chicago Loop Alliance back on its goals to bring State Street back to life. We encounter the “may” language here. We cannot say with 100% certainty that something will or will not happen in the future, but we can get a lot closer than “may” in our analysis. Why are we being so gentle with the demolition and dismissive of restoration alternatives? It defies reason, and it does not belong in this document. | GSA objectively analyzed Alternative A, Demolition and Alternative B, Viable Adaptive Reuse to the same degree based on the best, most recent data available. This section has been modified to change instances of “may” to “would.” |
| 532 (CCAC 95) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.4.1. This section asserts that because we cannot measure which tourists are coming to Downtown Chicago specifically to see the subject properties in their dilapidated state of vacancy, the cumulative impact of lost heritage tourism will be greater than mild. And if the loss of the subject properties does not create a tipping point, which demolition will? Is this what we plan in the 21st Century for great and strong American cities? | Section 3.5.1.4 discusses the importance of heritage tourism generally and in Chicago. GSA acknowledges the potential negative cumulative impact of Alternative A, Demolition on heritage tourism. GSA has categorized the negative cumulative impact as minor based on the direct impacts of Alternative A in combination with past, present, and reasonably foreseeable future activities of similar nature. There is limited direct tourism associated with these buildings based on the architectural tours offered in the Loop, which is the best measure available to help qualitatively determine the impact to heritage tourism from demolishing these buildings. We cannot assume that if the buildings were in good repair that they would be attracting more visitors. In addition, if the buildings are demolished, there would be a large number of remaining National Register-listed buildings, contributing buildings, and NHLs in the Loop Retail Historic District. If Alternative A is selected and future demolition projects are proposed within the affected environment analyzed in the Final EIS during the NEPA process for this undertaking (beyond those that are reasonably foreseeable at this time), the potential cumulative impacts of those projects to heritage tourism would be analyzed. |

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| 532 (CCAC 96) | Ward A. Miller and Holly Fiedler | Non-federal agency stakeholder | CCAC | 4.2.4.2. We are being asked again to suspend reality when we read here that the restoration of the subject properties will have no cumulative impact on heritage tourism. Please change this language. | The cumulative impacts analysis considers the incremental impacts of the Action Alternatives in conjunction with the impacts of past, present, and reasonably foreseeable future activities. As stated in Section 4.2.5.2, the Viable Adaptive Reuse Alternative is not anticipated to remove key character-defining features. Although the buildings retain some historic integrity, the exteriors are in need of significant repairs and investment. Section 3.5.2.2 states that the Viable Adaptive Reuse Alternative could have a beneficial, minor long-term direct impact on heritage tourism. Considering Alternative B's direct impact with past, present, and reasonably foreseeable future activities (notably past demolitions of architecturally significant buildings that may have had a small direct loss to regional heritage tourism), there would overall be no cumulative impact from Alternative B. |