U.S. General Services Administration

Final Environmental Impact Statement

The Buildings at 202, 214, and 220 South State Street, Chicago, Illinois

July 2024

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Final Environmental Impact Statement

U.S. General Services Administration

Cooperating Agency: Federal Protective Service

The Buildings at 202, 214, and 220 South State Street
Chicago, Illinois

Abstract

U.S. General Services Administration is assessing the future of three vacant federally owned buildings located at 202, 214, and 220 South State Street in Chicago, Illinois. This Final Environmental Impact Statement examines the potential environmental impacts of two Action Alternatives as well as those of the No Action Alternative. The resources analyzed are cultural resources, aesthetic and visual resources, land use and zoning, community facilities, socioeconomics, environmental justice, greenhouse gas emissions, hazardous material and waste, air quality, noise, human health and safety, and transportation and traffic.

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July 2024

GSA

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Executive Summary

This Final Environmental Impact Statement (EIS) has been prepared by the United States (U.S.) General Services Administration (GSA) in accordance with the National Environmental Policy Act of 1969 (NEPA) as amended; the President's Council on Environmental Quality regulations implementing NEPA (*Code of Federal Regulations* Title 40, Parts 1500–1508); GSA Order ADM 1095.1F, *Environmental Considerations in Decision Making* (GSA 1999a); and GSA's *PBS NEPA Desk Guide* (GSA 1999b).

ES.1 Proposed Action

The Proposed Action evaluated in this Final EIS is to address the future of the three vacant buildings at 202, 214, and 220 South State Street, east of the Everett McKinley Dirksen U.S. Courthouse (Dirksen Courthouse; 219 South Dearborn Street), in Chicago, Illinois.

ES.2 Purpose and Need

The purpose of the Proposed Action is to address the security needs of the Dirksen Courthouse, considering the U.S. Congress's 2022 authorization of funds and authority to GSA to demolish the buildings at 202-220 South State Street. The Proposed Action is specifically needed for the following reasons:

- Address Security: GSA must address the security needs of the Dirksen Courthouse, a federal facility.
- Respond to Congressional Intent in the 2022 Consolidated Appropriations Act: While there are statutory requirements to consider congressional intent, GSA, as a federal agency subject to NEPA, must also evaluate reasonable alternatives that would meet the purpose and need of the Proposed Action.
- Manage Federal Assets: 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.

ES.3 Project Site

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

ES.4 Alternatives

ES.4.1 Alternative A, Demolition

Alternative A would involve the demolition of the three vacant buildings at 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.

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. The Demolition Alternative would meet the purpose and need of the Proposed Action.

ES.4.2 Alternative B, Viable Adaptive Reuse

Alternative B would involve first collaborating with one or more developers who would use the three buildings at 202, 214, and 220 South State Street in accordance with viable adaptive reuse security criteria listed as follows and in Section 2.1.2 of the Final EIS. The draft Section 106 Programmatic Agreement documents mitigation measures to reduce significant adverse impacts to cultural resources. These measures were discussed and agreed to during the Section 106 consultation process. The Draft Programmatic Agreement is available in Appendix B of this EIS. 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 meet the purpose and need of the Proposed Action upon satisfying the security needs of the Dirksen Courthouse.

The following list specifies the viable adaptive reuse security criteria developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies. References to "developer" include lessees, tenants, or other occupants and users of the buildings:

1. The Federal government must retain ownership interests to achieve its security objectives, as determined by the government in its discretion.

2. Occupancy/Use: Properties shall not be used for short-term or long-term residential or lodging, places of worship, or medical treatment, services, or research. No use that requires access to outdoor areas is permitted.

3. Access to the roof is restricted to maintenance and repair activities. Personnel and materials that will be present in this area shall be subject to clearance and controls necessary to meet court security objectives.

4. Developer would have no access or use rights to Quincy Court.

5. Loading is prohibited in Quincy Court and otherwise restricted in a manner to achieve court security. Loading on State or Adams Streets would be subject to local ordinance requirements.

6. Occupants and users of the buildings shall have no sight lines into the Dirksen Courthouse, the Dirksen Courthouse ramp, or the Quincy Court properties owned by GSA.

7. No parking or vehicle access is permitted on or within the properties.

8. Developer is responsible for staffing, at their expense, security 24 hours a day with personnel approved by the Federal Protective Service or an entity to whom security services are delegated by Federal Protective Service.

9. Developer must obtain and maintain access control systems to prevent unauthorized access to any location within the structures. Each exterior entrance point must have an intrusion detection system and access control system installed, and Developer must provide federal law enforcement access to each system.
10. Developer must install and maintain interior and exterior security cameras and provide federal law enforcement officials with access and the ability to monitor the feeds in real time.
11. Developer must install exterior lighting necessary to achieve courthouse security objectives.
12. Perimeter Security: Developer must prevent unauthorized access to the properties that would result in an unapproved sight line.
13. Fire escapes, and any other structures that would allow access from the street, must be removed.
14. All construction documents and specifications for any renovation, rehabilitation, modification, or construction of any portion of the building (interior or exterior) will be subject to review and approval by federal law enforcement agencies.
15. No project may start without the advance approval of GSA.

ES.4.3 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. Since acquiring the properties, GSA spends approximately $70,000 annually on scaffolding rentals and approximately $750,000 every other year for façade inspections and repairs, which does not include emergency repairs or security. GSA would continue to have limited federal funds available to continue with the maintenance. The No Action Alternative does not meet the purpose of the Proposed Action, which is to address security needs of the Dirksen Courthouse. This alternative is used as a baseline to evaluate the impacts of the Action Alternatives.

ES.4.4 Preferred Alternative

GSA's Preferred Alternative is Viable Adaptive Reuse (Alternative B). Under this Preferred Alternative, GSA will pursue viable adaptive reuse pursuant to the National Historic Preservation Act (NHPA) Section 111 outlease authority. GSA will issue a Request for Lease Proposals to seek a reuse that meets the security needs of the Dirksen Courthouse.

ES.5 Environmental Consequences

Table ES-1 summarizes the potential effects of the Proposed Action on the existing natural and built environment resources if Alternative A, Demolition, Alternative B, Viable Adaptive Reuse, or the No Action Alternative were chosen as the Preferred Alternative.

Table ES-1. Potential Environmental Effects of the Proposed Alternatives

Resource Area	Alternative A, Demolition	Alternative B, Viable Adaptive Reuse	No Action Alternative
Cultural Resources	The three buildings at 202, 214, and 220 South State Street would be demolished. Impacts to these buildings would be negative, significant, and long term. Removing the Century and Consumers Buildings and 214 South State Street would alter character-defining features of the Loop Retail Historic District and Chicago Federal Center, resulting in negative, moderate, and long-term impacts. Other historic properties would experience negative, minor-to-moderate, long-term impacts.	The buildings at 202, 214, and 220 South State Street would be adaptively reused. Impacts would be beneficial, negligible-to-moderate, and long term. Long-term beneficial impacts include the potential to enhance the Loop Retail Historic District by rehabilitating the exteriors of these buildings and returning them to commerce.	The buildings at 202, 214, and 220 South State Street would remain in their current condition, in need of significant repairs, and could continue to deteriorate. GSA would continue to maintain the properties at the current level, and the properties would remain vacant. Maintaining the current condition of the properties would not improve the buildings but could involve alterations (such as stabilization of terra-cotta pieces or removal of deteriorating elements). GSA would continue to have limited federal funds available for maintenance and security of the buildings. There would be negative, moderate, long-term impacts.
Aesthetic and Visual Resources	Removing the buildings would change the visual character of South State Street and Adams Street. Impacts to aesthetic and visual resources at the project site would result in a long-term negative impact that would range from minor or moderate. The character of the surrounding Loop Retail Historic District would be maintained, resulting in an overall moderate impact.	Under this alternative, a beneficial long-term impact to aesthetic and visual resources would result.	The scale, form, materials, and character of the project site and visual context of the surrounding area would remain unchanged. Thus, no long-term impact would occur.

Resource Area	Alternative A, Demolition	Alternative B, Viable Adaptive Reuse	No Action Alternative
Land Use and Zoning	Removing the buildings is not consistent with land use plans in the area. Under this alternative, there would be negative, significant, long-term impacts to land use.	Reuse of the buildings is compatible with local land use plans. Under this alternative, there would be beneficial, significant, long-term impacts to land use.	Land use would not change under the No Action Alternative. Thus, there would be no impact.
Community Facilities	No community facilities would be directly impacted. There could be temporary disruptions to public transportation systems and temporary noise impacts to community facilities. There would be negative, minor or moderate, short-term impacts to nearby community facilities.	No community facilities would be directly impacted. Temporary disruptions to public transportation systems and temporary noise impacts would be less than Alternative A. There could be beneficial impacts to community facilities, depending on the type of development. There would be negative, negligible, short-term impacts to nearby community facilities, and beneficial, minor, long-term impacts.	No community facilities would be impacted under the No Action Alternative.
Socioeconomics and Environmental Justice	Impacts to the economy and employment would primarily be beneficial, minor, and short term. There would be negative, minor, long-term impacts to heritage tourism and no impacts to environmental justice.	Impacts to the economy and employment would be primarily beneficial, minor, and short term. Long-term impacts would include a beneficial, minor-to-moderate impact from the added economic benefit from new workers and tax revenue. There would be a beneficial, minor, long-term impact to heritage tourism. There would be no impacts to environmental justice.	There would be no impacts to socioeconomics, heritage tourism, or environmental justice.

Resource Area	Alternative A, Demolition	Alternative B, Viable Adaptive Reuse	No Action Alternative
Greenhouse Gas Emissions	Greenhouse gas emissions would occur from removing the buildings. No long-term greenhouse gas emissions would occur after demolition. The impact from greenhouse gas emissions would be significant and short term. There would be a negative, negligible, short-term impact to climate risk and embodied carbon.	Greenhouse gas emissions would occur from the viable adaptive reuse of the buildings. The impact from greenhouse gas emissions would be negative and significant in the short term, and negative and minor in the long term. There would be a negative, negligible, long-term impact to climate risk and embodied carbon	Because the buildings are currently vacant, there would be no new impacts. Impacts on greenhouse gas emissions and climate change would be negative, negligible, and long-term. There would be a negligible impact from embodied carbon.
Hazardous Materials and Solid Waste	Impacts would be beneficial, minor, and long term as a result of removing existing hazardous materials from the project site. Demolition debris would result in negative, minor-to-moderate, long-term impacts to landfills.	Impacts would be beneficial, minor, and long term as a result of removing existing hazardous materials from the project site during renovation. Construction debris from renovations would result in negative, negligible, long-term impacts to landfills.	No additional impacts related to hazardous materials or wastes would likely occur beyond those occurring under current conditions.
Air Quality	Demolition would not cause or contribute to a violation of any National Ambient Air Quality Standards. Impacts would be negative, minor and short term for local air quality, and negative, negligible, and short term for regional air quality.	Viable Adaptive Reuse would not cause or contribute to a violation of any National Ambient Air Quality Standards. Impacts would be negative, minor, and short term for local air quality, and negative, negligible, and short term for regional air quality.	The No Action Alternative would not change current conditions. Therefore, no impacts to air quality would occur.

Resource Area	Alternative A, Demolition	Alternative B, Viable Adaptive Reuse	No Action Alternative
Noise	Demolition would increase noise for the surrounding community and would result in negative, moderate, short-term impacts. After demolition, there would be no impacts.	Viable Adaptive Reuse would increase noise for the surrounding community and would result in negative, moderate, short-term impacts.	There would be no impact from noise under the No Action Alternative.
Health and Safety (Including Protection of Children)	Impacts to public safety and the protection of children would be negative, minor, and short-term during construction.	Impacts to public safety would be negative, minor, and short term during renovation. There would be no impact on the protection of children.	There would be negative, moderate, long-term impacts to health and safety and protection of children related to the presence of deteriorating vacant buildings in an urban environment.
Transportation and Traffic	Impacts from lane closures and increased construction traffic would result in negative, minor, short-term impacts.	Impacts from lane closures and increased construction traffic would result in negative, minor, short-term impacts.	The No Action Alternative would have no impact to transportation and traffic.

ES.6 Mitigation Measures

Table ES-2 summarizes the mitigation measures that GSA would implement for each resource to avoid or minimize potential impacts to that resource.

Table ES-2. Mitigation Measures by Resource

Resource Area	Summary of Mitigation Measures
Cultural Resources	Mitigation measures will be stipulated in a legally binding Section 106 Programmatic Agreement and included in Appendix B of this Final EIS. An unanticipated discovery plan would be developed to address any archaeological resources that might be discovered during ground-disturbing activities.
Aesthetic and Visual Resources	Under the Demolition Alternative, the new flat ground-level plaza would be an open space with landscaping in compliance with GSA and U.S. Court design guidelines.

Resource Area	Summary of Mitigation Measures
Land Use and Zoning	Under the Demolition Alternative, GSA would coordinate with the Section 106 Consulting Parties to landscape the vacant site. Stormwater management practices would be adhered to.
Community Facilities	No mitigation measures are required.
Socioeconomics & Environmental Justice	No mitigation measures are required.
Greenhouse Gas Emissions	No mitigation measures are required. Nonetheless GSA will consider several measures to reduce greenhouse gas emissions.
Hazardous Materials and Solid Waste	Mitigation measures may include surveying buildings prior to renovations or demolition; preparing a Materials Management Plan; abatement of polychlorinated biphenyl (PCB)-containing materials or asbestos-containing materials (if identified); following a Spill Prevention and Response Plan (if required); characterizing, segregating, and managing potentially hazardous wastes onsite prior to offsite disposal; and implementing measures to divert as much debris as possible from landfills for reuse.
Air Quality	Incorporation of best management practices and control measures to control emissions from demolition and construction activities such as using water and tarps to cover dust sources; implementing an anti-idling policy for vehicles and equipment; staging vehicles away from the site and minimizing number of vehicles accessing the site; and conducting real-time air monitoring of particulate matter less than or equal to 10 micrometers (PM_{10}) and volatile organic compound emissions and adjusting work activities if action limits are exceeded.
Noise	Mitigation measures may include undertaking demolition or renovation between the hours of 8 a.m. and 8 p.m. and the use of noise and vibration monitoring methods.
Health and Safety (Including Protection of Children)	Mitigation may include securing construction site access points, removing contents that could attract opportunistic thieves, continuing maintenance and routine inspections, and requiring personal protective equipment during demolition and construction.
Transportation and Traffic	Potential mitigation measures include limiting lane closures on Adams Street and South State Street to less than the full block to shorten traffic backups, and temporarily shifting the two southbound through-lanes to the east if the two southbound lanes need to be maintained on the full block of South State Street.

ES.7 Cumulative Impacts

Cumulative impacts are those impacts that would result from the incremental effects of the Proposed Action when considered with those of past, present, and reasonably foreseeable future actions in the same region of influence.

Alternative A, Demolition, would result in a negative moderate cumulative impact to historic buildings in the Loop Retail Historic District and Chicago Federal Center, which are listed in the National Register of Historic Places. Demolition would also result in negative, minor-to-moderate cumulative impacts to the aesthetic and visual resources. Demolition would have a potential minor-to-moderate beneficial cumulative impact to community facilities.

Alternative B, Viable Adaptive Reuse, would result in beneficial, moderate cumulative impacts to the economy of the area as a result of new employment opportunities and an enlarged customer base if the buildings were to be adapted for office use and would further maintain the historic integrity of the Loop Retail Historic District.

The No Action Alternative would not contribute any incremental impacts to those of past, present, and reasonably foreseeable future actions in the region of influence.

ES.8 Public Engagement

NEPA public participation opportunities are guided by GSA's NEPA-implementing procedures, the requirements of NEPA (*Code of Federal Regulations* Title 40, Part 1506.6), and the Council on Environmental Quality's regulations. A NEPA public scoping period occurred from October 28, 2022, through December 12, 2022. Table ES-3 summarizes the concerns raised during the scoping period. GSA considered all comments received during the scoping process for the Draft EIS.

Table ES-3. Summary of Scoping Period Comments

Comment Topic	Summary of Comments
Environmental issues	Demolition would waste embodied carbon and existing resources, and long-term environmental impacts would include an increased reliance on cars due to loss of urban density. Sections 3 and 4 of this Final EIS discuss environmental impacts.
Cultural resources	Impacts to cultural resources including the Loop Retail Historic District from demolition. Section 3.1.2 of this Final EIS discusses cultural resource impacts.
Security concerns	Questions regarding the reasons that the buildings at 202, 214, and 220 South State Street pose more of a risk to the Dirksen Courthouse than other buildings in the area, as well as why security measures such as internal measures, removing sightlines facing federal buildings, and removing windows are not being considered over demolition. There were also concerns about the safety of the area if the buildings were demolished. Section 1.3.1 of this Final EIS discusses security needs. Section 3.10.2 discusses health and safety impacts.
Economic loss from demolition	Potential loss of tax revenue, tourism value, and investments in the South State Street corridor from demolition, in addition to use of taxpayer funds. Section 3.5.2 of this Final EIS discusses economic impacts.

Comment Topic	Summary of Comments
Alternatives	The number of alternatives being analyzed and the security criteria for viable adaptive reuse limiting potential preservation and viable adaptive reuse options. Comments suggested analyzing additional Alternatives such as renovating buildings for affordable housing or using as an archive center. Section 2 of this Final EIS describes the alternatives analysis.
Demolition by neglect	The buildings at 202, 214, and 220 South State Street would be allowed to remain vacant and fall into disrepair.

A NEPA Draft EIS public comment period occurred from September 15, 2023 to October 31, 2023. GSA hosted a public hearing on October 2, 2023. GSA received 531 comments, almost all of which opposed demolishing the buildings. Table ES-4 summarizes the comments submitted during the Draft EIS comment period. GSA's responses to the comments on the Draft EIS are in Appendix H.

Table ES-4. Summary of Draft EIS Comment Period Comments

Comment Topic	Summary of Comments
Support for the Viable Adaptive Reuse Alternative	Viable adaptive reuse would preserve the historically important buildings and prevent environmental impacts associated with demolition. Comments were generally in favor of viable adaptive reuse to restore and reuse the buildings rather than demolishing them. Sections 3 and 4 of this Final EIS discuss environmental impacts from viable adaptive reuse and demolition.
Opposition to Demolition Alternative	Comments expressed concern about the impacts of losing the historically important buildings such as creating a "gap" in South State Street and impacting Chicago's architectural history. There was also concern that demolition would result in negative environmental impacts from embodied carbon emissions, air quality, and waste production. Sections 3 and 4 of this Final EIS discuss environmental impacts from demolition.
Dirksen Courthouse	The Draft EIS needed more information on why other options to improve security to the Dirksen Courthouse (such as retrofitting the Courthouse, reducing the security risk of other nearby buildings, and moving the Courthouse functions) were not evaluated as alternatives. Section 2 of this Final EIS describes the alternatives analysis.
Viable adaptive reuse security criteria	The viable adaptive reuse security criteria were considered too restrictive. Section 2.1.2 of this Final EIS identifies the security criteria.
Landmark designation	Comments noted the proposed Commission on Chicago Landmarks preliminary landmark recommendation for 202 and 220 South State Street. Section 3.1.1.3 of this Final EIS discusses the proposed preliminary landmark recommendation for 202 and 220 South State Street.

ES.9 Agency Coordination

ES.9.1 During Scoping Period

The following scoping comments were received from federal agencies. GSA considered all comments received during the scoping process during the preparation of the Draft EIS.

- **U.S. Environmental Protection Agency (EPA):** In a letter to GSA dated December 12, 2022, EPA provided recommendations on the preparation of the EIS, such as the project description, purpose, need, and range of alternatives. EPA also provided recommendations on assessing environmental resources including hazardous materials released during demolition; air quality; children's health and safety; historic preservation and tribal resources; noise and vibrations; environmental justice and community impacts; and climate change, specifically evaluating and assessing the impacts of greenhouse gas emissions and the social cost of carbon.
- **U.S. Fish and Wildlife Service:** In an email to GSA dated November 3, 2022, the U.S. Fish and Wildlife Service stated it had no substantive comments on the Proposed Action.
- **U.S. Geological Survey:** In an email to GSA dated November 3, 2022, the U.S. Geological Survey stated it had no comments on the Proposed Action.

Scoping comments were received from the following non-federal agency stakeholders:

- American Institute of Architects Illinois
- American Institute of Architects Chicago
- Chicago Collaborative Archive Center
- Landmarks Illinois
- National Trust for Historic Preservation
- Preservation Chicago
- City of Chicago Department of Planning and Development

ES.9.2 During Draft EIS Comment Period

Comments on the Draft EIS were received from EPA, the U.S. Department of the Interior, and the Chicago Transit Authority (CTA).

EPA's comments related to the alternatives GSA is considering, the NHPA, energy efficiency and environmental best practices during construction or demolition, and greenhouse gas emissions.

The U.S. Department of the Interior's letter stated that it reviewed the Draft EIS and had no comment.

CTA's comments asked GSA to coordinate with CTA in advance if demolition or adaptive reuse would affect access to CTA's Red Line on State Street.

In addition, the National Park Service emailed a correction related to the Chicago skyline submittal to the United Nations Educational, Scientific and Cultural Organization after the comment period ended (Section 3.5.1.4). GSA received the email after the comment period ended, but this Final EIS reflects the National Park Service's input.

ES.10 National Historic Preservation Act

Per Section 106 of the NHPA, GSA considers the effects of the Action Alternatives on historic properties and provides opportunities for public input. GSA identified Consulting Parties and has been consulting with the Illinois State Historic Preservation Office, Advisory Council on Historic Preservation, other agencies responsible for historic preservation, local citizens, and groups with an interest in historic preservation (consulting parties). GSA invited the public and anyone interested in being considered a Consulting Party to the public scoping meeting on November 10, 2022, during which the role of a Consulting Party was discussed in detail. GSA initiated the Section 106 consultation process for the Proposed Action in October 2022. GSA has held 12 meetings with Consulting Parties to date. In addition, several Consulting Parties participated in charrettes sponsored by GSA to generate ideas for viable adaptive reuse. GSA developed and circulated a draft Programmatic Agreement to the Illinois State Historic Preservation Office (SHPO) and Advisory Council on Historic Preservation (ACHP) in January 2024 and the Consulting Parties in February 2024. The Programmatic Agreement will be signed by GSA, SHPO and ACHP prior to the Record of Decision.

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Acronyms and Abbreviations

Acronym	Definition
°F	degree(s) Fahrenheit
µg/m^3	microgram(s) per cubic meter
AASHTO	American Association of State Highway and Transportation Officials
ACHP	Advisory Council on Historic Preservation
ACM	asbestos-containing material
APE	Area of Potential Effects
ATF	Bureau of Alcohol, Tobacco, Firearms, and Explosives
BMP	best management practice
CARE	Carbon Avoided: Retrofit Estimator
CEQ	Council on Environmental Quality
CFR	*Code of Federal Regulations*
CHRS	Chicago Historic Resources Survey
CMAP	Chicago Metropolitan Agency for Planning
CTA	Chicago Transit Authority
dB	decibel(s)
dBA	A-weighted decibel(s)
Dirksen Courthouse	Everett McKinley Dirksen U.S. Courthouse
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
FBI	Federal Bureau of Investigation
FEMA	Federal Emergency Management Administration
FHWA	Federal Highway Administration
FPS	Federal Protective Service
FTE	full-time equivalent
GHG	greenhouse gas
GSA	U.S. General Services Administration
HVAC	heating, ventilation, and air conditioning
Illinois OSHA	Illinois Department of Labor, Division of Occupational Safety and Health

Acronym	Definition
IMPLAN	Impact Analysis for Planning
IPCC	Intergovernmental Panel on Climate Change
ISC	Interagency Security Committee
NAAQS	National Ambient Air Quality Standards
National Register	National Register of Historic Places
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NPS	National Park Service
OMB	Office of Management and Budget
PCB	polychlorinated biphenyl
PM_{10}	particulate matter less than or equal to 10 micrometers
$PM_{2.5}$	particulate matter less than or equal to 2.5 micrometers
ppb	part(s) per billion, by volume
ppm	part(s) per million, by volume
RCRA	Resource Conservation and Recovery Act
RLP	Request for Lease Proposals
ROD	Record of Decision
SHPO	State Historic Preservation Office
UNESCO	United Nations Educational, Scientific and Cultural Organization
U.S.	United States
U.S.C.	*United States Code*
USMS	U.S. Marshals Service
WRI	World Resources Institute

1. Purpose and Need

1.1 Introduction

The United States (U.S.) General Services Administration (GSA), Great Lakes Region 5, prepared this Environmental Impact Statement (EIS) to assess the environmental impact of alternatives for the future of its three vacant buildings east of the Everett McKinley Dirksen U.S. Courthouse (Dirksen Courthouse; 219 South Dearborn Street) 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). GSA owns the three buildings, which were acquired by GSA to create a buffer zone integral to the security of Dirksen Courthouse, and there is currently no federal occupancy need for them. 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.). In March 2022, the U.S. Congress passed the 2022 Consolidated Appropriations Act (Public Law No. 117-103), which provided funding to GSA for "the demolition of the buildings located at 202, 208-212, 214, and 220 South State Street, Chicago, Illinois."

In March 2023, an architect-engineer team found two areas of partial collapse and areas of near collapse in 208-212 South State Street, which could have resulted in structural failure. The building at 208-212 South State Street was demolished from April to June 2023. The demolition of 208-212 South State Street was coordinated as an emergency action with the President's Council on Environmental Quality (CEQ). GSA proceeded with an emergency action to demolish 208-212 South State Street in accordance with the National Environmental Policy Act of 1969 (NEPA) and the National Historic Preservation Act of 1966 (NHPA), and with concurrence from the Illinois State Historic Preservation Office (SHPO). No potential significant impacts to the environment or cultural resources were identified through those efforts.

GSA is the lead federal agency and has prepared this EIS to comply with NEPA, as amended; the CEQ's regulations implementing NEPA (*Code of Federal Regulations* [CFR] Title 40, Parts 1500 through 1508); GSA Order ADM 1095.1F, *Environmental Considerations in Decision Making* (GSA 1999a); and GSA's *PBS NEPA Desk Guide* (GSA 1999b).

The Federal Protective Service (FPS) is a cooperating agency for this EIS. FPS is a federal agency that uses security expertise and law enforcement authority to protect federal government facilities owned or leased by GSA (U.S. Department of Homeland Security 2023).

1.2 Background

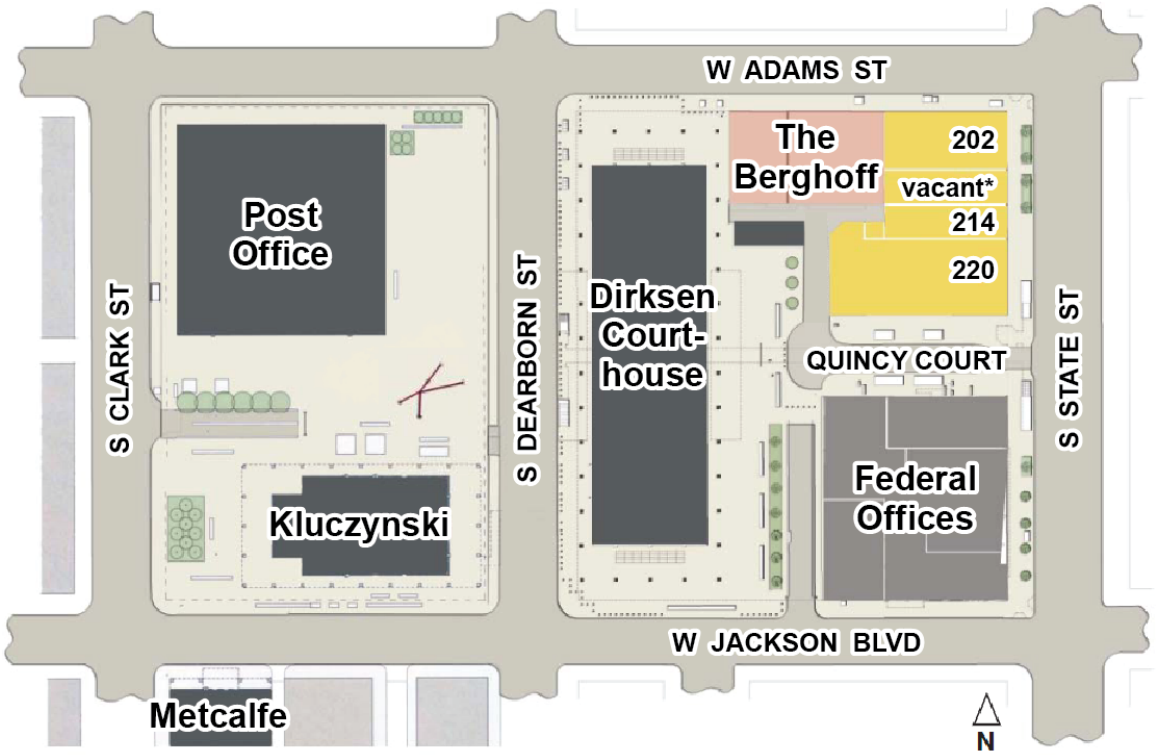
GSA is an independent federal executive agency and works with other federal agencies to fulfill their real estate needs. In support of its mission, GSA manages a real estate portfolio of more than 8,800 owned and leased assets and more than 370 million square feet of workspace for 1.1 million federal employees. GSA also preserves more than 500 historic properties, which is approximately one-third of GSA's nationwide real estate assets (GSA n.d.a). In Illinois, GSA has a federal portfolio of 8 courthouses and 14 office buildings, and a leased portfolio of more than 250 locations.

GSA receives program requirements from federal agencies to effectively fulfill their mission requirements. GSA plans and executes real estate actions to best fulfill those mission and program needs. As such, this GSA action incorporates the security objectives and considerations of the U.S. Judiciary and federal law enforcement regarding the concerns of 202, 214, and 220 South State Street.

1.2.1 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 Dirksen Courthouse and The Berghoff restaurant on the west, and Quincy Court on the south (Figure 1-1). The federal government owns the entire block, except for two privately owned parcels containing The Berghoff restaurant.

Figure 1-1. Project Site



*Former 208-212 South State Street was demolished in Spring 2023.

1.2.2 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 to use Quincy Court for its operational needs. The intent of the 1.3-acre property acquisition was to increase the security perimeter of the Dirksen Courthouse. 202-220 South State Street is referred to as "proximate parcels" in GSA's 2004 prospectus on the property acquisition. 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." GSA completed the property acquisition in 2007.

Between 2007 and 2015, GSA analyzed and completed various federal redevelopment scenario studies for 202-220 South State Street, which included completing adaptive reuse feasibility studies. These plans are summarized in this section. Figure 1-2 illustrates the recent site history (refer to Section 1.2.2.6).

1.2.2.1 Chicago Federal Campus Expansion Plan: Utilization of North Half of Site, 2007

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

1.2.2.2 Chicago Federal Campus Expansion Plan: New Construction North Site Feasibility Study, June 2, 2008

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

1.2.2.3 Chicago Federal Campus Expansion Plan: Adaptive Reuse North Site Feasibility Study, June 2, 2008

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

1.2.2.4 Chicago Federal Campus Expansion Plan: Historical Preservation and Increased Marketability North Site Feasibility Study, February 20, 2009

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

1.2.2.5 Chicago Federal Campus Expansion Plan: Assessing Risks North Site Feasibility Study, March 6, 2013

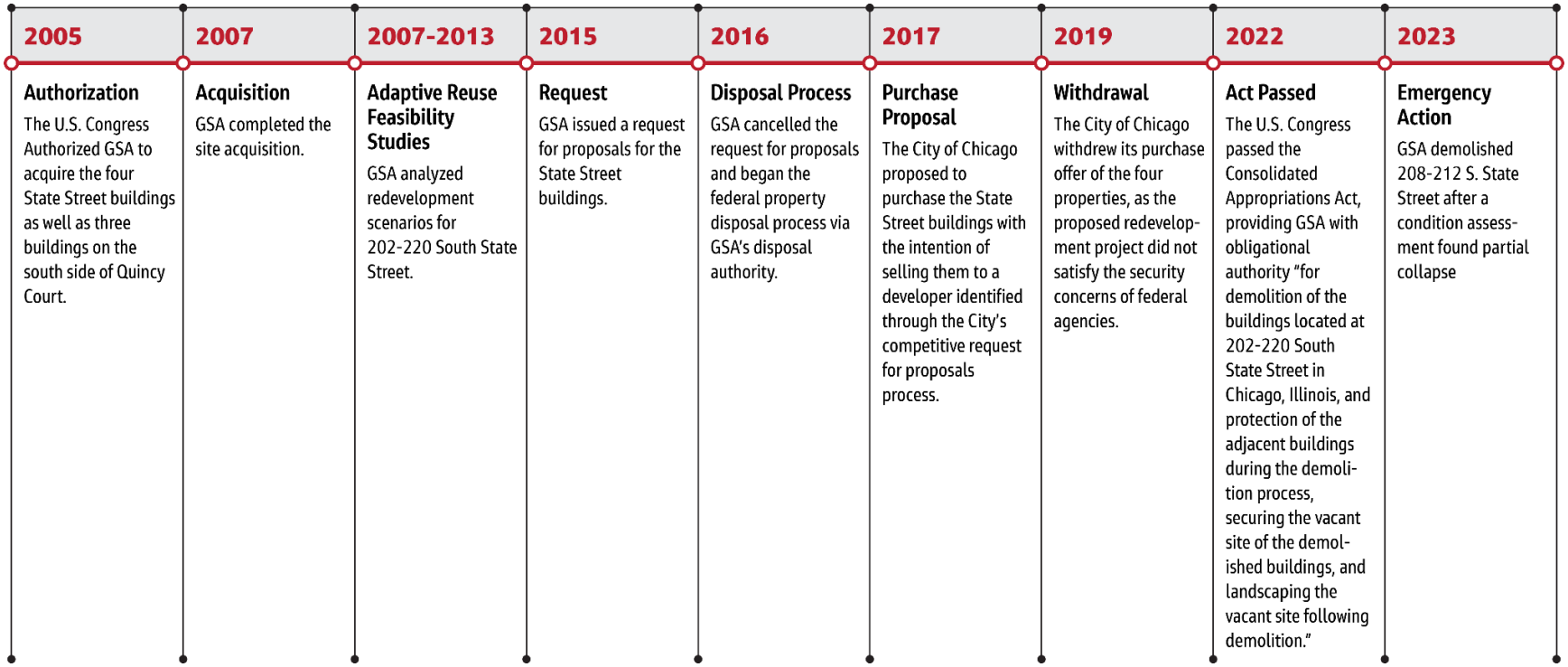
This 2013 study shifted from the earlier perspective of historic preservation and increased marketability to examining construction risks involved in developing the project site. Based on the findings of this study, GSA proposed using the existing buildings' footprint and the adjacent area between the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

1.2.2.6 Chicago Federal Campus Expansion Plan: Historical Preservation Study North Site Feasibility Study, March 6, 2013

This 2013 study supplemented the Assessing Risks study and focused on the historic preservation objectives from the 2008 Adaptive Reuse and 2009 Historic Preservation and Increased Marketability studies. Historic preservation workshops were held in June and September 2010 to engage Chicago's historic preservation community in examining viable design alternatives for the site. The Advisory Council on Historic Preservation (ACHP), Illinois SHPO, City of Chicago Landmarks Division, National Trust for Historic Preservation, and Landmarks Illinois participated in the workshops.

From the workshops, GSA learned that the historic preservation community preferred renovating 220 South State Street as an option, although it may not align with building standards for GSA buildings, local and national codes, Design Excellence, Art in Architecture, Leadership in Energy and Environmental Design certification, or the Secretary of the Interior's Standards for the Treatment of Historic Properties. Therefore, GSA's perspective shifted toward assessing construction risk in the 2013 Assessing Risks study. The workshops also led to reconsideration of the preferred alternative from the 2009 Historic Preservation and Increased Marketability study (keeping 202 South State Street). This study did not identify a preferred alternative.

Figure 1-2. Recent Site History



1.2.2.7 Site Proposals

As part of the disposal process, GSA first determined the space in the buildings was excess to its needs. Then, GSA offered the buildings to other federal agencies that might have a need for the space. After no further need was identified within the federal government, GSA determined that the buildings were surplus. This determination allowed the buildings to be made available for other public uses.

In 2015, GSA issued a request for proposals with the goal of exchanging the 202-220 South State Street properties for construction services at other locations. Although two proposals were submitted, only one proposal met the minimum requirements of the request, and it was ultimately withdrawn. The developer stated that this was "…due to site inefficiencies and a sizable façade restoration budget, coupled with a softer market and less liquid debt market…." (Office of Inspector General 2017). As a result, in 2016, GSA cancelled the request and began the federal disposal process via GSA's disposal authority (Section 412 of GSA General Provisions, Consolidated Appropriations Act, 2005).

In 2017, the City of Chicago proposed purchasing 202-220 South State Street with the intention of selling them to a developer identified through the City's competitive request for proposals process. The developer proposed a $141 million project to redevelop 202-220 South State Street into a mixed-used development with 429 apartments and retail space. However, in 2019, the City of Chicago withdrew its purchase offer of the four properties, as the proposed redevelopment project did not satisfy the security concerns of federal agencies (Lightfoot, pers. comm. 2019).

In 2022, the U.S. Congress passed the Consolidated Appropriations Act, which provided GSA with 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" (Public Law No: 117-103, March 15, 2022).

1.2.2.8 208-212 South State Street Demolition

In January 2023, GSA procured an architect-engineer team to perform a conditions assessment of all four buildings. During the assessment in March 2023, "two areas of partial collapse" and "areas of incipient collapse" were observed in 208-212 South State Street, creating the potential for imminent structural failure (Thornton Tomasetti 2023). The architect-engineer team concluded that the dangerous structural condition of the building posed an immediate threat to human health and safety and recommended demolition.

In accordance with 40 CFR Section 1506.12, GSA notified the CEQ and was advised to perform an abbreviated Environmental Assessment in compliance with NEPA to assess the potential environmental impacts of demolishing 208-212 South State Street. No significant effects were identified, which was documented in a Finding of No Significant Impact.

GSA coordinated with SHPO and ACHP because 208-212 South State Street is within the Loop Retail Historic District. SHPO concurred that 208-212 South State Street was not historic and that GSA should treat the undertaking to demolish the building as an emergency and follow the procedures established in 36 CFR 800.12. With GSA's assurance that it would protect all adjacent properties, SHPO concurred with the finding that the emergency action would not adversely affect historic properties.

The 208-212 South State Street building was demolished from April to June 2023 and is no longer considered a part of the Proposed Action for this EIS.

1.3 Purpose and Need of the Proposed Action

The purpose of the Proposed Action is to address the potential security vulnerabilities associated with 202, 214, and 220 South State Street, to respond to the passing of the 2022 Consolidated Appropriations Act, which calls for the demolition of these buildings, and to effectively manage federal property. The Proposed Action is specifically needed for the following reasons:

- Address Security
  - The Dirksen Courthouse building and its occupants are at particular risk of harm by hostile acts.
  - Physical security surrounding the Dirksen Courthouse needs to be maintained and enhanced.
- Respond to Congressional Intent
  - U.S. Congress passed the 2022 Consolidated Appropriations Act with the following funding authorizations:
    - Defined scope to demolish the four (now three) buildings around the Dirksen Courthouse.
    - Funding for demolition of the four (now three) buildings.
- Manage Federal Assets
  - There is no federal occupancy need for the buildings.

1.3.1 Security

As a federal facility, the Dirksen Courthouse and its occupants incur a need for increased security. In the wake of a bombing attempt on the Dirksen Courthouse in 2005, GSA requested congressional permission to allow the federal government to acquire land to create a security buffer zone integral to the security of the Dirksen Courthouse.

The federal government manages the Dirksen Courthouse. The federal judiciary, GSA, U.S. Marshals Service (USMS), and FPS are responsible for the management, operation, and security of federal courthouses. The security of the Dirksen Courthouse, 202, 214, and 220 South State Street, and the surrounding federally owned properties is the joint responsibility of the FPS and the USMS.

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 (Administrative Office of the U.S. Courts and USMS n.d.). Security criteria for viable adaptive reuse of 202, 214, and 220 South State Street were documented to address security risks and are specified in Section 2.1, Description of Evaluated Alternatives. The buildings at 202, 214, and 220 South State Street, in their current vacant state, also present a security risk, which should be mitigated by appropriate security measures until a development plan is identified and implemented (Administrative Office of the U.S. Courts and USMS n.d.).

FPS, USMS, the Federal Bureau of Investigation (FBI), and the federal judiciary examined the significant risks and security requirements of the Dirksen Courthouse and 202, 214, and 220 South State Street, and detailed their findings in the following documents:

- 2018 FBI security review (FBI 2018)
- 2018 U.S. District Court Northern District of Illinois assessment (U.S. District Court Northern District of Illinois 2018)
- Administrative Office of U.S. Courts Report and USMS assessment (Administrative Office of the U.S. Courts and USMS n.d.)

These reports validate that 202, 214, and 220 South State Street pose a significant risk to the Dirksen Courthouse and any future use would need to occur in accordance with federal requirements (Administrative Office of the U.S. Courts and USMS n.d.) and the viable adaptive reuse security criteria described in Section 2.1.2.

1.3.2 Congressional Intent

The 2022 Consolidated Appropriations Act (Public Law No. 117-103) made available to GSA $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." Before deciding to execute a project to use those funds for the purposes stated, GSA, as a federal agency subject to NEPA, must evaluate reasonable alternatives that would meet the purpose and need of the Proposed Action.

1.3.3 Managing Federal Assets

Under *United States Code* (U.S.C.) Title 40, Section 524, federal agencies are charged with numerous obligations generally directed toward the efficient use of federal real property resources. Federal agencies, including GSA, are required to reduce their real estate footprint in accordance with a series of presidential memorandums and implementation policies.

In 2004, the Administrative Office of the U.S. Courts imposed a moratorium on requests for increased space by federal courts (Administrative Office of the U.S. Courts 2004). This moratorium was initially for 1 year but has since been adopted by the Administrative Office of the U.S. Courts.

A 2010 Presidential Memorandum titled, *Disposing of Unneeded Federal Real Estate,* directed all federal agencies to take aggressive action to reduce the real property footprint. This document was followed by a 2012 Presidential Memorandum titled, *Promoting Efficient Spending to Support Agency Operations* (M-12-12), which directed federal agencies to freeze the growth of their real property inventories of office and warehouse space. Consistent with the 2012 Presidential Memorandum, the Office of Management and Budget (OMB) issued the *Freeze the Footprint* implementation policy. In 2013, OMB issued management procedures to all executive agencies with directions not to increase the total footprint compared to the previous year. In 2015, OMB issued a subsequent management procedures memorandum, which superseded the OMB Management Procedures Memorandum 2013-02 and clarified existing policy to dispose of excess properties and promote more efficient use of real property assets (OMB 2015).

The COVID-19 pandemic increased teleworking by federal employees, further reducing the federal government's need for office space. A 2022 U.S. Government Accountability Office report found limited reduction in federal government office space as of September 2022, but most agencies plan to reduce their leases or square footage in the next 3 years (U.S. Government Accountability Office 2022).

GSA determined that the federal government does not have the federal occupancy need for 202, 214, and 220 South State Street, as no federal program aligns with the properties. This is consistent with a recent U.S. Government Accountability Office report that notes federal agencies have had more office space than they need for some time, and increased teleworking by federal employees has further decreased the need for federal office space (U.S. Government Accountability Office 2023).

In November 2023, GSA announced that it is beginning the disposal process for 23 GSA-owned properties, including the William O. Lipinski Federal Building in Chicago. These properties amount to 3.5 million square feet of space that the federal government no longer needs (GSA 2024). Federal tenants, in the Lipinski Federal Building, will move to the Ralph H. Metcalfe Federal Building.

Since GSA's purchase of 202, 214, and 220 South State Street, GSA spends approximately $70,000 annually on scaffolding rentals and approximately $750,000 every 2 years for façade inspections and repairs, which does not include emergency repairs or security. Although the buildings are no longer needed for federal government occupancy, GSA owns the property's footprint to ensure the security of the Dirksen Courthouse.

1.4 Applicable Review Requirements

NEPA requires federal agencies to consider the potential impacts of their proposed actions on the environment. Under NEPA, federal agencies are required to consider effects to the environment in their decision-making and to disclose those effects to the public.

The NHPA further requires federal agencies to consider the effects to historic properties before making decisions and to engage with concerned parties regarding those effects.

In addition to the NHPA, several other executive orders guide GSA's treatment and use of historic properties. They are documented in GSA Order ADM 1020.3, issued in 2016 (GSA 2016).

The key components of public involvement during the NEPA and NHPA processes are as follows:

- Notice of Intent: Publication in the *Federal Register* provides official notification of the initiation of the EIS process and begins the scoping period.
- Public and Agency Scoping: A period for the public and government agencies to comment on the scope of issues to be addressed in the EIS, including, but not limited to, identifying significant issues, and eliminating from further study non-significant issues related to the Proposed Action.
- NHPA Consulting Party Meetings: NHPA requires GSA to consult with the Illinois SHPO as well as other agencies responsible for historic preservation, concerned local citizens, and groups with an interest in historic preservation (Consulting Party).
- Public Comment Period on the Draft EIS: The comment period allows the public and government agencies to review and provide comments on the published Draft EIS. The comment period was announced in a Notice of Availability published in the *Federal Register*.
- Final EIS: GSA is publishing this Final EIS, which considers public and agency comments on the Draft EIS and addresses them as necessary.
- Record of Decision (ROD): No sooner than 30 days after the publication of this Final EIS, GSA will publish the ROD, which concludes the NEPA process, states the decision made, identifies the alternatives that were considered, and specifies any mitigations to be implemented.

1.4.1 NEPA Public Participation

NEPA public participation opportunities are guided by GSA's NEPA-implementing procedures, GSA's *PBS NEPA Desk Guide* (GSA 1999b), the requirements of NEPA (40 CFR Section 1506.6), and the CEQ's regulations.

1.4.1.1 Scoping

A NEPA public scoping period occurred from October 28 through December 12, 2022. A detailed scoping report is included in Appendix A, Scoping Meeting Summary. The following sections summarize the scoping effort and comments received.

Notice of Intent

On November 1, 2022, GSA posted a Notice of Intent in the *Federal Register* to inform the public and government agencies of its plan to prepare an EIS for this Proposed Action and to announce a public scoping meeting and comment period (refer to Appendix A, Notice of Intent, in Appendix A, Scoping Meeting Summary).

Mailings and Newspaper Notices

On October 28, 2022, and November 7, 2022, GSA published newspaper notices in the *Chicago Tribune* and *Chicago Sun-Times*. The notices included information on the scoping meetings and process to submit comments. On the same day, GSA mailed 588 scoping meeting invitations to interested stakeholders, including members of the public, government agencies, non-government agencies, tribes, and adjacent property owners.

Website

On November 4, 2022, GSA published the announcement of the public scoping meeting and opportunity for comment on the GSA's Great Lakes Feature Stories and News Releases web page (GSA 2022).

Flyers

On December 7, 2022, GSA posted flyers around downtown Chicago to serve as a reminder of the scoping comment period. The flyers included information on how to submit scoping comments.

Scoping Meeting

A public scoping meeting was held in person and virtually via Zoom on November 10, 2022, from 4 p.m. to 7 p.m. at the Morrison Conference Center on the second floor of the Ralph H. Metcalfe Federal Building, 77 West Jackson Blvd., Chicago. The meeting began with a presentation from GSA on the Proposed Action and undertaking, followed by the opportunity for the public to provide verbal or written comments. Meeting materials, such as informational posters and fact sheets, were available. A total of 58 people attended the meeting, 16 in-person and 42 virtually via Zoom.

Summary of Scoping Comments

GSA received 178 comments during the scoping period. All comments received during the scoping process were considered by GSA during preparation of the EIS. These comments are provided in Appendix A, Scoping Meeting Summary, and are categorized into the following themes:

- **Environmental issues:** comments on embodied carbon, waste of resources, and long-term environmental impacts associated with potential changes to the local character, such as an increased reliance on cars due to loss of urban density.
- **Cultural significance:** comments on potential impacts to cultural resources, including the Loop Retail Historic District.
- **Security concerns:** questions regarding the reasons that 202-220 South State Street pose more of a risk to the Dirksen Courthouse than other buildings in the area, as well as why security measures such as internal measures, removing sightlines facing federal buildings, and removing windows are not being considered over demolition. There were also concerns about the safety of the area if the buildings were demolished.
- **Economic loss from demolition:** comments on the potential loss of tax revenue, tourism value, and investments in the South State Street corridor from demolition, in addition to use of taxpayer funds.
- **Alternatives:** comments on the number of action alternatives being analyzed and the security criteria for viable adaptive reuse limiting potential preservation and viable adaptive reuse options. Comments suggested analyzing additional action alternatives such as renovating buildings for affordable housing or as an archive center.
- **Demolition by negligence:** comments that the four buildings at 202-220 South State Street would be allowed to remain vacant and fall into disrepair.

Scoping comments were received by the following agencies:

- **U.S. Environmental Protection Agency (EPA)**: In a letter to GSA dated December 12, 2022, EPA provided recommendations on the preparation of the EIS, such as the project description, purpose, need, and range of alternatives. EPA also provided recommendations on assessing environmental resources, including hazardous materials released during demolition; air quality; children's health and safety; historic preservation and tribal resources; noise and vibrations; environmental justice and community impacts; and climate change, specifically evaluating and assessing the impacts of greenhouse gas (GHG) emissions and the social cost of carbon.
- **U.S. Fish and Wildlife Service:** In an email to GSA dated November 3, 2022, the U.S. Fish and Wildlife Service stated it had no substantive comments on the Proposed Action.
- **U.S. Geological Survey:** In an email to GSA dated November 3, 2022, the U.S. Geological Survey stated it had no comments on the Proposed Action.

Scoping comments were received from the following non-federal agency stakeholders:

- American Institute of Architects Illinois
- American Institute of Architects Chicago
- Chicago Collaborative Archive Center
- Landmarks Illinois
- National Trust for Historic Preservation
- Preservation Chicago
- City of Chicago Department of Planning and Development

GSA invited the following 13 tribes to the public scoping meeting and also invited them via letters sent on January 6, 2023, to consult on the Proposed Action:

- Citizen Potawatomi Nation
- Kickapoo Tribe of Oklahoma
- Miami Tribe of Oklahoma
- Peoria Tribe of Indians of Oklahoma
- Sac and Fox Nation of Oklahoma
- Forest County Potawatomi Community of Wisconsin
- Little Traverse Bay Bands of Odawa Indians
- Prairie Band of Potawatomi Nation
- Sac and Fox Nation of Mississippi in Iowa
- Hannahville Indian Community
- Menominee Indian Tribe of Wisconsin
- Ho-Chunk Nation
- Sac and Fox Nation of Missouri

Responses were received from the Forest County Potawatomi of Wisconsin and the Miami Tribe of Oklahoma. Both tribes accepted GSA's invitation to be Consulting Parties and both indicated that, at this time, they have no records of links to the project site (refer to Appendix B, Section 106 Consultation).

1.4.1.2 Draft EIS Public Comment Review Period

NEPA requires federal agencies to provide the public with an opportunity to review and comment on the Draft EIS.

Notice of Availability

A notice of the public hearing and Notice of Availability for the Draft EIS was published in the *Federal Register* on Friday, September 15, 2023. This notice formally announced the availability and opportunity for public review of and comment on the Draft EIS.

Advertisements for the Public Hearing and Draft EIS Comment Period

The availability of the Draft EIS and information on how to attend the public hearing and submit comments were advertised to the public in various channels. Paid advertisements were published in two Chicago newspapers. *Newcity*, a Chicago-based magazine, posted an article containing links to the Draft EIS and information on how to register for the hearing. GSA mailed invitation postcards with information on the Draft EIS and public hearing to 3,633 addresses, including relevant federal, state, and local agencies; non-governmental organizations; Native American tribes; Section 106 Consulting Parties; and other interested parties and addresses within a quarter-mile radius of the project area. Flyers were posted on and in buildings in downtown Chicago within the same radius. A press release announcing the public hearing was posted on the GSA Great Lakes Region 5 Newsroom website on September 20, 2023. Finally, the hearing was advertised as an event on Facebook and Patch. More information on the hearing, including copies of advertisements, is available 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).

Public Hearing

On Monday, October 2, 2023, GSA hosted a public hearing to provide an opportunity for public comment on the Draft EIS. The in-person and virtual hearing informed attendees about the Draft EIS findings and provided opportunities to submit comments on the Draft EIS to GSA during the public forum, directly to a court reporter, or with a written comment at the meeting, as well as information on how to provide comments after the hearing using a comment form (electronic or hard copy), email, or postal mail.

Comments on the Draft EIS

The Draft EIS comment period began on September 15, 2023, when the Notice of Availability of the Draft EIS was published in the *Federal Register* and closed on October 31, 2023. Comments could be submitted in writing via the Eventbrite public hearing registration, electronic comment form, paper comment form submitted during the hearing, email, or postal mail. Comments could also be submitted verbally to GSA during the public forum (in person or virtually) or to a court reporter. All comments were given the same consideration regardless of submission method.

Summary of Comments Received

GSA received 531 public and agency comments during the comment period. Of these, 16 were verbal comments made during the public hearing, 134 were unique written comments, and 396 were identical form letters received via email. GSA has provided responses to substantive comments (Table H-1 of Appendix H). Table 1-1 summarizes the key themes of comments received.

Table 1-1. Summary of Comments Received on the Draft EIS

Comment Topic	Summary of Comments
Environmental issues	Demolition would waste embodied carbon and existing resources, and long-term environmental impacts would include an increased reliance on cars due to loss of urban density.
Cultural resources	There would be impacts to cultural resources including the Loop Retail Historic District from demolition.
Security concerns	Comments included questions regarding the reasons that the buildings at 202, 214, and 220 South State Street pose more of a risk to the Dirksen Courthouse than other buildings in the area, as well as why security measures such as implementing internal measures, removing sightlines facing federal buildings, and removing windows are not being considered over demolition. There were also concerns about the safety of the area if the buildings were demolished.
Economic loss from demolition	There could be a potential loss of tax revenue, tourism value, and investments in the South State Street corridor from demolition, in addition to use of taxpayer funds.
Alternatives	Comments discussed the number of alternatives being analyzed and the security criteria for viable adaptive reuse limiting potential preservation and viable adaptive reuse options. Comments suggested analyzing additional alternatives such as renovating buildings for affordable housing or using them as an archive center.
Demolition by neglect	The buildings at 202, 214, and 220 South State Street would be allowed to remain vacant and fall into disrepair.

Comments were received by the following agencies:

- **Chicago Transit Authority (CTA):** In a comment sent to GSA via the online comment form on September 18, 2023, CTA asked GSA to coordinate with CTA at least 30 days in advance of any potential impacts to CTA's Red Line on State Street.
- **U.S. Department of the Interior:** In a letter sent to GSA on October 24, 2023, the department confirmed its review of the Draft EIS and noted that it had no comments at this time.
- **EPA Region 5:** In a letter to GSA dated October 25, 2023, EPA provided comments related to the alternatives GSA is considering, the NHPA, energy efficiency and environmental best practices during construction or demolition, and GHG emissions.

In addition, the National Park Service emailed a correction related to the Chicago skyline submittal to the United Nations Educational, Scientific and Cultural Organization (UNESCO) after the comment period ended (Section 3.5.1.4). GSA received the email after the comment period ended, but this Final EIS reflects the National Park Service's input.

Comments were received from the following non-federal agency stakeholders:

- City of Chicago Department of Planning and Development
- Chicago Collaborative Archive Center
- Landmarks Illinois
- National Trust for Historic Preservation
- Preservation Chicago
- Preservation Futures

Responses to Comments

GSA addressed comments received during the Draft EIS comment period in compliance with all applicable federal requirements and guidelines. Where appropriate, comments were incorporated into the EIS. All comments received and GSA's responses are in Appendix H.

1.4.2 National Historic Preservation Act Public Participation

Section 106 of the NHPA requires GSA to consider the effects of the Action Alternatives on historic properties and to provide opportunities for public input. Pursuant to the NHPA, GSA initiated the Section 106 process and the process is ongoing. GSA identified the Consulting Parties and has been consulting with the Illinois SHPO, ACHP, other agencies responsible for historic preservation, local citizens, and groups with an interest in historic preservation (consulting parties).

The first meeting with the Consulting Parties was held on January 19, 2023. After GSA consulted on the Area of Potential Effects (APE) boundary, GSA then consulted with the SHPO, ACHP, and other Consulting Parties to identify historic properties within the APE. GSA and its federal law enforcement and federal court partners briefed the Consulting Parties on the security risks to the Dirksen Courthouse building and its occupants and the building's unique role in the federal judiciary system due to the high number of trials held there and the high-profile nature of some of the recent trials. GSA also presented leasing to non-federal entities as a contracting method possible under the Viable Adaptive Reuse Alternative. GSA consulted with SHPO and other Consulting Parties before releasing its findings on whether the Action Alternatives are likely to result in an adverse effect on historic properties within the APE. To date, GSA has met with the Consulting Parties 12 times, most recently in July 2024.

Also, several Consulting Parties participated in charrettes sponsored by GSA in September 2023 and December 2023 to generate ideas for viable adaptive reuse. GSA used its Design Excellence Program to engage several members of its Peer Professionals[1] to lend their architectural expertise to GSA and the Consulting Parties. GSA met with the peers, and they participated in the first charrette and were invited to the second charrette.

The purpose of Charrette 1 in September 2023 was to engage the creativity of the Consulting Parties and peers to explore possible adaptive reuse approaches for the State Street buildings. Discussion topics included whether it is feasible to harden the Dirksen Courthouse and thereby soften the viable adaptive reuse security criteria, closing Quincy Court to vehicular traffic, separating out 202 South State Street from the other two buildings because it has no sightlines to the Dirksen Courthouse, and creating a plaza space on Quincy Court.

Charrette 2 in December 2023 engaged Chicago's real estate development community to gain a greater understanding of market conditions. The goal was to understand interest from the development community in the site, understand which components of the site are more viable or less viable, gauge how the market would respond to the security criteria, and understand which elements would need to be in place for redevelopment to be attractive. Participants recommended that GSA provide flexibility to redevelop all or part of the site. Several comments focused on the security criteria and preservation challenges. A summary of the charrette process is available on the GSA Great Lakes Region 5 website.

GSA continued to consult with the SHPO and other Consulting Parties to attempt to resolve potential adverse effects on historic properties. GSA and Consulting Parties developed a Programmatic Agreement that documents mitigation measures for the Viable Adaptive Reuse Alternative.

More detail on the Section 106 process is in Section 3.1, Cultural Resources, and Appendix B, Section 106 Consultation.

1.5 Organization of the EIS

This EIS includes the following sections:

- Section 1, Purpose and Need, describes the background, purpose, and need for the Proposed Action, the NEPA and NHPA and public involvement processes, and the scope of the EIS.
- Section 2, Description of the Proposed Action and Alternatives, presents the Action Alternatives and the No Action Alternative and provides a summary of the alternative evaluation process. Section 2.4 identifies the Environmentally Preferred Alternative, as required by 40 CFR 1505.2(b). The Environmentally Preferred Alternative "ordinarily. . . means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (CEQ 1986). Section 2.5 discloses GSA's Preferred Alternative. NEPA does not require the lead agency (GSA, for this Proposed Action) to select the Environmentally Preferred Alternative as its Preferred Alternative.
- Section 3, Affected Environment and Environmental Consequences, describes the affected environment and the environmental consequences of the Action Alternatives and the No Action Alternative. Mitigation measures are identified, as appropriate.

[1] https://www.gsa.gov/real-estate/design-and-construction/design-excellence-program

- Section 4, Cumulative Impacts, describes the cumulative impacts under the Action Alternatives and No Action Alternative.
- Section 5, References, provides a list of references used in the preparation of the EIS.
- Section 6, Distribution List, provides the distribution list for the EIS.
- Section 7, List of Preparers, provides a list of the names and qualifications of the EIS preparers.

All photos in the EIS were taken by Jacobs Technology, Inc. pursuant to a contract with GSA unless otherwise stated.

2. Description of the Proposed Action and Alternatives

The Proposed Action is to address the future of the three vacant buildings at 202, 214, and 220 South State Street in Chicago, Illinois. This section describes the Action Alternatives that meet the project's purpose and need as described in Section 1.3, Purpose and Need of the Proposed Action, along with the No Action Alternative. This section also discusses the alternatives eliminated from further consideration and the scope of the EIS, which includes resources eliminated from further study.

2.1 Description of Evaluated Alternatives

2.1.1 Alternative A, Demolition

Alternative A would involve the demolition of the three buildings at 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 Demolition Alternative would meet the purpose and need of the Proposed Action.

Before demolition would begin, the site would be prepared and secured to protect adjacent buildings, roads, and people. Protective measures such as protective scaffolding, fencing, stormwater protection systems, and staging areas would be installed. Additional protective scaffolding would be installed to shield The Berghoff restaurant and allow the restaurant to stay open during demolition, protecting their business, operations, and customers. The preparation of the site would also include surveying, preserving cultural items where possible, and removing hazardous materials.

The demolition process could occur concurrently, meaning the buildings would be demolished at the same time, or sequentially, meaning the buildings would be demolished one at a time. The demolition process would likely use a top-down method; however, it is possible that other methods could be used, and this would be determined by the demolition contractor. The top-down method, if implemented, would demolish the buildings floor by floor, starting at the top and moving down. Depending on the method of demolition, the entire process could take approximately 2 years to complete. The demolition process would occur in accordance with all local, state, and federal requirements including the 2022 Consolidated Appropriations Act (Public Law No. 117-103); GSA's *P100 Facilities Standards for the Public Buildings Service* (GSA 2021); *U.S. Courts Design Guide* (Judicial Conference of the United States 2021); Executive Order 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*; the Clean Water Act of 1972, as amended; and the Clean Air Act of 1970, as amended.

After demolition of the buildings, the area would then be graded, compacted, landscaped, and secured, in accordance with the 2022 Consolidated Appropriations Act. 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, which consists of a sidewalk with a CTA subway station elevator entrance at the center of the block adjacent to the primary doors. The space would serve as a meeting place for attendees at court proceedings, accommodate press events and other public gatherings relating to such proceedings, and could be integrated with the space created by demolition, providing more convenient public access to the Dirksen Courthouse. The expanded public area so created would also be available to

the public for cultural, educational, and recreational uses as provided for under the Public Buildings Cooperative Use Act (40 U.S.C. Section 3306).

2.1.2 Alternative B, Viable Adaptive Reuse

Alternative B would involve first collaborating with one or more developers who would use 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 meet the purpose and need of the Proposed Action upon satisfying the security needs of the Dirksen Courthouse.

The following list specifies the viable adaptive reuse security criteria developed by GSA in collaboration with the U.S. District Court for the Northern District of Illinois and federal law enforcement agencies. References to "developer" include lessees, tenants, or other occupants and users of the buildings:

1. The Federal government must retain ownership interests to achieve its security objectives, as determined by the government in its discretion.
2. Occupancy/Use: Properties shall not be used for short-term or long-term residential or lodging, places of worship, or medical treatment, services, or research. No use that requires access to outdoor areas is permitted.
3. Access to the roof is restricted to maintenance and repair activities. Personnel and materials that will be present in this area shall be subject to clearance and controls necessary to meet court security objectives.
4. Developer would have no access or use rights to Quincy Court.
5. Loading is prohibited in Quincy Court and otherwise restricted in a manner to achieve court security. Loading on State or Adams Streets would be subject to local ordinance requirements.
6. Occupants and users of the buildings shall have no sight lines into the Dirksen Courthouse, the Dirksen Courthouse ramp, or the Quincy Court properties owned by GSA.
7. No parking or vehicle access is permitted on or within the properties.
8. Developer is responsible for staffing, at their expense, security 24 hours a day with personnel approved by the Federal Protective Service or an entity to whom security services are delegated by Federal Protective Service.
9. Developer must obtain and maintain access control systems to prevent unauthorized access to any location within the structures. Each exterior entrance point must have an intrusion detection system and access control system installed, and Developer must provide federal law enforcement access to each system.

10. Developer must install and maintain interior and exterior security cameras and provide federal law enforcement officials with access and the ability to monitor the feeds in real time.
11. Developer must install exterior lighting necessary to achieve courthouse security objectives.
12. Perimeter Security: Developer must prevent unauthorized access to the properties that would result in an unapproved sight line.
13. Fire escapes, and any other structures that would allow access from the street, must be removed.
14. All construction documents and specifications for any renovation, rehabilitation, modification, or construction of any portion of the building (interior or exterior) will be subject to review and approval by federal law enforcement agencies.
15. No project may start without the advance approval of GSA.

Viable adaptive reuse would occur in accordance with all local, state, and federal requirements including the 2022 Consolidated Appropriations Act (Public Law No. 117-103); GSA's *P100 Facilities Standards for the Public Buildings Service* (GSA 2021); *U.S. Courts Design Guide* (Judicial Conference of the United States 2021); Executive Order 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*; the Clean Water Act of 1972, as amended; the Clean Air Act of 1970, as amended; and the Secretary of the Interior's Standards for the Treatment of Historic Properties.

2.2 Description of the 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. Since acquiring the properties, GSA spends approximately $70,000 annually on scaffolding rentals and approximately $750,000 every 2 years for façade inspections and repairs, which does not include emergency repairs or security.

GSA would continue to have limited federal funds available for maintenance. The No Action Alternative does not meet the purpose of the Proposed Action, which is to address security needs of the Dirksen Courthouse. This alternative is used as a baseline to evaluate the impacts of the Action Alternatives.

2.3 Other Alternatives Considered and Dismissed

GSA considered several other alternatives that were proposed during the public scoping process. Those alternatives and the reasons they were dismissed from consideration are explained in this section.

2.3.1 Retrofit the Dirksen Courthouse

Under this alternative, GSA would provide additional countermeasures to the Dirksen Courthouse to achieve security needs. This alternative was proposed to avoid demolishing 202-220 South State Street. As discussed in Section 1.3.1, Security, numerous studies by the FBI and USMS have demonstrated that additional countermeasures at the Dirksen Courthouse are cost prohibitive or not possible because of the design and construction of the Dirksen Courthouse. Additionally, other suggested countermeasures, such as blackout curtains, are not an acceptable

security standard and would not comply with the *U.S. Courts Design Guide* (Judicial Conference of the United States 2021). Therefore, this alternative was dismissed from further analysis.

2.3.2 Relocate the Dirksen Courthouse Functions

Under this alternative, GSA would relocate the Dirksen Courthouse functions to another location in a more secure area. This alternative was proposed to avoid demolishing 202, 214, and 220 South State Street and could include relocating the Dirksen Courthouse functions to a new building in a vacant lot or vacant building that could be repurposed in Chicago. Major federal courthouse construction and renovation projects usually cost hundreds of millions of dollars. As such, few projects can be funded at any one time, and the annual selection of courthouse projects is competitive. For example, in 2020, the federal judiciary identified a new courthouse in Hartford, Connecticut, as a top priority and subsequently the U.S. Congress authorized $355 million for site acquisition, design, and construction of the new 281,000-square-foot federal courthouse (GSA n.d.b). It is likely that Dirksen Courthouse, which is 1.4 million square feet and the largest federal courthouse in the country, would cost more than the construction of the smaller Hartford courthouse. GSA has not received congressional funding to relocate the Dirksen Courthouse functions. This alternative is cost prohibitive and not consistent with efforts by OMB and the Administrative Office of the U.S. Courts to reduce the federal government's office footprint. Therefore, this alternative was dismissed from further analysis.

2.3.3 Federal Occupancy of State Street Properties

Under this alternative, GSA would repair the buildings at 202, 214, and 220 South State Street and identify federal tenants for their occupancy, maintaining the historic integrity of the Loop Retail Historic District. As discussed in Section 1.2.2, Project History, 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) (refer to Appendix C). Therefore, this alternative was dismissed from further analysis.

2.3.4 Retrofit and Maintain State Street Properties

Under this alternative, GSA would retrofit the GSA buildings at 202, 214, and 220 South State Street to eliminate the existing concerns about the security of the Dirksen Courthouse and continue to maintain the properties without tenants. GSA does not have funds to implement this alternative, and this approach is contrary to the OMB directive to freeze or reduce the federal government's office footprint. Therefore, this alternative was dismissed from further analysis.

2.3.5 Government Sale of State Street Properties

Under this alternative, GSA would sell the GSA buildings at 202, 214, and 220 South State Street to a non-federal government entity. As discussed in Section 1.2.2, Project History, GSA previously attempted this process when the City of Chicago proposed to purchase 202-220 South State Street with the intention of selling to a private developer. However, in 2019, the City of Chicago withdrew its offer of the properties, because it could not overcome the security concerns of federal agencies regarding the redevelopment project, namely, to preserve a security buffer. The viable adaptive reuse security criteria do not allow for government sale of the properties. Therefore, this alternative was dismissed from further analysis.

2.3.6 Adaptive Reuse–Residential Redevelopment

Under this alternative, the three buildings at 202, 214, and 220 South State Street would be adapted as a residential housing project, with the possibility of affordable housing. In 2017, a developer proposed a $141 million project to redevelop 202-220 South State Street into a mixed-used development with 429 apartments and retail space. However, in 2019, the City of Chicago withdrew its purchase offer of the properties, citing the security concerns of federal agencies regarding the redevelopment project. Furthermore, the viable adaptive reuse security criteria do not allow for residences in 202, 214, and 220 South State Street. Therefore, this alternative was dismissed from further analysis.

2.4 Environmentally Preferred Alternative

The CEQ regulations for implementing NEPA require that the ROD discuss "the alternative or alternatives which were considered to be environmentally preferable" (40 CFR 1505.2(b)). The Environmentally Preferred Alternative is "the alternative that causes the least damage to the biological and physical environment. . . [and] best protects, preserves, and enhances historic, cultural, and natural resources" (CEQ 1986). The Environmentally Preferred Alternative does not need to be the same as the Selected Alternative because it does not consider the purpose and need of the Proposed Action. The CEQ recognizes that identifying the Environmentally Preferred Alternative may involve difficult judgments, particularly when one environmental value must be balanced against another. The CEQ encourages agencies to identify the Environmentally Preferred Alternative before the ROD.

For this project, there are two action alternatives: Alternative A, Demolition, and Alternative B, Viable Adaptive Reuse. These action alternatives and the No Action Alternative were evaluated for differences in resource impacts and the ability to mitigate each impact. The findings of this EIS identified both adverse impacts and benefits to the environment, summarized in Table ES-1. The Environmentally Preferred Alternative was identified by evaluating the environmental effects for each alternative using the impact analysis described in Section 3 and cumulative impacts described in Section 4 in this EIS, and input obtained during the public comment period.

The Proposed Action addresses the future of the three vacant buildings at 202, 214, and 220 South State Street in Chicago, Illinois. Considering that the Proposed Action is in a heavily urbanized environment, the built environment would be affected more than the natural environment, with the exception of air quality and GHG emissions.

During the Draft EIS comment period, cultural resources were the main concern, and nearly all comments related to cultural resources. The evaluation of each alternative took into consideration public concerns, impact analysis, cumulative impacts, and the level of mitigation required. Table 2-1 summarizes the Environmentally Preferred Alternative for each resource category.

Alternative B, Viable Adaptive Reuse, was identified as the Environmentally Preferred Alternative for cultural resources, aesthetic and visual resources, land use and zoning, community facilities, socioeconomics and environmental justice, and health and safety (Table 2-1). Alternative B's being the best outcome for cultural resources is particularly important because cultural resources have been identified as a main concern for the public. Alternative A, Demolition, and Alternative B, Viable Adaptive Reuse, are both the Environmentally Preferred Alternative for hazardous materials and solid waste. The No Action Alternative was identified as the Environmentally Preferred Alternative for GHG emissions; air quality; noise; and transportation and traffic. However, the No Action Alternative would not benefit cultural resources to the same extent as Alternative B because the buildings would remain in their current state.

In summary, Alternative B, Viable Adaptive Reuse, is the Environmentally Preferred Alternative because it would have the least effect to cultural resources, as well as many other resources.

Table 2-1. Summary of Environmentally Preferred Alternative by Resource Area

Resource Area	Environmentally Preferred Alternative
Cultural Resources	Alternative B, Viable Adaptive Reuse, would rehabilitate two buildings that are contributing elements of the Loop Retail Historic District and a third building that is considered contributing for this Proposed Action.
Aesthetic and Visual Resources	Alternative B, Viable Adaptive Reuse, would create less of a visual change than Alternative A, Demolition.
Land Use and Zoning	Alternative B, Viable Adaptive Reuse, would be more compatible with the City of Chicago's planning efforts than Alternative A, Demolition.
Community Facilities	Alternative B, Viable Adaptive Reuse, would have no direct impacts on community facilities, and there would be a beneficial, minor, long-term impact depending on the type of reuse and development.
Socioeconomics and Environmental Justice	Alternative B, Viable Adaptive Reuse, would improve the local economy by increasing employment opportunities and supporting the Chicago Loop Alliance's effort to revitalize South State Street.
Greenhouse Gas Emissions	The No Action Alternative would have the least emissions because the buildings would be vacant, not consume fuel or electricity, and not generate waste.
Hazardous Materials and Solid Waste	Alternative A, Demolition, and Alternative B, Viable Adaptive Reuse, would reduce hazardous materials onsite by removing them during renovation.
Air Quality	The No Action Alternative would not generate emissions.
Noise	The No Action Alternative would not have a construction noise impact.
Health and Safety (Including Protection of Children)	Alternative B, Viable Adaptive Reuse, would have no impacts to children and would create less air pollution and noise than Alternative A, Demolition. It would also protect the surrounding area from decaying buildings from the No Action Alternative.
Transportation and Traffic	The No Action Alternative would result in no changes to transportation or traffic during construction.

2.5 Preferred Alternative

GSA's Preferred Alternative is Viable Adaptive Reuse (Alternative B). GSA will pursue viable adaptive reuse under the NHPA Section 111 outlease authority. GSA will issue a Request for Lease Proposals (RLP) to seek a reuse that meets the purpose and need for the Proposed Action.

The Viable Adaptive Reuse Alternative meets the purpose and need for the Proposed Action upon satisfying the security needs of the Dirksen Courthouse. Therefore, GSA will 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. There are no federal funds available for reuse or proposed deviations from the security criteria. The RLP will allow for redevelopment of all buildings and parcels at 202 through 220 South State Street or one, two, or all three buildings in a manner that addresses the purpose and need.

GSA identifies Viable Adaptive Reuse (Alternative B) as its Preferred Alternative for the following reasons:

- Through the NHPA Section 106 consultation process, GSA was encouraged by most Consulting Parties to further explore the viability of adaptive reuse alternatives. A Programmatic Agreement, developed among GSA, the Illinois SHPO, and the ACHP and in consultation with numerous additional Consulting Parties, identified measures to avoid, minimize, or mitigate potential adverse effects on the historic buildings for the viable adaptive reuse alternative.
- The NEPA public engagement process received comments mostly in support of viable adaptive reuse. Of the 531 public comments received, 529 supported reuse.
- The Draft EIS identified two resources that would benefit from the Viable Adaptive Reuse Alternative: cultural resources and land use. GSA recognizes the historic significance of 202, 214, and 220 South State Street and their contribution to the Loop Retail Historic District. The Viable Adaptive Reuse Alternative will avoid or minimize adverse effects on the NRHP-listed Loop Retail Historic District and other historic properties in the APE and will mitigate if there are unavoidable adverse effects. The Programmatic Agreement stipulates mitigation requirements. A draft of the Programmatic Agreement is in Appendix B. The Viable Adaptive Reuse Alternative will align with City of Chicago land use plans that call for continued retail and mixed land use at State Street as well as reducing waste and reusing materials.

After the Final EIS review period ends, GSA will issue a ROD. The ROD and RLP will be issued concurrently. GSA may amend the ROD if no RLP responses are received or accepted by GSA.

2.6 Scope of the EIS

For this EIS, GSA evaluated the potential impacts of the Action Alternatives on the environment. The potential direct, indirect, and cumulative impacts of each alternative are evaluated for the following resource categories:

- Cultural Resources
- Aesthetic and Visual Resources
- Land Use and Zoning
- Community Facilities

- Socioeconomics and Environmental Justice
- GHG Emissions
- Hazardous Materials and Solid Waste
- Air Quality
- Noise
- Health and Safety
- Transportation and Traffic

The following resources were evaluated and eliminated from further analysis:

- Biological Resources: The project site is in a highly urbanized area of Chicago. The site is largely paved without substantial vegetation. The site does not support habitat for threatened or endangered species. A review of Illinois EcoCAT and U.S. Fish and Wildlife Service lists indicated no record of state or federally 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 (Appendix D, Agency Correspondence). Therefore, biological resources would not be impacted by the Action Alternatives.
- Geology, Soils, and Topography: Ground-disturbing activities would occur under the Action Alternatives. Standard construction best management practices (BMPs), such as erosion control measures, would be implemented.
- Water Resources and Quality: No bodies of surface water, groundwater aquifers, or floodplains are on, or adjacent to, the project site, and it is not within the 1 percent annual chance or 0.2-percent annual chance floodplain (FEMA 2021). Under the No Action Alternative and the Viable Adaptive Reuse Alternative, no change to the amount of impervious surface would occur. Under the Demolition Alternative, the site would be landscaped, which would decrease the impervious surfaces and the drainage conditions would not be altered. Section 438 of the Energy Independence and Security Act provides stormwater management guidance for federal development or redevelopment projects with more than 5,000 square feet of land disturbance in any manner that diverges from the area's present-day use and composition. Section 438 requires that federal projects maintain or restore the "pre-development hydrology" (the stormwater runoff characteristics of the site in its natural state, prior to human development) of the project area. Stormwater management practices, often referred to as "green infrastructure" or "low impact development practices," would be implemented, where needed. Additionally, standard BMPs would be implemented during construction.
- Coastal Zones: The Coastal Zone Management Act establishes a national policy to preserve, protect, develop, restore, and enhance the resources within the nation's coastal zones. Federal agencies are responsible for making consistency determinations within coastal zone areas. The project site is in Illinois's coastal zone area; however, the Action Alternatives would have no effect on coastal zone resources in Illinois and would be consistent with the Illinois Coastal Management Program. GSA provided the Illinois Department of Natural Resources with the negative determination for this project (refer to Appendix D, Agency Correspondence).
- Utilities: If demolition were to occur, coordination between GSA, the city, and utility companies to turn off, disconnect, and cap various utilities would be required. However, no substantial changes to existing utilities would occur under the Action Alternatives, as none would require an additional resource or increase in utility demands.

3. Affected Environment and Environmental Consequences

This section explains the affected environment for each of the potentially impacted resources and explains the potential environmental consequences associated with the Proposed Action, as implemented through Alternative A, Demolition; Alternative B, Viable Adaptive Reuse; and the No Action Alternative. Resource areas analyzed in this EIS are cultural resources; aesthetic and visual resources; land use and zoning; community facilities; socioeconomics and environmental justice; GHG emissions; hazardous materials and solid waste; air quality; noise; health and safety; and transportation and traffic.

The **Affected Environment** sections describe the existing natural and built environment in the project area. In compliance with NEPA, the description of the affected environment focuses on those resources and conditions potentially impacted by the Proposed Action.

The sections are organized by resource and describe the existing environment for each resource. For most resources, the affected area is limited to the Loop neighborhood. However, for some resources, the potential effects of the project must be considered within the context of the surrounding vicinity. Resources that occur across a broader area such as air quality were considered on a larger scale depending on resource-specific guidance.

The purpose of NEPA is to inform decision makers and the public of the likely **Environmental Consequences** of the Proposed Action. Consistent with these requirements, the Environmental Consequences sections describe the potential direct and indirect effects of the Proposed Action on each resource as implemented through Alternative A, Demolition; Alternative B, Viable Adaptive Reuse; and the No Action Alternative.

According to the CEQ NEPA Regulations at 40 CFR Parts 1500-1508, direct effects "are caused by the action and occur at the same time and place" while indirect effects "are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems."

The impact analysis focuses on issues in proportion to the degree of impact within the region of influence. Under NEPA (40 CFR Section 1508.27), a determination of significance requires consideration of context and intensity. Accordingly, impacts described in this EIS are evaluated in terms of type (beneficial or adverse), duration (temporary or permanent), and intensity (none, negligible, minor, moderate, or significant). These terms are further defined in tables in each resource section. General intensity thresholds for the resources analyzed in Section 3 are shown in Table 3-1.

Table 3-1. Summary of Environmental Impact Parameters

Parameter	Impact	Description
Impact Intensity	None	There is no impact compared to current conditions.
	Negligible	The impact is not measurable or discernable from current conditions.
	Minor	The impact is slight but detectable from current conditions.
	Moderate	The impact is readily apparent, and there would be a noticeable change from current conditions.
	Significant	The impact is severe, significant, and highly noticeable.
Geographic Context	Site-specific	Impacts are limited to the 202, 214, and 220 S. State Street buildings, and associated project boundaries.
	Local	Impacts extend beyond the 202, 214, and 220 S. State Street buildings and associated project boundaries, affecting the area in the general vicinity of the project area.
	Regional	Impacts affect a larger area, such as Cook County.
Quality	Beneficial	The impact would have a positive impact on the resource.
	Negative	The impact would have an adverse impact on the resource.
Duration	Short-term	Impacts would be temporary and occur only during adaptive reuse/demolition.
	Long-term	Impacts would occur after adaptive reuse/demolition.

Mitigation measures or BMPs that GSA would implement to avoid or minimize potential impacts are identified, when relevant. As required under NEPA, the environmental effects of the No Action Alternative are also evaluated as the environmental baseline for this analysis.

3.1 Cultural Resources

Cultural resources are products of history and culture, which may include historic architectural resources such as buildings and bridges, prehistoric and historic archaeological sites, historic districts, landscapes, sacred sites, and archaeological collections. Cultural resources also encompass historic properties, which are districts, sites, buildings, structures, and objects included in, or eligible for, the National Register. Under Section 106 of the NHPA, the eligibility of historic properties is determined by the lead federal agency, in consultation with the SHPO. For this Proposed Action, no significant cultural resources under NEPA have been identified that are not also historic properties under Section 106.

The two primary federal regulations that apply to cultural resources and historic properties are NEPA and NHPA. One of the mandates of NEPA is to "preserve important historic, cultural, and natural aspects of our national heritage" (42 U.S.C. Section 4331). The implementing regulation for NHPA (54 U.S.C. Sections 306108 et seq.) is the "Protection of Historic Properties" (36 CFR Part 800). As stated in 36 CFR Section 800.8(a)(1), NHPA encourages federal agencies to coordinate compliance with NEPA to maximize the timely and efficient execution of both statutes.

3.1.1 Affected Environment

3.1.1.1 Section 106 Process

The Proposed Action is considered a federal undertaking and requires compliance with Section 106 of NHPA. Section 106 is a procedural law, and the regulations in 36 CFR Part 800 provide the step-by-step approach for completing the Section 106 process. The steps are as follows:

- Initiate consultation – Determine whether the project is an "undertaking" under Section 106 of the NHPA.
- Identify historic properties – Establish APE, identify potential historic properties within it, and evaluate those properties for National Register eligibility.
- Assess effects – Assess how the undertaking could affect historic properties, including application of the criteria of adverse effect.
- Resolve adverse effects on historic properties, if necessary – If there are adverse effects to historic properties, reach agreement on how they will be avoided, minimized, or mitigated.

Historic properties are identified, and the effects are evaluated, in consultation with the Illinois SHPO and other Consulting Parties. Under Section 106, consulting parties are individuals or organizations with an interest in historic preservation who wish to participate in the consultation process.

GSA, as the lead federal agency under Section 106 for this Proposed Action, has consulted with the Illinois SHPO, the ACHP, and numerous other Consulting Parties they have invited to consult on this undertaking. A list of invited Consulting Parties and copies of correspondence are found in Appendix B, Section 106 Consultation.

The Section 106 process for the Proposed Action is ongoing. GSA initiated consultation and established the APE. GSA developed an initial APE in September 2022. In a letter to GSA dated December 13, 2022, SHPO recommended that the APE be enlarged to encompass the entirety of the National Register–listed Loop Retail Historic District because the buildings at 202, 214, and 220 South State Street are within the district. In response, GSA revised the APE accordingly. Additionally, considering the SHPO's comments, GSA enlarged the APE to include the entire South Dearborn Street-Printing House Row North Historic District. This district is listed in the National Register and is a National Historic Landmark (NHL). More than half of the district was within the initial APE boundary. The refined APE was shared with Consulting Parties in January and February 2023. After receiving comments about the APE's boundaries from a few of the Consulting Parties, GSA completed additional viewshed analysis to determine if further enlargement was warranted. GSA concluded that the revised APE was appropriate without further changes and received SHPO concurrence in March 2023.

GSA identified historic properties in the APE in consultation with the SHPO and the other Consulting Parties, and completed an assessment of effects of the Proposed Action on those historic properties. GSA found that the Proposed Action would have an adverse effect on historic properties under Section 106. SHPO concurred with the determinations of eligibility for historic properties as well as the effect findings on October 16, 2023, and concurred with the findings of the archaeology report on November 22, 2023. GSA made minor revisions to the *Architectural Resources Survey Report and Assessment of Effects to Historic Properties* in response to comments received and submitted the final report to SHPO on December 11, 2023.

The first Consulting Parties meeting was on January 19, 2023. Consulting Party meetings occurred approximately once a month through September 2023, paused while the charrette process took place, and resumed in February 2024. Twelve Consulting Party meetings have occurred to date:

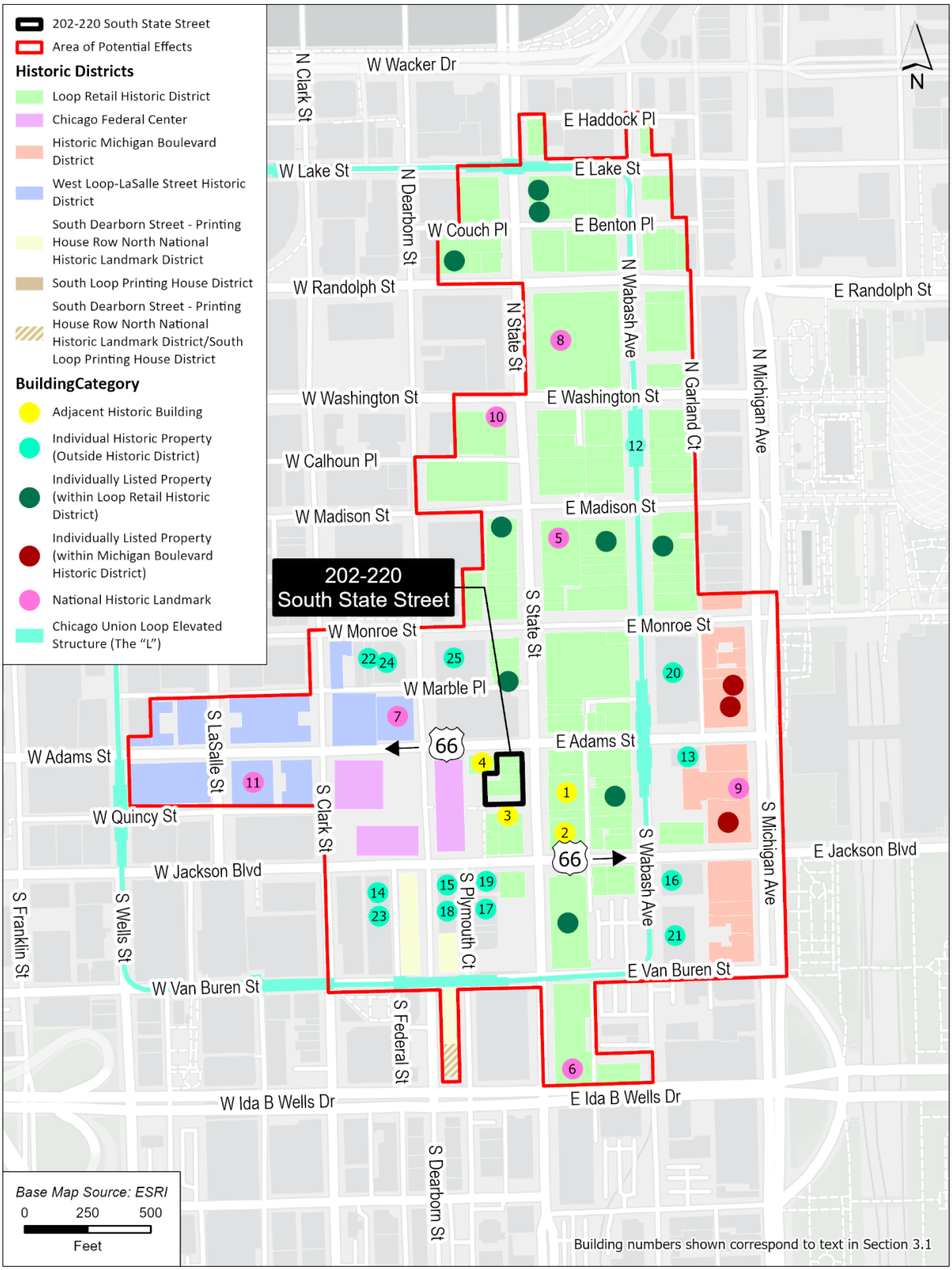
- January 19, 2023: Consulting Parties were introduced to each other, received an overview of Section 106, and discussed ways to seek agreement on avoiding or resolving potential adverse effects to historic properties.
- March 1, 2023: Discussed APE and Section 106 Consultation Plan.
- March 30, 2023: Presentation on Conditions Assessment.
- April 25, 2023: Presentation on security needs for the Dirksen Courthouse.
- June 9, 2023: Identification of historic properties and discussion of GSA ownership and leasing options.
- July 18, 2023: Recap of historic properties in the APE, discussion of effects to those historic properties, and discussion of adaptive reuse ideas submitted by Consulting Parties.
- September 13, 2023: Continued discussion of historic properties and effects to them; explanation of programmatic agreement process; and overview of the upcoming charrettes.
- September 28, 2023: Charrette #1. The goal was to explore possible adaptive reuse approaches and identify strategies to enhance the viable adaptive reuse of the buildings.
- December 8, 2023: Charrette #2. The goal was to engage with the development community to gain a greater understanding of market conditions.
- February 21, 2024: Summary of the charrette process and discussion of the draft Programmatic Agreement.
- March 26, 2024: Review of the second draft of the Programmatic Agreement, which was revised to include comments and suggestions from the previous meeting, and further discussion of potential mitigation measures.
- April 22, 2024: Discussion of the Charrette Summary Report and review of the revised second draft of the Programmatic Agreement and ranked mitigation ideas. Discussed next steps in the Section 106 process including review of the Charrette Summary Report, selection of mitigation measures, and the Programmatic Agreement.

As part of the Section 106 process, GSA drafted a Section 106 Programmatic Agreement that stipulates measures to avoid, minimize, and mitigate adverse effects to historic properties.

3.1.1.2 Area of Potential Effects

The study area for significant cultural resources and historic properties is equivalent to the APE under Section 106. GSA established the APE, illustrated on Figure 3.1-1, in consultation with the SHPO in late 2022. Because the three buildings at 202, 214, and 220 South State Street are in the Loop Retail Historic District, the APE includes the entire district. This was done because the Proposed Action has the potential to affect the district as a whole in addition to the individual subject buildings. It also includes the South Dearborn Street-Printing House Row North National Historic Landmark District, which is southwest of 202, 214, and 220 South State Street (south of Jackson Boulevard and west of South Plymouth Court), as well as portions of other known historic districts. The APE encompasses an area where historic properties could potentially experience direct or indirect effects from the Proposed Action. Therefore, the APE includes more than 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. The archaeological part of the APE is the footprint of the property on which the buildings at 202, 214, and 220 South State Street stand. This is where ground-disturbing activities could take place if demolition occurs. GSA evaluated all properties within the APE to determine their National Register eligibility, regardless of date built. This evaluation included those already listed or determined eligible to ensure they retained their integrity, as well as 24 properties outside historic districts (Appendix B).

Figure 3.1-1. Area of Potential Effects



Refer to Table 3.1-1 for corresponding building identification numbers.

Table 3.1-1. Historic Properties in the APE

ID	Name	Address	Notes
1	Woolworth Building	20-30 North State Street	Adjacent to 202-220 South State Street
2	Lytton Building	235-243 South State Street	Adjacent to 202-220 South State Street
3	Benson and Rixon	230 South State Street	Adjacent to 202-220 South State Street
4	The Berghoff Restaurant (Stone and Palmer Buildings)	15-27 West Adams Street	Adjacent to 202-220 South State Street
5	Schlesinger & Mayer Department Store (Carson, Pirie, Scott & Co. Department Store)	1-31 South State Street	National Historic Landmark
6	Second Leiter Building (Sears, Roebuck & Co., Robert Morris College)	401-441 South State Street	National Historic Landmark
7	Marquette Building	140 South Dearborn Street	National Historic Landmark
8	Marshall Field and Company Department Store	101-139 North State Street	National Historic Landmark
9	Orchestra Hall (Theodore Thomas Orchestra Hall)	220 South Michigan Avenue	National Historic Landmark
10	Reliance Building	32-36 North State Street	National Historic Landmark
11	Rookery Building	209 South La Salle Street	National Historic Landmark
12	The "L"	Lake Street, Wabash Avenue, Van Buren Street, Wells Street	Individual Historic Property partially outside of a historic district
13	Chapin and Gore Building	63 East Adams Street	Individual Historic Property outside of a historic district
14	Union League Club of Chicago	65-67 West Jackson Boulevard	Individual Historic Property outside of a historic district
15	33 W. Jackson Boulevard	33 West Jackson Boulevard	Individual Historic Property outside of a historic district
16	Continental Center II	55 East Jackson Boulevard	Individual Historic Property outside of a historic district
17	City Club	315 South Plymouth Court	Individual Historic Property outside of a historic district

ID	Name	Address	Notes
18	Standard Club	306-332 South Plymouth Court	Individual Historic Property outside of a historic district
19	Sears Building	17-23 West Jackson Boulevard	Individual Historic Property outside of a historic district
20	Mid-Continental Plaza	50 East Monroe Street	Individual Historic Property outside of a historic district
21	333 South Wabash, "Big Red" formerly CNA Center, Continental Center III	333 South Wabash Avenue	Individual Historic Property outside of a historic district
22	Italian Village Restaurant	71 West Monroe Street	Individual Historic Property outside of a historic district
23	Chicago Engineers Club	314 South Federal Street	Individual Historic Property outside of a historic district
24	Xerox Center (55 West Monroe)	55 West Monroe Street	Individual Historic Property outside of a historic district
25	Skidmore, Owings & Merrill Building	33 West Monroe Street	Individual Historic Property outside of a historic district

3.1.1.3 Cultural Resources in APE

Architectural Resources

Century and Consumers Buildings and 214 South State Street

The Century Building at 202 South State Street, the Consumers Building at 220 South State Street, and 214 South State Street are the historic properties that are part of the Proposed Action. They qualify as historic properties because they are contributing resources to the Loop Retail Historic District. The Century and Consumers Buildings were noted as contributing to the historic district when it was listed in the National Register. 214 South State Street was found not contributing 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-style[2] storefront from the 1940s, which falls within the period of significance for the Loop Retail Historic District, and it appears to retain its upper-story fenestration from that era as well. Therefore, GSA is considering 214 South State Street as contributing to the historic district for purposes of this undertaking,

Historic preservation organizations have recognized the architectural importance of the Century and Consumers Buildings and have raised concerns about potential demolition. Preservation Chicago listed the buildings on its "Chicago 7 Most Endangered" list in 2011, 2013, 2022, 2023, and 2024 (Preservation Chicago 2023). Landmarks Illinois put them on its "Most Endangered

[2] The Moderne style of architecture is closely related to art deco. It originated in France in the 1920s (Sharp 2002).

Historic Places in Illinois" list in 2022 and 2023 (Landmarks Illinois 2023). The National Trust for Historic Preservation listed them on its "America's 11 Most Endangered Historic Places" list in 2023 (National Trust for Historic Preservation 2023). In response to this concern, GSA invited these groups to participate as Consulting Parties in the Section 106 process.

On May 4, 2023, the Commission on Chicago Landmarks voted to approve the reports recommending local landmark status for the Century and Consumers Buildings. GSA, as the property owner, has no position either for or against the landmarking but acknowledges the historic and architectural significance of these properties, which are listed in the National Register as part of the Loop Retail Historic District. Under Section 106 of the NHPA, discussed in Section 3.1.1.1, Section 106 Process, this significance is recognized and taken into account, requiring GSA to consider possible effects to these properties from its actions. Much like the Chicago Landmarks process, Section 106 seeks to avoid adverse effects to significant historical or architectural features of the properties, and the Section106 process must be concluded before any renovation or demolition can occur. Because the U.S. Constitution declares that federal law is "the supreme law of the land," federal law supersedes local laws, meaning that GSA, while respecting the Chicago Landmarks designation, is bound by the outcome of the Section 106 process rather than the local landmark process.

The following sections provide a detailed overview of the buildings.

The Century Building, 202 South State Street, on the southwest corner of the South State Street and West Adams Street intersection, was designed by the well-known architectural firm Holabird and Roche. Built in 1915, the 16-story, steel-framed commercial building is primarily clad in cream-colored terra-cotta; the windowless rear (west) and south elevations[3] are clad in common brick. The building has notable terra-cotta decoration featuring Gothic-inspired motifs, such as shields with dragons, as well as naturalistic designs. The 16th floor features flamboyant terra-cotta ornamentation (Figure 3.1-2). The building has a distinctive recessed corner entrance with a revolving door fronted by large, stainless-steel columns as well as a second entrance at the southern end of the South State Street elevation marked by double doors, gray granite, and metal lettering providing the address. Windows on the 2nd floor have been removed and corrugated panels installed in their place. Windows on the 3rd to 15th floors remain and are original to the building. The upper levels of the rear (west) side feature a six-story sign advertising Home Federal Bank, painted directly on the brickwork (GSA 2023a).

Building changes, renovations, and repairs occurred through the 1950s. From the 1990s to current day, most work on the building has been exterior masonry repairs and replacement of six concrete lintels.[4] The building has been vacant since the mid-1980s (DMJM 2009). The building's exterior upper floors are currently in deteriorated condition (GSA 2023a). Scaffolding protects pedestrians from falling masonry. In November 2020, GSA's façade inspection revealed that the parapet on the Century Building had deteriorated to the point at which its structural columns could no longer resist wind and gravity loads, and the contractor recommended intervention by either restoring or removing the parapet. In addition, the fire escape on the north side of the Century Building had severe corrosion. The contractor noted that the fire escape was a potential fall hazard and recommended removing or repairing it. In response, GSA agreed to remove the parapet structure, document and carefully disassemble the terra-cotta units, and catalog and crate the salvaged terra-cotta units to allow for reinstallation during a future restoration effort. GSA also agreed to

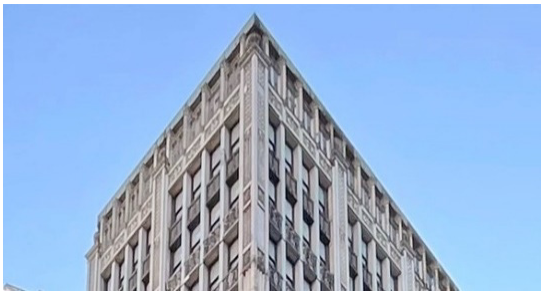
[3] In the construction industry, the term "elevation" generally refers to the exterior or face of a building. Elevation, or face, is viewed as if a person is looking at a building from the front, back, or side.

[4] A lintel is a horizontal beam over a doorway or other opening in a building's exterior.

remove the fire escape and salvage, crate, and store its decorative horizontal railings, with and without center medallions, for documentation and future reuse. This was done as a separate undertaking under Section 106 and GSA determined that it would have No Adverse Effect to Historic Properties. SHPO agreed that if these steps were taken, the undertaking would comply with the Secretary of the Interior's Standards and result in no adverse effect.

The Century Building is significant for its role in signaling the transition from the Chicago school of architecture (Chicago school) buildings of the late nineteenth century to the art deco style of the 1920s, and for the unique design of its terra-cotta ornament (GSA 2023a). The architects that designed it, Holabird and Roche, developed and refined the style of the tall commercial office building in Chicago as they constructed dozens in the City and many more across the Midwest (Chicago Architecture Center 2023a).

Figure 3.1-2. Century Building 16th-floor Terra-cotta Ornamentation



The Consumers Building, 220 South State Street, designed by the architecture firm Jenney, Mundie and Jensen, was built in 1912 to 1913. It is 21 stories with a rectangular footprint and a slightly rounded southwest corner, and features windows on all four sides. It has a steel superstructure and is clad in white terra-cotta. The main entrance on South State Street features a revolving door and two glass hinged doors framed in bronze, surrounded by polished granite, and ornamented with the words "1 Quincy Court" in metal lettering. Flanking this entry are contemporary metal storefronts with a metal signboard above that turns the corner and extends the length of Quincy Court. On both street elevations, floors two through four feature signature Chicago windows, which means they have one large, fixed pane flanked by double-hung windows. Decorations above the 2nd-, 3rd-, 18th-, and 19th-floor windows feature geometric motifs of a rectangle flanked by diamonds (Figure 3.1-3). All other floors feature a rectangle above each window (GSA 2023b). Like the Century Building, the Consumers Building has had alterations, remodels, and repairs over its century-plus life. The building's exterior upper floors have deteriorated.

The Consumers Building's significance lies in its late-stage Chicago school design and its association with architectural firm Jenney, Mundie and Jensen. William Le Baron Jenney was the pioneer of steel-supported buildings, which allowed taller buildings than traditional brick-and-stone construction. He influenced the shape of the Chicago skyline and influenced a generation of important Chicago architects, including Holabird and Roche, designers of the Century Building (Chicago Architecture Center 2023a). Jenney's firm designed numerous National Register–listed buildings in Chicago.

Figure 3.1-3. Consumers Building Chicago Windows and Geometric Motifs

214 South State Street is a four-story masonry building that was formerly a retail men's clothing store called Roberto's. The date of construction is unknown, but it may be 1883 (Preservation Chicago 2023). Its original architect was C.M. Palmer for Gunther's Confectionary (Preservation Chicago 2023). In the 1920s, it was remodeled by Jenney Mundie & Jensen, the Consumers Building architects, and used as the Consumers Building Annex. It was remodeled again circa 1949 by Isadore E. Alexander for Martin Jewelers (Preservation Chicago 2023). This appears to be the current Moderne-style ground floor storefront with a deeply recessed entrance flanked by display windows trimmed with black Carrera glass and silver metal. The south display space is rectilinear, whereas the north display space is angled away from the door and has a round/curved-glass display area at the sidewalk. "Roberto's" spans the façade above the storefront. The upper three stories are clad with circa 1960 metal panels, but upper-story fenestration from the 1940s appears to remain underneath.

Figure 3.1-4. 214 South State Street 1940s Storefront (photo credit: Charlie Young, Interactive Design Architects)

Loop Retail Historic District

The buildings at 202, 214, and 220 South State Street are in the Loop Retail Historic District, which was listed in the National Register in 1998. The National Register nomination form notes that the district "represents the history of retail shopping, luxury wholesale trade, professional and personal services, theatres and hotels in Chicago. The district is located in the heart of Chicago's Loop downtown business district and includes properties along eight blocks of State Street and Wabash Avenue (both north-south commercial streets, one block apart), and their cross streets, bounded by Lake Street on the north and Ida B. Wells Parkway (formerly Congress Parkway) on the south. The district historically has comprised Chicago's main shopping district and the retail core of downtown" (Tatum 1998). It also contains the 1943 State Street Subway (Red Line) that runs underneath State Street as well as part of the pedway. The pedway is a system of underground tunnels and overhead bridges in the Loop that connects public and private buildings, subway and elevated stations, and commuter rail facilities throughout more than 40 blocks. The underground portion of the pedway was constructed via tunneling beginning in 1939 (Wight and Company 2006). There are three pedways in the APE. One links subway stations on State Street (Red Line) and Dearborn Street (Blue Line). A second zigzags from east of Wabash Avenue, below the Marshall Field and Company Department Store, and past State Street, connecting both subway lines. A third travels below Michigan Avenue from the Railway Exchange Building to Van Buren Street. Additional underground tunnels exist along the periphery of the APE. The subway under State Street is mentioned in the Loop Retail Historic District nomination, but the nomination did not evaluate it as part of the district. The pedways are not included in the Loop Retail Historic District nomination. Part of both subways and part of the pedway are in the APE but are underground and have no potential to be affected by the undertaking.

All of the buildings in the Loop Retail Historic District were built after the 1871 Chicago fire. A few early post–Chicago fire loft buildings are in the district, as are "several major department store buildings important to the history of retail development and influential examples of the Chicago School of architecture." State Street maintains its overall historic appearance from its period of significance, which was 1872 to 1949 (Tatum 1998).

The Loop Retail Historic District contains 109 buildings, of which 13 are buildings that were already determined as individually eligible for the National Register before the Loop Retail Historic District was established, 74 are buildings that were deemed to be contributing to the district, and 22 are not contributing to the district. In addition, 4 of the 33 NHLs in Chicago are in the Loop Retail Historic District. The Century Building and the Consumers Building are contributing buildings[5] to the Loop Retail Historic District. The building at 214 South State Street was found not contributing to the Loop Retail Historic District when it was listed in the National Register because it lacked integrity due to extensive exterior alterations. However, it retains a distinctive Moderne-style[6] storefront from the 1940s, which falls within the period of significance for the Loop Retail Historic District, and it appears to retain its upper story fenestration from that era as well. GSA is considering 214 South State Street as contributing to the historic district for purposes of this undertaking, which brings the total of contributing resources in the Loop Retail Historic District to 75 for this undertaking. A table of all known historic properties within the APE is in Appendix B, Section 106 Consultation.

[5] "A contributing building, site, structure, or object adds to the historical associations, historic architectural qualities, or archeological values for which a property is significant because . . . it was present during the period of significance, relates to the documented significance of the property, and possesses historic integrity" (NPS 1997).

[6] The Moderne style of architecture is closely related to art deco. It originated in France in the 1920s (Sharp 2002).

Adjacent Contributing Buildings within the Loop Retail Historic District

Several other buildings adjacent to the Century and Consumers Buildings in the 200 block of South State Street and on West Adams Street between State and Dearborn Streets are also contributing elements of the Loop Retail Historic District. The following buildings have the most direct visual connection to the Century and Consumers Buildings: Woolworth Building, Lytton Building, Benson & Rixon Building, and Stone Building (The Berghoff).

Woolworth Building, 219-221 South State Street *(No. 1 in Table 3.1-1 and on Figure 3.1-1)*

This Moderne-style building is across the street from the Consumers Building. It was built in 1949 for the Woolworth variety store chain. The nomination form for the Loop Retail Historic District notes that the building has excellent integrity and its "overall design, storefront configuration, use of materials, architectural style and craftsmanship are consistent with that of other contributing buildings in the district" (Tatum 1998). The Woolworth Building contributes to the Loop Retail Historic District because of its architectural characteristics.

Lytton Building, 235-243 South State Street *(No. 2 in Table 3.1-1 and on Figure 3.1-1)*

This 18-story steel-frame building on the northeast corner of State Street and Jackson Boulevard is southeast of the Consumers Building, diagonally across South State Street. It has a granite exterior on the lower three floors and terra-cotta on the upper floors. It was built in 1911 and occupied by H.C. Lytton & Sons during the Loop Retail Historic District's period of significance. DePaul University currently occupies it. The Loop Retail Historic District's nomination notes that it has had few alternations other than storefront retail changes and it retains its historic form and details (Tatum 1998). The Lytton Building contributes to the Loop Retail Historic District because of its architectural characteristics.

Benson & Rixon Building, 230 South State Street *(No. 3 in Table 3.1-1 and on Figure 3.1-1)*

This building is on the south side of Quincy Court and is the first building south of the Consumers Building. The 6-story Moderne-style building was built in 1937. Its exterior is brick, terra-cotta, and glass block. Some glass block was removed from the first and second floors, but the building "retains its historic form and detailing and conveys its historic character" (Tatum 1998). The Benson & Rixon Building contributes to the Loop Retail Historic District because of its architectural characteristics.

Stone Building (The Berghoff), 15-23 West Adams Street *(No. 4 in Table 3.1-1 and on Figure 3.1-1)*

This three-story Italianate[7] building, built in 1872, the year after the Chicago fire, is directly west of the Century Building. It is described as a loft building, which was a common building type in the aftermath of the fire before architectural design advancements allowed the taller buildings of the Chicago school. Its third floor was designed to be a public hall, once common throughout Chicago. Public hall buildings are now uncommon, and this building is believed to be the only one remaining in the Loop. The storefronts of The Berghoff were remodeled and an original cornice was removed, but the building "retains its overall form and important details, and conveys its historic character to the observer" (Tatum 1998). The Stone Building contributes to the Loop Retail Historic District because of its architectural characteristics.

[7] Italianate architecture began in England in the 1800s but was inspired by Italian renaissance architecture. Two- or three-story buildings with tall, narrow windows and overhanging eaves are common characteristics of Italianate architecture (Paradis 2023).

Other National Register Historic Districts

In addition to the Loop Retail Historic District, four National Register Historic Districts are within or partially within the APE: the Chicago Federal Center; West Loop–LaSalle Street Historic District; Historic Michigan Boulevard District; and South Loop Printing House District. The South Dearborn Street-Printing House Row North Historic District, an NHL district, is also present within the APE but is discussed with the other NHL properties in a subsequent section.

Chicago Federal Center

The Chicago Federal Center, listed in the National Register in 2011, is entirely within the APE. It is roughly bounded by Dearborn Street on the east, Jackson Boulevard on the south, Clark Street on the west, and Adams Street on the north, with a half-block parcel east of Dearborn Street (refer to Figure 1-1 in Section 1, Purpose and Need). The Chicago Federal Center has three buildings, one structure, one sculpture, and a plaza. The complex and all three buildings were designed by the office of world-renowned architect Ludwig Mies van der Rohe, in association with C.F. Murphy Associates, A. Epstein and Sons, and Schmidt, Garden and Erikson. The three buildings are the Dirksen Courthouse, the John C. Kluczynski Federal Building, and the U.S. Post Office Loop Station. A small building houses mechanical equipment east of the courthouse. The sculpture is known as the Flamingo and sits in the main plaza at the northeast corner of the Kluczynski Federal Building.

The buildings at 202, 214, and 220 South State Street are shielded from portions of the Chicago Federal Center by the Dirksen Courthouse. The Dirksen Courthouse is oriented north-to-south along South Dearborn Street, and separates the Kluczynski Federal Building, U.S. Post Office Loop Station, main plaza, and sculpture from the Century and Consumers Buildings. The mechanical equipment structure and a portion of the plaza referred to as the courthouse plaza are on the east side of the Dirksen Courthouse. The east elevation of the Dirksen Courthouse is adjacent to and faces the west elevations of 202, 214, and 220 South State Street.

The district's period of significance is 1959 to 1974 (Gilbert 2011). Mies van der Rohe (1886 to 1969), the chief designer, was a pioneer of Modern architecture and the last director of the influential Bauhaus school. He used new materials and technology, most notably industrial steel and plate glass, to create austere yet elegant buildings (GSA 2023c). The Chicago Federal Center represented efforts by the federal government to modernize federal buildings in the years following World War II and was pivotal to the endorsement and acceptance of Modern architecture for government buildings throughout the country during the 1960s (GSA 2023c). The following sections describe the buildings within the Chicago Federal Center:

- Everett McKinley Dirksen U.S. Courthouse, at 219 South Dearborn Street, is directly west of the Century and Consumers Buildings. The 30-story rectangular building is oriented north-to-south and is on the east side of Dearborn Street. Mies van der Rohe designed the building between 1959 and 1964. As a result of Mies van der Rohe's principles, the Dirksen Courthouse was a major departure from the traditional image of Federal architecture of the earlier twentieth century (GSA 2023c).
- John C. Kluczynski Federal Building, also known as the Kluczynski Federal Building, is at 230 South Dearborn Street, and directly west of the Dirksen Courthouse. The 44-story rectangular building is oriented east-to-west and is on the west side of Dearborn Street along West Jackson Boulevard. The Kluczynski Federal Building, designed in 1965 and completed in 1974, was also designed by Mies van der Rohe in a style that matches the Dirksen

Courthouse, although the Kluczynski Federal Building is oriented with its lobby on the short ends rather than entering into a central open area like the Dirksen Courthouse (Gilbert 2011).

- U. S. Post Office Loop Station, also known as the Post Office, is at 219 South Clark Street. The U.S. Post Office covers the northwest corner of the complex near the Kluczynski Federal Building. The one-story square building is oriented north-to-south and is on the east side of South Clark Street along West Adams Street. The Post Office was designed in 1965 and completed in 1973. The Post Office's design by Mies van der Rohe echoes the ground floor of the Kluczynski Federal Building and employs common Miesian architectural elements, such as an extended glass wall pane exterior (Gilbert 2011).
- The plaza covers the city block bound by South Dearborn Street on the east, West Jackson Boulevard on the south, South Clark Street on the west, and West Adams Street on the north, as well as the half block on the east side of South Dearborn Street, east of the Dirksen Courthouse. The plaza, paved in gray Rockville granite, flows around all the elements of the Chicago Federal Center. It has three areas – the main plaza and two sub-plazas. The main plaza is on the northeast corner of the block, fronted by the Post Office and Kluczynski Federal Building and contains the Flamingo sculpture. The west sub-plaza is on the west side of the Kluczynski Federal Building, between South Clark Street and the building entry. The east courthouse sub-plaza is on the east side of the courthouse and contains the mechanical equipment structure at its north end. Quincy Court, no longer a through street, terminates in this sub-plaza and historically led to the main entry for the Dirksen Courthouse until the main plaza was completed in the 1970s and the west side became the main entry (Gilbert 2011).
- The east courthouse plaza has a small mechanical equipment building that houses a boiler. This building, which is 60 feet tall by 20 feet long by 60 feet wide, is directly east of the Dirksen Courthouse and is an important feature of the Chicago Federal Center because it creates a barrier between the east courthouse sub-plaza and the adjacent Stone Building (The Berghoff) and it helps define the north end of the plaza (Gilbert 2011).
- The Flamingo is on the main plaza, north of the Kluczynski Federal Building and east of the Post Office. GSA commissioned American artist Alexander Calder to design the Flamingo sculpture. Built in 1973, the 53-foot-tall steel object is a stabile, or freestanding, stationary abstract sculpture.

Historic Michigan Boulevard District

The Historic Michigan Boulevard District, also known as Michigan Avenue, is an eligible National Register historic district that is partially within the APE. It was designated a Chicago Landmark and determined eligible for the National Register in 2002. The 13-block-long district along Michigan Avenue from 11th Street to Randolph Street contains 43 buildings along a segment of Michigan Avenue that fronts onto Grant Park. The district contains an internationally recognized feature, the Michigan Avenue streetwall, which is a one-sided thoroughfare with continuous architectural frontage from early skyscrapers by master architects. The architectural resources were constructed from the 1880s to 1930, and represent significant cultural institutions, clubs, hotels, and office buildings that have contributed to the social, economic, and cultural history of Chicago (City of Chicago 2000, 2022a).

West Loop–LaSalle Street Historic District

The West Loop–LaSalle Street Historic District, also known as West Loop, is a National Register historic district listed in 2013 that is partially within the APE. The district is bounded by Wacker Drive, Wells Street, Van Buren Street, and Clark Street. In 2017, a boundary increase added two buildings at 330 South Wells Street and 212 West Van Buren Street. In total, the district has 50 contributing resources and 13 noncontributing. The district is a commercial area known for its architecture and its place in the history of Chicago from 1873 to 1962. The district represents a variety of architectural styles and technologies that enabled the later construction of taller buildings (Euer et al. 2013).

South Loop Printing House Historic District

The South Loop Printing House Historic District is a National Register district, listed in 1978, that is partially within the APE. The district is roughly bounded by Congress, Polk, State, Taylor, and Wells Streets and includes 27 contributing buildings, of which only 2 are in the APE. The district overlaps with the south end of the South Dearborn Street-Printing House Row Historic District, meaning that both districts include the Manhattan Building and the Plymouth Building. The district is significant for development of the printing industry between 1883 and 1928 (Kershaw 1976). It is recognized for representing "the physical characteristics of an important commercial and industrial district in Chicago when the city was experiencing explosive growth following the consolidation of the railroads as the nation's primary transportation system" (Kershaw 1976); for its urban form showing how industry and architecture responded to a unique set of conditions; and for its "generally homogeneous collection of commercial and industrial buildings, many of a very high level of design" (Kershaw 1976).

National Historic Landmarks

An NHL is a historic property that represents an outstanding aspect of the heritage of the U.S. Eight NHLs are identified within the APE. When an NHL is involved in a federal undertaking, federal agencies must follow specific provisions under Section 106 of the NHPA and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800). Section 110(f) of the NHPA (54 U.S.C. Section 306107) also outlines the specific actions that an agency must take when NHLs may be directly and adversely affected by an undertaking (ACHP 2002). The eight NHL properties in the APE are significant for their architectural characteristics and their contributions to the history of Chicago and American architecture and engineering.

South Dearborn Street-Printing House Row North Historic District

The South Dearborn Street-Printing House Row North Historic District, also known as Printing House Row, is an NHL district listed in 1976. The NHL is at the 300 to 500 blocks of South Dearborn, South Federal, and South Plymouth Streets. The district contains four architecturally significant buildings including the Manhattan Building at 431 South Dearborn Street; the Old Colony Building at 407 South Dearborn Street; the Fisher Building at 343 South Dearborn Street; and the Monadnock Building at 53 West Jackson Boulevard. The buildings are significant examples of late-nineteenth-century early skyscrapers designed by notable architects including William Le Baron Jenney, Holabird and Roche, and Daniel H. Burnham (Pitts 1975c).

Carson, Pirie, Scott & Company Building *(No. 5 in Table 3.1-1 and on Figure 3.1-1)*

The Carson, Pirie, Scott & Company Building, now known as the Sullivan Center, was added to the National Register in 1970 and listed as an NHL in 1975. The building is at 1 State Street. Built in 1899 and expanded in 1903 to 1906, the building was designed by architects Louis Henry Sullivan and Daniel H. Burnham and Company. The building was Sullivan's last major commission as a civic architect (Pitts 1975a).

Leiter II Building *(No. 6 in Table 3.1-1 and on Figure 3.1-1)*

The Leiter II Building, also known as the Sears, Roebuck and Company Building, is an NHL listed in 1976. The building is at 403 South State Street, on the northeast corner of South State Street and Ida B. Wells Drive. Built in 1891, the building was designed by architect William Le Baron Jenney, and is an important early example of skeletal-frame commercial architecture (Pitts 1975b).

Marquette Building *(No. 7 in Table 3.1-1 and on Figure 3.1-1)*

The Marquette Building is an NHL listed in 1973 at 140 South Dearborn Street. Built in 1895, the building was designed by the architects Holabird and Roche and is a significant example of the Chicago school. An additional story was added to the building in the 1950s (Lenger 1973).

Marshall Field & Company Store *(No. 8 in Table 3.1-1 and on Figure 3.1-1)*

The Marshall Field & Company Building, now known as Marcy's State Street, is an NHL listed in 1978 at 111 North State Street. Built in 1892 to 1907, the building was designed by architect Daniel H. Burnham, and is a significant example of the Chicago school (Christian 1977).

Orchestra Hall *(No. 9 in Table 3.1-1 and on Figure 3.1-1)*

Orchestra Hall, also known as Symphony Center, was added to the National Register in 1978, and listed as an NHL in 1994. The building is at 220 South Michigan Avenue. Built in 1904, the Georgian Revival–style building was designed by architect Daniel H. Burnham and is associated with Theodore Thomas and Frederick Stock. In 1907 to 1908, architect Howard Van Doren Shaw designed the club addition (Mesirow 1994).

Reliance Building *(No. 10 in Table 3.1-1 and on Figure 3.1-1)*

The Reliance Building was added to the National Register in 1970 and listed as an NHL in 1976. The building is at 1 West Washington Street. Built in 1890 to 1895, the building was designed by architects John Root and Charles B. Atwood and is an example of the Chicago school (Pitts 1975d).

Rookery Building *(No. 11 in Table 3.1-1 and on Figure 3.1-1)*

The Rookery Building was added to the National Register in 1970 and listed as an NHL in 1975. The building is at 209 South LaSalle Street. Built between1886 and 1888, the building was designed by architects Burnham and Root, with later updates by Frank Lloyd Wright and William Drummond, and is an example from the Chicago school with Moorish, Byzantine, Venetian, and Romanesque elements (Pitts 1975e).

National Historic Route

U.S. Highway 66, commonly called Route 66, is a National Historic Route that spans 2,400 miles across the United States. In Illinois, it connected Chicago with St. Louis, Missouri, in the west. Route 66 was initially developed in 1926 and was decommissioned in 1985 (Seratt and Ryburn-Lamont 1997; National Historic Route 66 Federation 2023). A segment of Route 66 runs through the APE along Jackson Boulevard and Adams Street. The original eastern terminus of Route 66 is at the intersection of Jackson Boulevard and South Michigan Avenue (Pazola 1993). After the c. 1960 conversion of Jackson Boulevard to a one-way street, west-bound traffic along the route was redirected to Adams Street, which became the outbound Route 66 and resulted in a significant alteration of the historic route. The setting of this segment of Route 66 has experienced extensive change and Jackson Boulevard and Adams Street now have the appearance and feeling of modern city streets. The segment of Route 66 in the APE does not appear to meet the registration requirements of the National Register Multiple Property Documentation Form "Historic and Architectural Resources of Route 66 in Illinois" (National Register #64500208) (Seratt and Ryburn-Lamont 1997). It also lacks sufficient integrity to be eligible for the National Register. Therefore, no National Register–eligible segments of historic Route 66 are within the APE.

Historic Properties not within a Historic District

There are 24 properties within the APE that are not within a historic district. Of these 24, 4 are historic properties with previous National Register determinations—one is individually listed, two have previously been determined eligible, and one has previously been determined eligible and also has portions that contribute to a listed historic district. Of the remaining 20 properties, GSA determined that 10 are eligible for the National Register. The properties are within a four-block radius of 202, 214, and 220 South State Street, but none are directly adjacent.

The Chicago Union Loop Elevated Structure (The "L") *(No. 12 in Table 3.1-1 and on Figure 3.1-1)*

The Chicago Union Loop Elevated Structure, colloquially known as the "L," was built in 1897 to replace a former trolley car system. The elevated rail system follows Lake Street, Wabash Avenue, Van Buren Street, and Wells Street, much of which is within the APE. The elevated track provided a central point for existing and planned rail lines and connected Chicago's downtown with many of its outlying neighborhoods. The elevated rail system was determined eligible for the National Register in 1978, and those sections within the Loop Retail Historic District are listed in the National Register as contributing elements to that district.

Chapin & Gore Building *(No. 13 in Table 3.1-1 and on Figure 3.1-1)*

The Chapin & Gore Building at 63 East Adams Street is an early high-rise of the Chicago school designed by Richard E. Schmidt and Hugh M.G. Garden. It was built in 1904 and listed in the National Register in 1979 (National Register of Historic Places #79000823) and is a Chicago Landmark.

Union League Club of Chicago *(No. 14 in Table 3.1-1 and on Figure 3.1-1)*

The Union League Club of Chicago building at 65 West Jackson Boulevard was built in 1925. It is the location of the Union League Club, founded in 1879. It was previously determined eligible for listing in the National Register (SHPO Reference #137049).

27-33 West Jackson Boulevard *(No. 15 in Table 3.1-1 and on Figure 3.1-1)*

27-33 West Jackson Boulevard is a Chicago school mid-rise building constructed circa 1910. It was previously determined eligible for listing in the National Register (SHPO Reference #137047).

Continental Center II *(No. 16 in Table 3.1-1 and on Figure 3.1-1)*

The Continental Center II at 55 East Jackson Boulevard was designated a Chicago Landmark in 2011. It was designed by C.F. Murphy Associates, with co-designers Jacques Brownson and James Ferris, and built in 1961. It is individually eligible for the National Register under Criterion C as a distinctive example of the International style in Chicago and the work of architects C.F. Murphy Associates.

City Club *(No. 17 in Table 3.1-1 and on Figure 3.1-1)*

The City Club (John Marshall Law School) at 315 South Plymouth Court, designed by Pond & Pond, was built circa 1915. It is individually eligible for the National Register under Criterion C as a distinctive example of Late Gothic Revival architecture within the context of the Loop and is identified as Orange in the Chicago Historic Resources Survey (CHRS). Orange properties possess some architectural feature or historical association that makes them potentially significant in the context of the surrounding community.

The Standard Club *(No. 18 in Table 3.1-1 and on Figure 3.1-1)*

The Standard Club at 320 South Plymouth Court was designed by Albert Kahn and built circa 1925. It is individually eligible for the National Register 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. It is identified as Orange in CHRS. Orange properties possess some architectural feature or historical association that make them potentially significant in the context of the surrounding community.

Sears Building *(No. 19 in Table 3.1-1 and on Figure 3.1-1)*

The Sears Building (John Marshall Law School) at 17-23 West Jackson Boulevard was built circa 1925. The architect is unknown. It is individually eligible for the National Register under Criterion C as a representative example of the Chicago school applied to a commercial vernacular building. It is identified as Orange in CHRS. Orange properties possess some architectural feature or historical association that make them potentially significant in the context of the surrounding community.

Mid-Continental Plaza *(No. 20 in Table 3.1-1 and on Figure 3.1-1)*

Mid-Continental Plaza at 55 East Monroe Street is a 49-story high-rise designed by Shaw and Associates, built in 1972. It is individually eligible for the National Register under Criterion C as a distinctive example of post-modern high-rise architecture in Chicago and the work of architectural firm Shaw and Associates.

Big Red *(No. 21 in Table 3.1-1 and on Figure 3.1-1)*

The building known as Big Red (formerly CNA Center, Continental Center III) at 333 South Wabash Street is a 44-story high-rise designed by Graham, Anderson, Probst and White. It was built in 1972. It is individually eligible for the National Register under Criterion C as a distinctive example of the International style in Chicago and the work of architecture firm Graham, Anderson, Probst & White.

Italian Village Restaurant Building *(No. 22 in Table 3.1-1 and on Figure 3.1-1)*

The Italian Village Restaurant building at 71 West Monroe Street was built in 1908, but its current façade likely dates to 1927, when the restaurant opened. Unlike other façades in the Loop, the restaurant's façade displays a stylized Mediterranean motif with a clock tower and exaggerated signage. The overall aesthetic is similar to designs applied to roadside architecture in the early to mid-twentieth century and is a rarity in downtown Chicago. It is individually eligible for the National Register under Criterion C as a rare downtown example of stylized, early-twentieth-century architecture.

Chicago Engineers Club *(No. 23 in Table 3.1-1 and on Figure 3.1-1)*

The Chicago Engineers Club at 314 South Federal Street was constructed in 1912 in the Gothic Revival style. Its narrow stone façade displays Gothic arched entrances and windows, each with intricate tracery. It is individually eligible for the National Register under Criterion C as a distinctive example of Gothic Revival architecture within the Loop.

Xerox Center *(No. 24 in Table 3.1-1 and on Figure 3.1-1)*

The Xerox Center at 55 West Monroe is a postmodern office tower designed by noted Chicago architect Helmut Jahn and constructed from 1977 to 1980. Although it is not yet 50 years old, GSA is considering it eligible for the National Register under Criterion C for purposes of this undertaking because it will likely meet the 50-year threshold by the time the undertaking is completed.

Skidmore, Owings & Merrill Building *(No. 25 in Table 3.1-1 and on Figure 3.1-1)*

The Skidmore, Owings & Merrill Building at 33 West Monroe is a postmodern 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 for the National Register under Criterion C for purposes of this undertaking because it will likely meet the 50-year threshold by the time the undertaking is completed.

3.1.1.4 Archaeological Resources

No archaeological resources have been identified in the archaeological APE. As part of Section 106 consultation, 13 Native American tribes were notified of the undertaking and invited to participate in Section 106 consultation. Forest County Potawatomi Community of Wisconsin and Miami Tribe of Oklahoma replied that no known archaeological resources are within the APE, but both accepted the invitation to be Consulting Parties and requested to remain updated and be notified in the event of an unanticipated discovery (refer to Appendix B, Section 106 Consultation, for a complete list of notified Native American tribes and copies of correspondence received).

3.1.2 Environmental Consequences

This section describes the potential impacts to historic properties within the APE as a result of implementing the Action Alternatives or the No Action Alternative. Because NEPA and NHPA Section 106 are parallel processes that are closely related in their findings of consequences, this section presents the NEPA evaluation of impacts based on the assessment of effects conducted under Section 106 of the NHPA. This section uses the term "impact" when discussing NEPA and the term "effect" when discussing Section 106. Under Section 106, an effect means "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register" (36 CFR Section 800.16(i)).

For the purposes of the NEPA analysis, after historic properties are identified within the APE, the Action Alternatives are analyzed to determine whether they would impact those properties. The following activities may occur as part of the Action Alternatives and were analyzed to determine level of impacts to historic properties:

- Loss of historic properties through demolition
- Alterations to historic properties as a result of viable adaptive reuse
- Physical and visual changes to the setting or other aspects of integrity of historic properties
- Intensity of demolition activities in terms of ground disturbance

Broader indirect impacts, such as changes in land use, were also identified and analyzed. These analyses included activities that are caused by the Action Alternatives but that occur later and farther away. No indirect impacts to historic properties in the APE were identified.

For the purposes of NHPA, after a historic property is identified, the criteria of adverse effect (36 CFR Section 800.5(l)) are applied. These criteria are used to determine whether the undertaking could change the characteristics 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. An effect is adverse under Section 106 if it diminishes the integrity of the property's historically significant characteristics. Examples of adverse effects include, but are not limited to, the following:

- Demolition of the historic property
- Relocation of the historic property
- Introduction of visual, audible, or atmospheric elements that are out of character with the setting of the historic property
- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance

Table 3.1-2 identifies thresholds of NEPA impacts relevant to historic properties for this project and lists the correlation between NEPA impacts and NHPA Section 106 effects. Action Alternatives are analyzed within their applicable context. For example, historic properties with a local level of significance are considered within a local context, whereas historic properties with a national level of significance are considered within a national context (40 CFR Section 1508.27(a)).

The Section 106 consultation process was initiated in October 2022 and the Section 106 agreement document will be signed in August 2024. GSA completed an assessment of effects of the undertaking on historic properties in the APE and determined that the undertaking would have an adverse effect on historic properties. SHPO concurred with GSA's assessment of effects on October 16, 2023, for architectural resources and on November 22, 2023, for archaeological resources, after the Draft EIS was approved. All Section 106 effects findings presented in this document have received SHPO concurrence.

Table 3.1-2. Impact and Effect Thresholds for NEPA and Section 106

Impact Intensity	Description
None or Negligible	Impacts to historic properties, including historic districts, would not be detectable and would not alter resource characteristics. The NHPA Section 106 finding would be no historic properties affected or no adverse effect to historic properties.
Minor	Impacts to historic properties, including historic districts, would result in little, if any, loss of integrity and would be slight but noticeable. Impacts would not appreciably alter resource characteristics. The NHPA Section 106 finding would be no adverse effect to historic properties.
Moderate	Impacts to historic properties, including historic districts, would result in some loss of integrity and would be noticeable. Impacts could appreciably alter resource characteristics. Measures to mitigate impacts would be sufficient to reduce the intensity of impacts to a level less than significant under NEPA. The NHPA Section 106 finding would be no adverse effect, but only after implementing avoidance, minimization, or mitigation measures sufficient to reduce the adverse effects to historic properties.
Significant	Impacts to historic properties, including historic districts, would result in disturbance to an important site, substantial loss of integrity, and/or severe alteration of property condition, the result of which would significantly affect the human environment. Mitigation would not be sufficient to reduce the intensity of impacts to a less-than-significant level under NEPA. The NHPA Section 106 finding would be adverse effect to historic properties. Measures to mitigate, avoid, and/or minimize adverse effects under Section 106 would be decided through consultation and stipulated in a Section 106 agreement document, such as a Memorandum of Agreement or a Programmatic Agreement.
Quality	Beneficial – would have a positive impact to cultural resources. Negative – would have an adverse impact to cultural resources.
Duration	Short-term – would occur only during the implementation period (i.e., demolition, alterations for adaptive reuse) and/or for a limited adjustment period. Long-term – would continue after the implementation period.

3.1.2.1 Alternative A, Demolition

Action Alternative A involves demolishing 202, 214, and 220 South State Street, protecting adjacent buildings, securing the site, and landscaping the vacant site following demolition.

Architectural Resources

The impacts to architectural resources under the Demolition Alternative are discussed in this section. This discussion covers the following resources:

- The Century and Consumers Buildings and 214 South State Street
- The Loop Retail Historic District
- Adjacent contributing buildings within the Loop Retail Historic District
- Other National Register Historic Districts
- NHLs
- Historic properties not within a historic district

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 Programmatic Agreement. However, they are captured in the consultation record and could be revisited through continued consultation if needed. A final draft of the Section 106 Programmatic Agreement is in Appendix B.

Century and Consumers Buildings and 214 South State Street

Under the Demolition Alternative, the Century and Consumers Buildings and 214 South State Street, which are contributing resources to the National Register–listed Loop Retail Historic District, would be demolished. Although mitigation would be implemented, demolishing a historic property cannot be mitigated to a less-than-significant impact because it is a permanent removal of historic fabric. In addition, demolishing the Century Building would lose the opportunity to restore the terra-cotta units of the parapet or reuse the decorative portions of the fire escape. Therefore, impacts to the Century and Consumers Buildings and 214 South State Street would be **negative, significant, and long term** and there would be an adverse effect under Section 106.

Loop Retail Historic District

The Century and Consumers Buildings are within the Loop Retail Historic District, as is 214 South State Street. Of the 109 buildings in the historic district, these are 3 of 75 contributing resources (GSA is considering 214 South State Street as contributing for this undertaking, bringing the total to 75 contributing resources in the historic district). Under the Demolition Alternative, 3 of the 75 contributing resources would be demolished, and 72 contributing resources would remain. This would retain a large collection of properties that are important in the development of commercial and architectural history in Chicago. Removing the Century and Consumers Buildings and 214 South State Street would not impede the ability of the historic district to convey "the history of retail shopping, luxury wholesale trade, professional and personal services, theaters and hotels in Chicago between 1872 and 1949" (Tatum 1998). Removing the Century and Consumers Buildings and 214 South State Street would remove some of the Loop Retail Historic District's character-defining features, and could potentially change the setting of adjacent buildings in the historic district. 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, effects to the Loop Retail Historic District would be adverse under Section 106.

Adjacent Contributing Buildings within the Loop Retail Historic District

Under the Demolition Alternative, adjacent contributing buildings within the Loop Retail Historic District would remain intact, and no physical changes to the buildings' design or materials would occur. These adjacent contributing buildings within the Loop Retail Historic District, including the Woolworth Building (219-221 South State Street), Lytton Building (247 South State Street), Benson & Rixon Building (230 South State Street), and Stone Building, where The Berghoff restaurant is located (15-23 West Adams Street), could experience vibration effects from demolition. Historic buildings may be susceptible to structural damage caused by vibration occurring at nearby properties because their materials and structural systems are older, have experienced greater wear, and may not be as structurally sound as newer construction. Vibration may cause applied terra-cotta ornament, which is common in the Loop Retail Historic District, to crack or fail. The Stone Building, which physically adjoins the Century Building, would be expected to experience the most intense physical effects from demolition. Changes to setting from removing the Century and Consumers Buildings and 214 South State Street would result in visual changes that could potentially affect the integrity of the setting of the surrounding buildings. Therefore, impacts to adjacent contributing buildings within the Loop Retail Historic District would be **negative, moderate, and long term** under NEPA and effects would be adverse under Section 106.

Other National Register Historic Districts

- Chicago Federal Center: Under the Demolition Alternative, the Chicago Federal Center would remain intact, and no physical changes to the materials would occur from demolishing 202, 214, and 220 South State Street. However, the setting, specifically the courthouse plaza, Dirksen Courthouse, and mechanical equipment structure would experience visual changes from the demolition of the buildings. Changes to setting from removing the Century and Consumers Buildings and 214 South State Street would result in visual changes that could affect the integrity of setting and design of the Chicago Federal Center and its contributing resources, particularly given the importance of the setting to Mies van der Rohe's design. The Dirksen Courthouse and mechanical equipment structure could experience vibration effects from demolition. Although not as vulnerable as nineteenth- and early twentieth-century buildings to vibration, the east-facing glass façade of Dirksen could be susceptible to damage from adjacent vibration. The mechanical equipment building would be immediately adjacent to the demolition and could experience damage from vibrations or from heavy equipment. Therefore, impacts to the Chicago Federal Center and its contributing resources would be **negative, moderate, and long term** under NEPA and effects would be adverse under Section 106.
- Historic Michigan Boulevard District, West Loop–LaSalle Street Historic District, and South Loop Printing House Historic District: The Historic Michigan Boulevard District is separated from 202, 214, and 220 South State Street by the intervening block between South State Street and South Wabash Avenue. The West Loop–LaSalle Street Historic District is west of South Dearborn Street, and much of it is visually screened from the buildings at 202, 214, and 220 South State Street by the intervening buildings and structures that would remain intact. The South Loop Printing House Historic District is south of East Van Buren Street and also mostly visually screened from the buildings at 202, 214, and 220 South State Street by the intervening buildings and structures that would remain intact. It is unlikely that these historic districts would experience physical impacts from the demolition due to the distance from the project site and the intervening properties. No physical changes would occur within the historic districts, and their ability to convey their significance would not be affected.

The change to the viewshed from these historic districts from the demolition of the Century and Consumers Buildings and 214 South State Street would be **negative, minor, and long term**, and there would be no adverse effect under Section 106.

National Historic Landmarks

The eight NHL properties identified within the APE (seven buildings and one district: Marshall Field & Company Store; Reliance Building; Carson, Pirie, Scott & Company Building; Marquette Building; Rookery Building; Orchestra Hall; Leiter II Building; and the South Dearborn Street-Printing House Row North Historic District) are mostly shielded from the Century and Consumers Buildings and 214 South State Street by distance and intervening buildings and structures that would remain intact under the Demolition Alternative. It is unlikely that they would experience any physical effects from demolition due to their distance from the project and the intervening properties. Changes to the setting would involve how visual changes from removing the Century and Consumers Buildings and 214 South State Street affect the integrity and significance of these NHL properties. The Marquette Building does have a view of the Century Building. No physical changes would occur to the designs or materials of these NHL properties, and the properties would remain intact. Therefore, impacts to the NHLs within the APE would be **negative, negligible, and long term** under NEPA, and there would be no adverse effect under Section 106.

Historic Properties not within a Historic District

The 14 other historic properties in the APE (the "L"; Chapin & Gore Building; Union League Club of Chicago; 27-33 West Jackson Boulevard; Mid-Continental Plaza; The Standard Club; Sears Building; City Club; Chicago Engineers Club; Italian Village Restaurant building; Continental Center II; Big Red; Xerox Building; and Skidmore, Owings & Merrill Building) are not adjacent to the buildings at 202, 214, and 220 South State Street. Rather, all these properties are separated from the Century and Consumers Buildings and 214 South State Street by distance and intervening buildings and structures that would remain intact. They would not experience any physical changes, and it is unlikely that they would experience physical impacts from demolition due to their distance from the project and the intervening properties. Permanent changes to setting would involve how visual changes from the removal of the Century and Consumers Buildings and 214 South State Street affect the integrity of setting of these other properties, and whether their setting is a character-defining feature for these properties. Further consultation will help determine whether those visual changes cause adverse effects under Section 106. Therefore, impacts to other historic properties within the APE would be **negative, negligible, and long term** under NEPA, and there would be no adverse effect under Section 106.

Archaeological Resources

Ground disturbance would be limited to the demolition of the Century and Consumers Buildings and 214 South State Street within a highly developed, dense, urban environment. No disturbance to undeveloped areas would occur as part of the demolition. In places where buildings would be removed from bedrock, soil would be brought in. After demolition, all areas would be landscaped. The site has been heavily disturbed by previous construction, and there are no known archaeological resources within the archaeological APE. If archaeological resources exist within the APE, they could be affected by demolition if removal of the basements is required. Demolition of the extant buildings in the APE may expose archaeological deposits below or adjacent to the buildings' basements. However, the likelihood that such deposits exist intact in this location is low.

If previously unidentified archaeological resources are discovered during demolition, ground-disturbing activities would halt near the find and GSA would consult with Tribal Historic Preservation Officers, Illinois SHPO, ACHP, and other Consulting Parties, as appropriate, regarding eligibility of the site for listing in the National Register, project impacts, necessary mitigation, or other treatment measures. An unanticipated discovery plan would be in place prior to demolition to address any archaeological resources that might be discovered. Therefore, there would be **no impact** to archaeological resources under NEPA, and no effects to archaeological historic properties under Section 106.

3.1.2.2 Alternative B, Viable Adaptive Reuse

Action Alternative B involves adapting the Century and Consumers Buildings and 214 South State Street for viable reuse. Under the Viable Adaptive Reuse Alternative, GSA would retain ownership of the property. This could involve changes in use of the buildings, exterior alterations, or other changes to the site. These changes would rehabilitate the properties to bring them into use, while upgrading building systems to bring them up to all life safety codes and to meet contemporary and future needs. For example, new windows and new exterior doors could be installed, storefront changes could be made, and new rooftop mechanical equipment would be likely. These potential changes could appreciably alter resource characteristics with some noticeable loss of integrity. Mitigation measures may be necessary to reduce these impacts under NEPA. Although adverse effects under Section 106 are possible from changes made to accommodate viable adaptive reuse options, consultation with the Illinois SHPO, ACHP, and other Consulting Parties would seek to avoid, minimize, and/or mitigate effects on historic properties under Section 106.

Architectural Resources

The impacts to architectural resources under the Viable Adaptive Reuse Alternative are discussed in this section. This discussion covers the following resources:

- The Century and Consumers Buildings and 214 South State Street
- The Loop Retail Historic District
- Other adjacent contributing buildings within the Loop Retail Historic District
- Other National Register Historic Districts
- NHLs
- Historic properties not within a historic district

Century and Consumers Buildings and 214 South State Street

The Century and Consumers Buildings and 214 South State Street would be adapted for viable reuse under the Viable Adaptive Reuse Alternative. The properties would remain in place and return to operable use. It is not anticipated that key character-defining features, such as decorative parapets or terra-cotta cladding or ornamentation, would be removed. The Consumers Building has window openings on the rear (west) and south elevations that may need to be filled in to remove sightlines to the Dirksen Courthouse, in accordance with viable adaptive reuse criterion #6, but the west elevation is not a primary elevation, and architectural solutions could possibly be used to lessen visual changes to the building. The Century Building has no window openings facing the Dirksen Courthouse, so no window removal would be likely. 214 South State Street had windows on the rear (west) elevation that have been filled in, mostly with concrete block; three solid doors, one on each floor, have been added in the original openings. The buildings may be used for new functions. Changes to facilitate those functions could appreciably alter resource characteristics

with some noticeable loss of integrity, such as window replacements or rooftop additions. The ground floor elevations have already experienced alterations, and further alterations associated with viable adaptive reuse are likely to be done in a more historically sensitive design. 214 South State Street could be rehabilitated to return the façade to its 1940s-era appearance. This has the potential for beneficial effects to the buildings and would not diminish the buildings' integrity. Changes would likely occur to building systems commonly rehabilitated, such as life safety, electrical, plumbing, heating, cooling, and ventilation, and to the least publicly visible building elevations. In addition, viable adaptive reuse would rehabilitate the structural and physical integrity of the buildings, including materials, workmanship, and design. It is likely that the terra-cotta cladding for the parapet on the Century Building would be restored as part of any rehabilitation. In addition, the decorative portions of the Century Building's fire escape would also likely be incorporated into the building's rehabilitation. Overall, the buildings' integrity would remain sufficiently intact to convey their significance and would not diminish the properties' ability to contribute to the National Register–listed Loop Retail Historic District. Therefore, there would be a **beneficial, moderate, long-term impact** under NEPA. Although adverse effects under Section 106 are possible from changes made to accommodate viable adaptive reuse options, consultation would seek to minimize those effects to the greatest extent possible.

Loop Retail Historic District

The Viable Adaptive Reuse Alternative would retain and adaptively reuse the Century and Consumers Buildings and 214 South State Street that contribute to the Loop Retail Historic District. Potential changes to the Century and Consumers Buildings and 214 South State Street would be noticeable but would not appreciably alter the National Register–listed Loop Retail Historic District's characteristics. The Century and Consumers Buildings and 214 South State Street would remain contributing resources to the National Register–listed Loop Retail Historic District and be returned to use. 214 South State Street could be rehabilitated to return the façade to its 1940s-era appearance. Key viewsheds within and of the Loop Retail Historic District would not be altered. The historic district would retain sufficient integrity to convey its significance. Therefore, there would be **beneficial, minor, long-term impacts** under NEPA, and no adverse effect under Section 106 to the Loop Retail Historic District.

Adjacent Contributing Buildings within the Loop Retail Historic District

There are historic properties adjacent to 202, 214, and 220 South State Street that contribute to the Loop Retail Historic District, including the Woolworth Building (210-221 South State Street), Lytton Building (247 South State Street), Benson & Rixon Building (230 South State Street), and Stone Building, where The Berghoff restaurant is located (15-23 West Adams Street).

The Viable Adaptive Reuse Alternative would result in changes that would be visible to the adjacent contributing buildings, but these changes are unlikely to affect the setting of the contributing buildings, or the views from or of the buildings. Viable adaptive reuse of the Consumers and Century Buildings and 214 South State Street has the potential to enhance the setting of the adjacent contributing properties by rehabilitating the exteriors and returning the buildings to commerce. The adjacent contributing properties would retain sufficient integrity to convey their significance, resulting in **beneficial, minor, long-term impacts** under NEPA, and no adverse effect under Section 106.

Other National Register Historic Districts

- Chicago Federal Center: The buildings at 202, 214, and 220 South State Street are adjacent to the Chicago Federal Center, although some portions of the Chicago Federal Center are shielded from views of the project site by the Dirksen Courthouse. The Viable Adaptive Reuse Alternative would be noticeable but would not appreciably alter the National Register–listed Chicago Federal Center. The Viable Adaptive Reuse Alternative would result in visible changes to the Century and Consumers Buildings and 214 South State Street adjacent to the Chicago Federal Center, but these changes are unlikely to significantly affect the setting of the Chicago Federal Center or the views from or of the Chicago Federal Center. Viable adaptive reuse of the Consumers and Century Buildings and 214 South State Street has the potential to enhance the setting of the Chicago Federal Center by rehabilitating the exteriors and returning the buildings to commerce, resulting in a potential beneficial effect. The Chicago Federal Center would retain sufficient integrity to convey its significance, resulting in **beneficial, negligible, and long-term impacts** under NEPA, and no adverse effect under Section 106.
- Historic Michigan Boulevard District, West Loop–LaSalle Street Historic District, and South Loop Printing House Historic District: The viable adaptive reuse of the buildings at 202, 214, and 220 South State Street would be noticeable but would not appreciably alter these three historic districts. Viable adaptive reuse would result in visible changes at 202, 214, and 220 South State Street, one-and-a-half blocks from the Historic Michigan Boulevard District and one block from the West Loop–LaSalle Street and South Loop Printing House Historic Districts, but these changes are unlikely to significantly affect the setting of the historic districts or the views from or of the districts. Viable adaptive reuse of the Consumers and Century Buildings and 214 South State Street has the potential to enhance the setting of the historic districts by rehabilitating the exteriors and returning the buildings to commerce, resulting in a potential beneficial effect. The historic districts would retain sufficient integrity to convey their significance, resulting in **beneficial, negligible, long-term impacts** under NEPA, and no adverse effect under Section 106.

National Historic Landmarks

The eight NHL properties are mostly shielded from the project site by distance and intervening buildings and structures that would remain intact. The viable adaptive reuse of 202, 214, and 220 South State Street would likely result in visible changes to the properties, but these changes are unlikely to significantly affect the setting of the eight NHLs or the views from or of them. The Viable Adaptive Reuse Alternative has the potential to enhance the setting of the eight NHLs by rehabilitating the exteriors of the 202, 214, and 220 South State Street properties and returning the buildings to commerce, resulting in a potential beneficial effect to surrounding properties. Additionally, no physical changes would occur to the eight NHL properties' designs or materials; the properties would remain intact and would retain sufficient integrity to convey their significance. Therefore, impacts to the NHLs within the APE would be **beneficial, negligible, and long term** under NEPA, and there would be no adverse effect under Section 106.

Historic Properties not within a Historic District

The 14 other historic properties identified within the APE (the "L"; Chapin & Gore Building; Union League Club of Chicago; 27-33 West Jackson Boulevard; Mid-Continental Plaza; The Standard Club; Sears Building; City Club; Chicago Engineers Club; Italian Village Restaurant building; Continental Center II; Big Red; Xerox Building; and Skidmore, Owings & Merrill Building) are not adjacent to 202, 214, and 220 South State Street. Rather, all these properties are separated

from the Century and Consumers Buildings and 214 South State Street by distance and intervening buildings and structures that would remain intact. They would not experience any physical changes. Viable adaptive reuse of the Consumers and Century Buildings and 214 South State Street would have the potential to enhance the setting of the 13 buildings and the L by rehabilitating the exteriors of 202, 214, and 220 South State Street and returning the buildings to commerce, resulting in a potential beneficial effect to the properties. Changes to setting would be slight and would involve how visual changes that result from the viable adaptive reuse of the Century and Consumers Buildings and 214 South State Street affect the integrity and significance of these 14 properties. The properties would retain sufficient integrity to convey their significance, resulting in **beneficial, negligible, long-term impacts** under NEPA, and no adverse effect under Section 106.

Archaeological Resources

Ground disturbance would be limited to activities associated with common rehabilitation activities within a highly developed, dense, urban environment. No disturbance to undeveloped areas is anticipated. The site has been heavily disturbed from previous construction, and there are no known archaeological resources within the APE. If archaeological resources exist within the APE, they could be affected if a viable adaptive reuse alternative involves removal of basements or foundations. Viable adaptive reuse options that do not remove basements will not affect any archaeological deposits that may be present.

If previously unidentified archaeological resources were discovered during this action, ground-disturbing activities would halt near the find and GSA would consult with the Tribal Historic Preservation Officers, Illinois SHPO, ACHP, and other Consulting Parties, as appropriate, regarding eligibility for listing in the National Register, project impacts, necessary mitigation, or other treatment measures. An unanticipated discovery plan would be in place prior to demolition to address any archaeological resources that might be discovered. Therefore, there would be **no impacts** to archaeological resources under NEPA, and no effects to archaeological historic properties under Section 106.

3.1.2.3 No Action Alternative

Under the No Action Alternative, the Century and Consumers Buildings and 214 South State Street would remain in their current condition, in need of significant repairs, and could continue to deteriorate. GSA would continue to maintain the properties at the current level, and the properties would remain vacant. Maintaining the current condition of the properties would not improve the buildings but could involve alterations (such as stabilization of terra-cotta pieces or removal of deteriorating elements). GSA would continue to have limited federal funds available for maintenance and security of the buildings. There are no archaeological resources in the area, and no ground-disturbing activities would occur; therefore, no archaeological resources would be affected. There would be **negative, moderate, long-term impacts** under NEPA and no adverse effect to historic properties under Section 106.

3.1.3 Mitigation Measures

The draft Section 106 Programmatic Agreement documents the measures to avoid, minimize, or mitigate adverse effects to cultural resources. These measures were discussed and agreed to during the Section 106 consultation process. The Draft Programmatic Agreement is available in Appendix B of this EIS. These stipulations are sufficient to address the necessary mitigation for significant impacts to cultural resources under NEPA. Stipulation IV of the Programmatic

Agreement, entitled "Unanticipated Effects and Post-Agreement Discoveries," addresses the process that would be followed if any archaeological resources are discovered during ground-disturbing activities. The Section 106 Programmatic Agreement is a legally binding document that contains all stipulated mitigation measures that GSA commits to, and it will be attached to and incorporated by reference in the NEPA ROD.

3.2 Aesthetic and Visual Resources

This section describes existing conditions and the potential aesthetic and visual impacts under the Action Alternatives and No Action Alternative. Although no federal, state, or local laws specifically protect aesthetic and visual resources, the importance of maintaining visual characteristics is encouraged in NEPA and the other federal guidance documents (GSA 1999b; NPS 2015; FHWA 2015).

GSA does not have its own guidance on assessing visual impacts. GSA reviewed the available visual impact assessment guidance from the Federal Highway Administration (FHWA), Bureau of Land Management, U.S. Fish and Wildlife Service, and National Research Council. Although this project is not related to highways, FHWA's guidance does assess buildings and presents an analysis framework that is transferable to other types of actions, has been in practice since the 1980s, and has become a widely accepted standard for analysis of aesthetic and visual impacts. GSA found FHWA guidance to be the most applicable. Therefore, GSA's analysis applies concepts from FHWA.

Aesthetic and visual resources character is generally defined as the project site and the surrounding area's visual features and the physical attributes (FHWA 2015). Because the project analyzes two high-rise buildings and one mid-rise building in downtown Chicago, views of these buildings are anticipated to affect viewers along State Street and Adams Street. The scale, form, and materials of each building are described to understand the aesthetic and visual setting, as follows:

- **Scale** – relates to the height, width, and depth of the buildings.
- **Form** – relates to the shape or configuration of the buildings.
- **Materials** – relates to the color, texture, and other artistic attributes of the buildings.

Aesthetic and visual impacts can be defined as changes to the environment (measured by the compatibility of the impact) or to viewers (measured by sensitivity of the impact). When measured together, the compatibility of the impact and the sensitivity of the impact yield the degree of the impact to overall visual character (FWHA 2015). The compatibility of the impact and sensitivity of the impact are described as follows:

- **Compatibility of the Impact** – The ability of the environment to absorb the Action Alternatives and the compatibility of the visual characteristics of the environment. Compatibility is assessed by evaluating changes to scale, form, and materials and the resulting impact to the existing visual character.
- **Sensitivity of the Impact** – The ability of viewers to see and care about the Action Alternatives' impacts. The sensitivity of the impact is based on changes in the character of aesthetic and visual resources. Viewer sensitivity considers factors such as the following:
  - Distance of the viewer.
  - Viewer exposure, which includes closeness to the impact, number of viewers affected, and duration of view.
  - Viewer awareness, which includes attention (or degree of routineness or uniqueness), focal points, and protection (such as scenic designations).

- **Degree of the Impact** – A no/negligible, minor/moderate, or significant change to visual character. The Action Alternatives may benefit visual character by either enhancing aesthetic and visual resources or by creating better views of those resources and improving the experience of visual character by viewers. Similarly, the Action Alternatives may negatively affect aesthetic and visual character by degrading visual resources or obstructing or altering desired views.

This analysis considers aesthetic and visual impacts of the alternatives to *viewers*, not to *historic properties*. Therefore, the requirements of the NHPA, which are used to analyze impacts to historic properties, do not apply to this analysis. Refer to Section 3.1, Cultural Resources, for impacts to historic properties in the context of the NHPA. However, for context reasons related to potential viewer impacts, selected elements of historic properties are explained to outline the aesthetic and visual characteristics of the project site and its surrounding area.

3.2.1 Affected Environment

3.2.1.1 Visual Characteristics of the Project Site

Although not identical and built to different design styles, 202 South State Street and 220 South State Street share similar visual elements, including scale (similar height, width, and depth), form (shape or configuration), and materials (terra-cotta and ornamental features). They exhibit features that are representative of the 1910s, when they were built. Although the smaller building at 214 South State Street was built in the same time frame, there is a stark visual contrast with the much smaller scale, form, and materials of construction. There is a landscaped, fenced lot between 202 and 214 South State Street where 208-212 South State Street used to be. The more visually dominant 202 South State Street and 220 South State Street create "bookends" on this portion of South State Street.

For this aesthetic and visual resources analysis, the north elevations are those portions of the buildings facing north, the south elevations are those portions of the buildings facing south, the east elevations are those portions of the buildings facing east, and the west elevations are those portions of the buildings facing west.

- **202 South State Street (Century Building)** – This office building was constructed in 1915 and is designed in the Commercial style with Late Gothic ornamental details (Tatum 1998). The Commercial style highlights the use of a steel frame instead of masonry or wood frame; steel frames allowed for the construction of modern high-rise buildings in the late nineteenth century and early twentieth century (Tatum 1998). Scale, form, and materials details are as follows:
  - **Scale** – The building is 16 stories tall, its width is approximately 40 feet, and its depth is approximately 100 feet, which is consistent with the other high-rise buildings in the surrounding area.
  - **Form** – The building has dominant vertical lines that draw the view toward the sky on State Street (east elevation) and Adams Street (north elevation). Horizontal lines are also present, but recessed into the building's façade, as are the building's windows, which are outlined in black. There are no dominant lines on the south elevation as seen from South State Street on the bottom floors of the building. However, there is a noticeable but not unique grid-like pattern on the uppermost three floors. There are three noticeable vertical lines on the west elevation as seen from Adams Street, but these lines are unremarkable as they blend in with the building façade and are not visually appealing. All together, these elements have a

moderate degree of visual interest. A pedestrian-scale arcade wraps around South State Street (east elevation) and Adams Street (north elevation) and creates a notable but not unique horizontal line. Vertical pedestrian-scale lighting is visible, with early 1900s-style multiple-bulb lighting on South State Street and modern cobra head-style lighting on Adams Street. This style of lighting is common in downtown Chicago.

- **Materials** – The building is primarily clad with cream-colored terra-cotta, but it has faded to a light gray over time on South State Street (east elevation) and Adams Street (north elevation). Brown rust colors are visible on the northeast corner of the building in a non-uniform manner. The colors on the south and west elevations are a mix of gray, light brown, and cream, with little visual interest due to the simple and non-ornate façade. A multicolored mural wraps around and covers the building's second floor on South State Street (east elevation) and Adams Street (north elevation) with aqua, red, orange, white, and black as the dominant colors. The mural provides a highly noticeable contrast to the cream-gray-colored terra-cotta, and its modern, saturated color scheme and splashy graphics do not fit with the subdued and traditional character of the building. Black paint covering graffiti is visible on the mural, which adds further visual distraction. On State Street, two trees and one planter box provide notable but isolated shades of green and airy, seasonal texture, which add a slight degree of visual interest. The pedestrian-scale light poles are a dark green/dark grayish color. The building's texture is smooth terra-cotta and windows, except for the Late Gothic ornamental details, which have noticeable textural relief on South State Street (east elevation) and Adams Street (north elevation). The Late Gothic ornamental details are visible on each floor of the building, which add a slight degree of visual interest. The recessed windows add a degree of depth and shadow. The south and west elevations also have a smooth texture but no ornamental details. Figures 3.2-1 to 3.2-6 show the exterior of 202 South State Street.

Figure 3.2-1. Picture Taken on Adams Street showing North Elevation/Face of 202 South State Street

Figure 3.2-2. Picture Taken on South State Street showing South Elevation/Face of 202 South State Street (circled)

Figure 3.2-3. Picture Taken on South State Street showing East Elevation/Face of 202 South State Street

Figure 3.2-4. Picture Taken on Adams Street showing West Elevation/Face of 202 South State Street (circled). Fire escape since removed.

Figure 3.2-5. Picture Taken on South State Street showing East Elevation/Face highlighting Late Gothic Ornamental Detail of 202 South State Street

Figure 3.2-6. Picture Taken on Corner of South State Street and Adams Street showing North Elevation/Face highlighting Mural Detail of 202 South State Street

208-212 South State Street: This address is currently a flat, ground-level lot. A three-story building from the early 1920s of an undocumented design formerly occupied this space, but the building was recently demolished due to safety concerns. The building was not historic, and a separate NEPA and NHPA process was undertaken prior to its demolition. Public access is not allowed for safety reasons.

- **Scale** – The flat lot is approximately 30 feet wide and approximately 100 feet deep, which is consistent with other locations in the downtown Chicago where buildings do not currently exist.
- **Form** – While there is no building currently at this location, a 10-foot-tall black-colored anti-climb fence is located on South State Street that viewers are allowed to see through. Behind the fence, the property has been cleared of any building debris and simple ornamental landscaping has been installed that consists of red- and gray-colored rock and a few small green shrubs. Both on-street viewers and elevated viewers are able to see the landscaped lot. These types of fences and landscaping treatments are common throughout the greater Chicago area. Because of this fencing and simple ornamental landscaping, visual interest is low.
- **Materials** – The anti-climb fence is made from galvanized coated steel wire, woven into a zig-zag pattern to create the familiar diamond-shaped design. The green ornamental landscaping on the empty lot provides a slight degree of visual interest. On South State Street, two trees and one planter box provide notable but isolated shades of green and airy, seasonal texture, which also add a slight degree of visual interest.

214 South State Street: This is a loft-style building, which generally means it was built on speculation with flexible spaces meant for rental to multiple commercial tenants (Tatum 1998). It was built in 1886 to 1887 and is Italianate style, which is known for its symmetrical, low-pitched roofs, ornate decorative details, and classical influences. However, "the upper floors are now clad with metal siding, ca. 1960s" (Tatum 1998). Note that only the South State Street side (east elevation and north elevation) is visible. The south elevation is attached to the adjacent building

and hidden from view, while the west elevation is next to the Dirksen Courthouse in an area that is not publicly accessible. Scale, form, and materials details are as follows:

- **Scale** – The building is four stories tall, approximately 15 feet wide, and approximately 150 feet deep, which is consistent with the other low-rise buildings in the surrounding area. Except for the ground floor, the building is windowless, which contributes to a bulky and somewhat imposing presence.
- **Form** – The building has several noticeable horizontal and vertical lines that form a distinct pattern of cubes or squares in low relief on the façade, which is interrupted near the top of the building by a pattern of thin vertical lines. These patterns are unremarkable but add a slight degree of visual interest. The National Park Service noted that "the storefront retains a distinctive storefront from a late 1930s or early 1940s renovation, including a recessed entrance and curved shop windows trimmed with black Carrera glass and silver metal" (Tatum 1998). However, these features are obscured by construction-related scaffolding on South State Street (east elevation), which forms a notable but not unique horizontal line. Vertical pedestrian-scale lighting is visible, with early 1900s-style multiple-bulb lighting on State Street. This style of lighting is commonplace in downtown Chicago.
- **Materials** – The building is dominated by the dark gray/dark brown color of the metal siding. A cream-colored analog clock recessed into the cube pattern provides visual interest and provides a stark contrast to the dark metal siding. The building's texture is smooth metal with cubes or squares on the façade, which add a slight amount of visual interest (Figure 3.2-7).

Figure 3.2-7. Picture Taken on South State Street showing East Elevation/Face of 214 South State Street (circled)

220 South State Street (Consumers Building): This office building was constructed in 1913 and is designed in the Commercial style with Classical Revival details (Tatum 1998). The Commercial style highlights the use of a steel frame instead of masonry or wood frame; steel frames allowed for the construction of modern high-rise buildings in the late nineteenth century and early twentieth century (Tatum 1998). Scale, form, and materials details are as follows:

- **Scale** – The building is 21 stories tall, approximately 60 feet wide, and approximately 150 feet deep, which appears consistent with the other high-rise buildings in the surrounding area.
- **Form** – The building has repeating horizontal and vertical lines that draw the view toward the sky. The building's windows are recessed into the façade and outlined in dark green/gray, similar to 202 South State Street. A fire escape is visible on the building's west elevation and creates a blocky vertical line toward the sky. All together, these lines have a moderate degree of visual interest. Construction-related scaffolding is on South State Street (east elevation) and near the vehicular access space (south elevation) and forms a notable but not unique horizontal line. Vertical pedestrian-scale lighting is visible, with early 1900s-style multiple-bulb lighting on State Street. This style of lighting is common in downtown Chicago. A tan-colored vertical pedestrian-scale subway station entrance provides a slight degree of visual interest.
- **Materials** – The building is primarily clad with white terra-cotta, but it has faded to gray over time. The window frames are dark green/gray colored and contrast with the white/gray terra-cotta, but only a slight degree of visual interest. On South State Street, one planter box provides notable but isolated shades of green and airy, seasonal texture, which adds a slight degree of visual interest. The building's texture is smooth terra-cotta and windows, except for the Classical Revival details, which provide noticeable textural relief. The Classical Revival details seen on three of the four elevations of the building add a slight degree of visual interest. Small diamonds are seen between each row of windows as a part of the Classical Revival details Figures 3.2-8 to 3.2-13 show the exterior of 220 South State Street.

Figure 3.2-8. Picture Taken on Adams Street showing North Elevation/Face of 220 South State Street (circled)

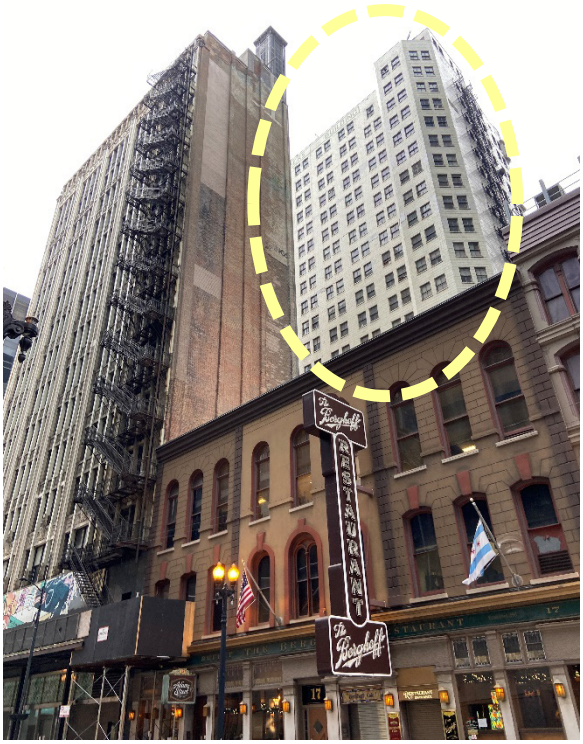


Figure 3.2-9. Picture Taken on South State Street showing South Elevation/Face of 220 South State Street (circled)

Figure 3.2-10. Picture Taken on South State Street showing East Elevation/Face of 220 South State Street

Figure 3.2-11. Picture Taken on Jackson Boulevard showing West Elevation/Face of 220 South State Street (circled)

Figure 3.2-12. Picture Taken on South State Street showing South Elevation/Face highlighting Classical Revival Details of 220 South State Street

Figure 3.2-13. Picture Taken on South State Street showing East Elevation/Face highlighting Classical Revival Details and Subway Entrance of 220 South State Street

3.2.1.2 Surrounding Area Visual Context

The project site is surrounded by low-, mid-, and high-rise buildings, which are the dominant visual features of a highly developed downtown urban setting. The ground floors of the surrounding buildings are mostly retail, whereas the upper stories are mainly for commercial uses. The forms of these buildings range from three stories to over 30 stories. A mix of inharmonious vertical and horizontal lines are generally associated with the buildings in the Loop Retail Historic District, resulting from the various periods of architecture, which include the late 1800s, early 1900s, and post 1940s. Building colors differ but are muted tones of white, cream, gray, red, and brown. Isolated splashes of bolder colors such as red, blue, and green are seen at the pedestrian scale and are typically associated with street banners, building signs, and landscaping. Building textures are moderately different and range from simple loft-style façades with simple ornamental features to early high-rise façades with ornamental terra-cotta features to smooth modernist façades of glass and metal.

South State Street is a multi-lane commercial corridor carrying over 30,000 vehicles per day. It "has a grand urban scale, with large, bulky, full- and half-block, multistory department stores and tall, narrow, 14- to 25-story office and 'tall shops' buildings (often on corner lots), as well as small-scale, low-rise, mid-block buildings. The large department stores and tall, narrow 'skyscrapers' of State Street (although representing only about 43% of State Street frontage) visually dominate the streetscape and create a distinctive streetwall with canyon-like views" (Tatum 1998). The vertical, high-rise buildings draw the eyes up toward the sky in the foreground. In contrast, the mid-rise buildings, the street, lighted streetlamps, street trees, and planter boxes draw the eyes to the background down South State Street. Figure 3.2-14 is from the east side of South State Street, between Adams Street and Monroe Street. Figure 3.2-15 is similar to Figure 3.2-14, and shows that the vertical, high-rise buildings draw the eyes up toward the sky, as does the streetlamp on the left side in the foreground. The lit streetlamps parallel the street, creating a line that draws the eyes into the distance along South State Street.

Figure 3.2-14. Southeast Corner of State Street and Jackson Boulevard looking North

Figure 3.2-15. East Side of State Street, between Adams Street and Monroe Street looking South

Similar to South State Street, Adams Street is a multi-lane commercial corridor. It carries about 4,500 vehicles per day. It also has a grand urban scale with large, bulky, full- and half-block, multistory buildings and smaller-scale, low-rise, mid-block buildings. The high-rise buildings visually dominate the streetscape and create a distinctive streetwall with canyon-like views. The following photograph is from the northeast corner of Adams Street and Dearborn Street. In the foreground, the focus is The Berghoff restaurant. Behind The Berghoff restaurant, soaring high-rise buildings lead the eye skyward (Figure 3.2-16).

Figure 3.2-16. Northeast Corner of Adams Street and Dearborn Street, looking Southeast

3.2.1.3 Viewer Types

Viewers in the surrounding area consist of neighbors and travelers. The neighbor viewer group are people who either work or live in the district. Because most of the buildings in the district are commercial, most people in the neighbor viewer group are full- or part-time workers. The neighbor viewer group would likely have views of 202, 214, and 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. The neighbor viewer group would have the most direct views of the building façades due to their above-ground elevation. The neighbor viewer group would include people in buildings such as 130 South State Street on the north side, 201-205 South State Street (LaSalle Bank – now Bank of America) on the east side, 234-248 South State Street on the south side, and the Dirksen Courthouse on the west side.

The traveler viewer group includes pedestrians, bicyclists, transit riders, and vehicle drivers/passengers. Pedestrians and bicyclists would have the most prolonged view of 202, 214, and 220 South State Street due to their lower speed and ability to pause and absorb the visual characteristics of the buildings. It is reasonable to assume that pedestrians would have a better ability than bicyclists to pause and gaze upon the buildings at 202-220 South State Street. Pedestrians can be separated into commuters on foot who are going to and from work and are common to the area versus tourists who are in the area for personal enjoyment reasons. Transit riders and vehicle drivers/passengers have more fleeting views of 202, 214, and 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. Vehicle drivers would be more focused on the road, whereas transit riders and vehicle passengers would be freer to examine their surroundings. The traveler viewer group would include people on South State Street and Adams Street. Adams Street is part of the Historic Route 66

National Scenic Byway. The original materials used to construct Historic Route 66 on Adams Street have been replaced with modern asphalt. Thus, the original pavement of Historic Route 66 is no longer visible.

Although there are several other National Register properties in the surrounding area, most viewers from these locations to 202, 214, and 220 South State Street have partially or fully obstructed views due to the location of other mid- and high-rise buildings. Similarly, viewers from the South Dearborn Street-Printing House Row North National Historic Landmark District to 202, 214, and 220 South State Street have partially or fully obstructed views due to other mid- and high-rise buildings.

Although there are several green spaces and plazas in the surrounding area, 202, 214, and 220 South State Street are not visible from Millennium Park or Grant Park, which is two blocks east, due to mid- and high-rise buildings blocking the view. Pritzker Park is one block south of the project site at the northwest corner of South State Street and Van Buren Street, and although 202, 214, and 220 South State Street may be partially visible from the sidewalk along South State Street adjacent to Pritzker Park, views from the park are blocked by the University of Illinois at Chicago Law building. Federal Plaza is one block west of 202, 214, and 220 South State Street at the southwest corner of Adams Street and Dearborn Street; views are blocked by the Dirksen Courthouse. The portion of the plaza east of the Dirksen Courthouse is not publicly accessible.

3.2.2 Environmental Consequences

This section evaluates the potential impacts to aesthetic and visual resources under the Action Alternatives and No Action Alternative. Table 3.2-1 presents impact thresholds for aesthetic and visual resources.

Table 3.2-1. Impact Thresholds for Aesthetic and Visual Resources

Impact	Description
None or negligible	The alternative would not result in impacts to aesthetic and visual resources.
Minor to moderate	The alternative would result in changes to aesthetic and visual resources, but would be consistent with the character of the project site.
Significant	The alternative would result in changes to aesthetic and visual resources, but would be inconsistent with the character of the project site.
Quality	Beneficial – would have a positive impact on visual and aesthetic resources. Negative – would have an adverse impact on visual and aesthetic resources.
Duration	Short-term – would occur only during the implementation period (i.e., demolition, alterations for adaptive reuse) and/or for a limited adjustment period. Long-term – would continue after the implementation period.

3.2.2.1 Alternative A, Demolition

Under the Demolition Alternative, the scale, form, and materials of the 16-story, four-story, and 21-story buildings would be removed and replaced with a flat ground-level landscaped plaza. The anti-climb fence currently located at the flat, ground-level landscaped lot at 208-212 South State Street would be removed. This change of scale, form, and materials would result in a highly noticeable compatibility change by all viewer types at the project site, especially for the neighbor viewer group, which has a direct line of sight to the project site area. This viewer group includes 130 South State Street on the north side, 201-205 South State Street (LaSalle Bank – now Bank of America) on the east side, 234-248 South State Street on the south side, and the Dirksen Courthouse on the west side. This group of office workers would be most sensitive to changes due to their closeness to the project site, large number of viewers, long duration of view, and attention, which would be unique because of their ability to see the historic treatments of the existing buildings (i.e., potential focal points) from an elevated position. There would also be a highly noticeable compatibility change for pedestrians and bicyclists of the traveler viewer group due to their lower speed of travel and ability to pause and absorb the visual characteristics of the project site. On the other hand, transit riders and vehicle drivers/passengers in this group would be less affected due to their more fleeting views of the project site and limited field of vision. Although the traveler group would include a large number of viewers, they would have mostly ground-level views, which do not include the historic characteristics of the buildings or any focal points. Therefore, their views are likely routine. For these reasons, this alternative would result in changes to aesthetic and visual resources that would be inconsistent with, and therefore, incompatible with, the character of the project site. Similarly, the sensitivity of the change would be highest for the neighbor viewer group and less so for the traveler viewer group.

Regarding the surrounding area, replacing the scale, form, and materials with a flat, ground-level landscaped plaza would not be uncommon in this form because other flat green spaces and plazas are nearby. These include Millennium Park, Grant Park, Pritzker Park, Federal Plaza, and Daley Plaza. These existing publicly available green spaces/plazas generally have large open spaces, ornamental landscaping, seating, and sometimes public art. The new flat ground-level landscaped plaza is anticipated to result in a minor noticeable compatibility and sensitivity change by all viewer types in the surrounding area. The scale and materials used in this new flat ground-level landscaped plaza have not yet been established, so assessing its impact to the neighbor and traveler viewer groups cannot be determined at this time, but it is expected that this space would be publicly accessible for pedestrian use. The scale and materials would need to comply with the 2022 Consolidated Appropriations Act (Public Law No. 117-103); GSA's *P100 Facilities Standards for the Public Buildings Service* (GSA 2021); *U.S. Courts Design Guide* (Judicial Conference of the United States 2021); and Executive Order 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*. It is also expected the new flat ground-level landscaped plaza would be designed to fit in with the overall visual character of the surrounding area (i.e., Loop Retail Historic District and Dirksen Courthouse). To that end, GSA would coordinate the design of the new flat, ground-level landscaped plaza with the SHPO, City of Chicago, and other Consulting Parties.

For these reasons, this alternative would result in changes to aesthetic and visual resources, but would be consistent with the character of the surrounding area. 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 to aesthetic and visual resources.

3.2.2.2 Alternative B, Viable Adaptive Reuse

The Viable Adaptive Reuse Alternative assumes that the scale, form, and materials of the 16-story, four-story, and 21-story buildings would remain relatively unchanged. As discussed in Section 2.1.2, Alternative B, Viable Adaptive Reuse, GSA would require the installation of security lighting and cameras. Additionally, under the Viable Reuse Alternative, the buildings may be used for new functions. Changes to facilitate those functions, such as window replacement, removing windows (on the west and south elevations of 220 South State Street) or rooftop additions could alter visual and aesthetic resource characteristics that are undetermined at this time and cannot be evaluated but are not anticipated to result in a significant impact. These are nominal exterior modifications that would not change the overall aesthetic and visual character of the project site or surrounding area and would thus be compatible with the existing conditions. Additionally, neither the neighbor viewer group nor the traveler viewer group would be affected because the three buildings would remain largely as they are today.

Viable adaptive reuse would occur in accordance with all local, state, and federal requirements including the 2022 Consolidated Appropriations Act (Public Law No. 117-103); GSA's *P100 Facilities Standards for the Public Buildings Service* (GSA 2021); *U.S. Courts Design Guide* (Judicial Conference of the United States 2021); Executive Order 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*; the Clean Water Act of 1972, as amended; the Clean Air Act of 1970, as amended; and the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Modifications to the interiors of the three buildings would likely occur but would need to comply with GSA guidelines (Appendix D, Agency Correspondence during Draft EIS Preparation). The interior modifications would have no impact to the overall character of the project site or surrounding area or to the neighbor viewer group or traveler viewer group because they would not be visible to people outside the buildings. Thus, the compatibility and sensitivity of this alternative regarding the neighbor viewer group and traveler viewer group would not affect aesthetic and visual resources. For these reasons, the Viable Adaptive Reuse Alternative would result in a **beneficial long-term impact** to aesthetic and visual resources at the project site and in the surrounding area.

3.2.2.3 No Action Alternative

Under the No Action Alternative, the three buildings at 202, 214, and 220 South State Street would remain in place and vacant. The scale, form, materials, and character of the project site and visual context of the surrounding area would remain unchanged. Thus, **no long-term impact** would occur.

3.2.3 Mitigation Measures

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.

Under the Viable Adaptive Reuse Alternative, exterior changes to 202, 214, and 220 South State Street (16-story, 3-story, and 21-story buildings, respectively) would be required to adhere to GSA's and the U.S. Court's design guidelines for safety and security purposes. GSA would also coordinate with the City and other Consulting Parties regarding visual and aesthetic building treatments to the extent feasible.

3.3 Land Use and Zoning

This section describes the existing conditions and the potential land use and zoning impacts under the Action Alternatives and the No Action Alternative.

Land use describes the natural or developed condition of a given parcel of land or area and the types of functions and structures it supports. Examples of land use types include residential, commercial, institutional, and recreational. Assigning land use designations and identifying land use patterns help local governments and other organizations characterize, manage, understand, and organize the functions and relationships of land within their jurisdictions. However, land use designations assigned to properties generally do not establish legal or regulatory requirements for those properties.

Zoning is the legal tool used by local governments to regulate land use and the placement, spacing, and size of buildings. Zoning ordinances administered by local governments identify specific uses that are allowed or prohibited in each zoning district and uses that are compatible but require a special permit or exception to the district's requirements. A primary intent of zoning is to avoid or minimize disruptive land use patterns that may result from creating incompatible land uses.

3.3.1 Affected Environment

3.3.1.1 Land Use

The project site at 202, 214, and 220 South State Street is vacant retail and office space with a landscaped lot in the City's central business district. Figure 3.3-1 shows the current land use of the project site and surrounding area. The majority of the land use surrounding the project site is commercial or institutional (government- and academic-centered activities). Residential land use is primarily south of the project site with some small pockets to the east and north. An office building owned by the federal government is immediately south of the project site, and The Berghoff restaurant is immediately west of the project site. On the east side of State Street, across the street from 202, 214, and 220 South State Street, are office buildings, some of which are occupied and some of which are vacant. Most have street-level retail and offices above.

Local governments develop comprehensive plans to guide future development based on the current and past characteristics of the neighborhoods and communities within their boundaries. Comprehensive plans are generally produced through extensive engagement and collaboration among elected officials, planners, community members, and other stakeholders (for example, business owners, representatives of institutions, or leaders of community organizations). Comprehensive plans present goals, objectives, and other strategies to fulfill a vision of the future of the community.

Three comprehensive plans lay out the City's plan for the project site and adjacent commercial district. The area around the buildings is expected to remain a retail center, as the City looks to promote inclusive growth, increase sustainable resilience, and responsibly invest in the expansion of the built environment (City of Chicago 2022b). The comprehensive plans are summarized as follows:

- The City's *Central Area Action Plan* refers to the Central Loop (which includes the buildings at 202, 214, and 220 South State Street) as "the economic engine" of the Loop, the City, and the entire metropolitan region. The plan calls for high-rise office development west of Dearborn Street (one block west of the project site) and "a vibrant mix of institutional, residential, hotel, entertainment and retail uses" east of Dearborn Street, which includes State Street (City of Chicago 2009).
- The City's *We Will Chicago* (draft) plan is referred to as a "framework plan for the City's future" and establishes goals and objectives to guide Chicago's future for the next decade. Eight pillars are identified, such as economic development; environment, climate, and energy; and community engagement. Each pillar has four to five goals. The plan was adopted by the Chicago Plan Commission in February 2023 (City of Chicago 2023).
- Chicago Metropolitan Agency for Planning (CMAP) is the federally designated metropolitan planning organization for the seven-county metropolitan Chicago region. CMAP's *ON TO 2050* plan identifies three principles: inclusive growth, resilience, and prioritized investment. These principles inform recommendations on community, prosperity, environment, governance, and mobility (CMAP 2022a).

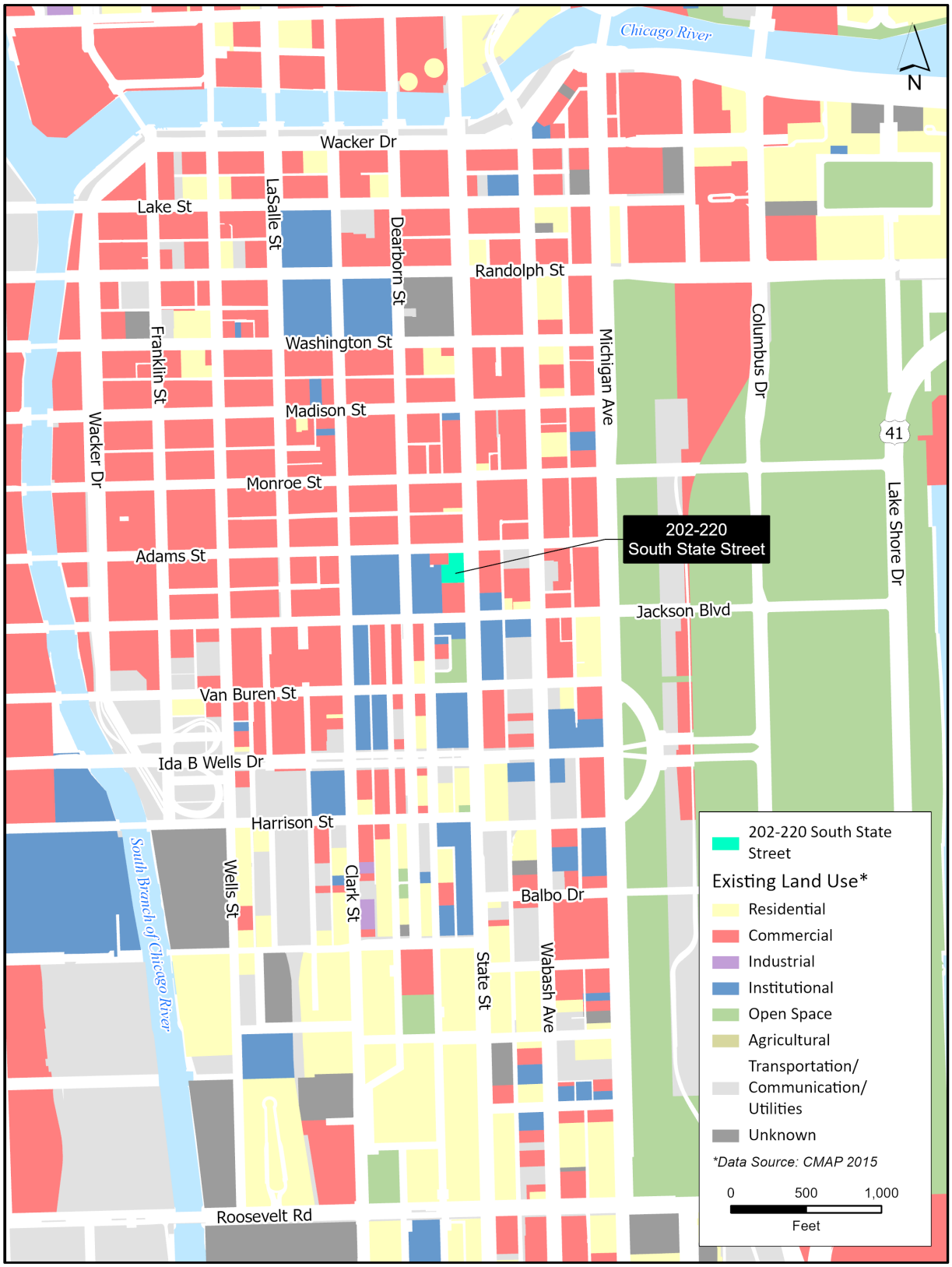
We Will Chicago and *ON TO 2050* are higher-level plans and do not present the land use recommendations that the City's *Central Area Action Plan* does.

The Chicago Loop Alliance, Chicago Loop Alliance Foundation, and Special Service Area #1-2015 developed a plan called Elevate State, which covers State Street from Wacker Drive to Ida B. Wells Drive. Among the plan's recommendations is to strengthen existing anchors, namely arts in the northern part of State Street, retail in the central segment and government and educational in the south segment. The plan recommends retaining the Century and Consumers Buildings (ULI Chicago 2023).

3.3.1.2 Zoning

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. The surrounding area is also highly concentrated with mixed-use and downtown central core zoning designations.

Figure 3.3-1. Current Land Use of Loop



3.3.2 Environmental Consequences

This section describes the potential impacts related to land use and zoning under the Action Alternatives and No Action Alternative. Table 3.3-1 presents impact thresholds for land use and zoning.

Table 3.3-1. Impact Thresholds for Land Use and Zoning

Impact	Description
None or negligible	There would be no changes to land use or zoning.
Minor to moderate	There would be changes to the current land use or zoning, but would be consistent with local comprehensive plans for the area.
Significant	There would be changes to the current land use or zoning because it is inconsistent with local comprehensive plans for the area.
Quality	Beneficial – would have a positive effect on land use and zoning Negative – would have an adverse effect on land use and zoning
Duration	Short-term – would occur only during the construction period. Long-term – would continue after the implementation period.

3.3.2.1 Alternative A, Demolition

Demolishing the three buildings at 202, 214, and 220 South State Street would change the project site land use from three vacant former mixed commercial buildings and one small, landscaped lot to a landscaped parcel. This is not consistent with the City's *Central Area Action Plan*, which calls for continued retail and mixed use. Consistency with *We Will Chicago* and *ON TO 2050* is difficult to gauge because the plans are more aspirational. However, *ON TO 2050* calls for denser, more walkable areas and sustainable building practices. Demolishing 202, 214, and 220 South State Street would not advance those goals. *We Will Chicago* goals include reducing waste and reusing materials. Demolishing the buildings at 202, 214, and 220 South State Street would not advance these goals. The Elevate State plan notes that removing the buildings at 202, 214, and 220 South State Street would be detrimental to a stretch of State Street that is "already struggling" (ULI Chicago 2023).

Demolishing the buildings would change the character of this block by removing two high-rise buildings, and although that would not necessarily change land use of surrounding parcels, it may inhibit plans to reinvigorate the State Street retail corridor. This is discussed more in Section 3.5, Socioeconomics and Environmental Justice.

This 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 vacant site's landscaping in such a way that advances the City's planning goals such as expanding green space.

3.3.2.2 Alternative B, Viable Adaptive Reuse

Land use would not change under the Viable Adaptive Reuse Alternative, and converting the currently vacant buildings at 202, 214, and 220 South State Street to occupied buildings would be in line with local land use plans.

Reuse of the buildings would be generally compatible with City and CMAP plans. However, the *Central Area Action Plan* calls for residential to be part of the mixed-use development in buildings east of Dearborn Street and residential would not be allowed as part of this alternative per the viable adaptative reuse security criteria that prohibits short- and long-term residential use. Therefore, the Viable Adaptive Reuse Alternative would have a **beneficial, significant, long-term impact** to land use.

3.3.2.3 No Action Alternative

Under the No Action Alternative, land use and zoning designations would remain mixed-use commercial properties and have no impact to surrounding land use and zoning. Therefore, land use would not change under the No Action Alternative and there would be **no impact**.

3.3.3 Mitigation Measures

If the Demolition Alternative is selected, GSA would coordinate with the City of Chicago to plan and develop the vacant site's landscaping in such a way that advances the city's planning goals. Stormwater management practices compliant with Section 438 of the Energy Independence and Security Act would be adhered to.

3.4 Community Facilities

Community facilities are buildings or services that support and enhance the community and include police, firefighting, libraries, parks, schools and religious facilities. Not every community contains all of these support networks. There are no regulations that define or guide changes to community facilities.

3.4.1 Affected Environment

3.4.1.1 Community Facilities in the Area

GSA identified community resources using the City of Chicago Data Portal and site visits. Figure 3.4-1 shows community resources near the project site and surrounding area. This discussion focuses on a three-block radius around the three buildings at 202, 214, and 220 South State Street.

Schools

Five universities are near 202, 214, and 220 South State Street: DePaul University Loop Campus, University of Illinois Chicago School of Law, Roosevelt University, Robert Morris University Illinois, and the American Academy of Art College. DePaul University Loop Campus has several buildings on the east side of South State Street and on a multi-block campus southeast of the project site. The University of Illinois Chicago School of Law is one block south of the project site. The Roosevelt University, Robert Morris University Illinois, and the American Academy of Art College are approximately two blocks southeast of the project site. Two school administration offices, the Cristo Rey Network, and the Chicago International Charter School are across the street from the project site.

Libraries

The City of Chicago's Harold Washington Library Center is two blocks south of 202, 214, and 220 South State Street. DePaul University and the University of Illinois Chicago Law School have libraries for their students, but these are not part of the fabric of the community like the Harold Washington Library.

Religious Facilities

The Downtown Islamic Center is on South State Street across from 202, 214, and 220 South State Street. It provides a place for prayers as well as educational programs for children and adults (Chicago Loop Alliance n.d.). Other religious facilities are in the area, including St. Peter's Catholic Church, Church in the Loop, and Loop Church.

Public Parks

Pritzker Park is one block south of the project site. It is approximately 1 acre and has a concession stand, seating, a plaza, and a raised lawn and it is landscaped with ornamental grasses and trees. Grant Park is two blocks east of 202, 214, and 220 South State Street. The 313-acre park is home to the Chicago Art Institute, Shedd Aquarium, and the Field Museum of Natural History (Chicago Park District n.d.).

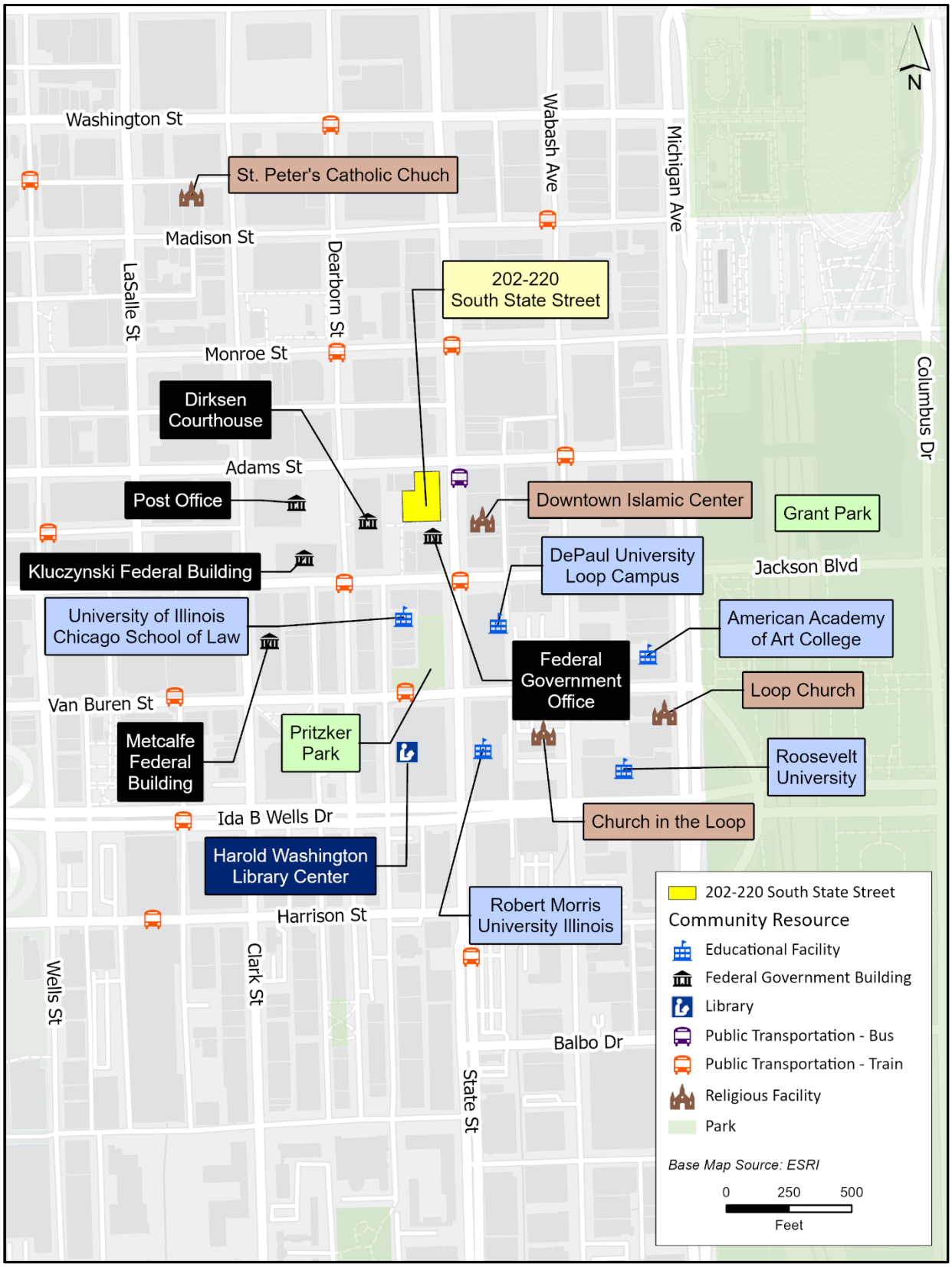
Federal Government Buildings

Five federal office buildings are west and south of the project site. The Dirksen Courthouse is west of 202, 214, and 220 South State Street, which is less than 100 feet away. The Kluczynski Federal Building and the Metcalfe Federal Building are one and two blocks west of the project site, respectively. Another federal office building is on the south side of Quincy Court across from 220 South State Street. A post office is one block west of 202, 214, and 220 South State Street.

Public Transportation

CTA's Red Line "L" train is under State Street. Four stairwells provide access to the Red Line near the project area, with the nearest being directly in front of 220 South State Street in the southbound direction. Bus routes 2, 6, 29, 36, 62, 146 travel past 202, 214, and 220 South State Street and there are several bus stops along South State Street (refer to Figure 3.4-1).

Figure 3.4-1. State Street Properties and Community Facilities



3.4.2 Environmental Consequences

This section evaluates the potential impacts to community facilities under the Action Alternatives and No Action Alternative. Table 3.4-1 presents impact thresholds for community facilities.

Table 3.4-1. Impact Thresholds for Community Facilities

Impact	Description
None or Negligible	There would be no impacts to community facilities, or impacts would be immeasurable.
Minor to Moderate	There would be changes to community facilities but would be consistent with current or future planned uses.
Significant	There would be changes to community facilities that are inconsistent with current or future planned uses.
Quality	Beneficial – would have a positive effect on community facilities. Negative – would have an adverse effect on community facilities.
Duration	Short-term – would occur only during the construction period. Long-term – would continue after the construction period.

3.4.2.1 Alternative A, Demolition

No community facilities would be directly impacted if the buildings at 202, 214, and 220 South State Street were demolished. During demolition, minor, short-term impacts could occur to public transportation systems, such as potential service interruptions or temporary closing of access. Refer to Section 3.11, Transportation and Traffic, for further detail on transportation impacts. Noise generated by demolition may cause short-term disruptions to nearby community facilities such as the Dirksen Courthouse or the Downtown Islamic Center (Masjidway n.d.). Refer to Section 3.9, Noise, for further detail on noise impacts. 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, which consists of a sidewalk with a CTA subway station elevator entrance at the center of the block adjacent to the primary doors. The space would serve as a meeting place for attendees at court proceedings, accommodate press events and other public gatherings relating to such proceedings, and could be integrated with the space created by demolition, providing more convenient public access to the Dirksen Courthouse. The expanded public area so created would also be available to the public for cultural, educational, and recreational uses as provided for under the Public Buildings Cooperative Use Act (40 U.S.C. Section 3306). Given the potential effects from noise and transportation impacts, this alternative would result in **minor or moderate negative, short-term impacts** to nearby community facilities**, with potential minor or moderate beneficial long-term impacts**.

3.4.2.2 Alternative B, Viable Adaptive Reuse

No existing community facilities would be directly impacted under the Viable Adaptive Reuse Alternative. However, there could be beneficial impacts to community facilities, depending on the type of development. Any disruptions from noise and transportation would likely be less than under the Demolition Alternative. This alternative would result in **negative, negligible, short-term impacts** to nearby community facilities and **beneficial, minor, long-term impacts**.

3.4.2.3 No Action Alternative

No community facilities would be impacted under the No Action Alternative.

3.4.3 Mitigation Measures

No mitigation measures are required.

3.5 Socioeconomics and Environmental Justice

This section describes existing conditions and the potential socioeconomic impacts under the Action Alternatives and No Action Alternative. Potential socioeconomic effects include employment, changes in housing, population and other demographics, as well as environmental justice and economic impacts. Appendix F, Socioeconomics Report, provides further details about existing conditions and potential impacts of the alternatives.

3.5.1 Affected Environment

Demographic conditions are described for Cook County and the Chicago Loop. The demographic information is from CMAP's 2022 Community Data Snapshots, which rely on the 2020 Census and 2016–2020 American Community Survey 5-year estimates for the demographic and economic conditions described in this section. The data summarize demographics, housing, income, employment, transportation, land use, revenue, and water data.

3.5.1.1 Population

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 Loop increased by 44.4 percent. In 2020, Cook County had a total of 2,086,940 households and the average household size was 2.5. In the same year, the Chicago Loop had a total of 24,134 households and an average household size of 1.6. There are 15 census block groups within the Loop. Table 3.5-1 presents these general population characteristics for Cook County and the Chicago Loop.

Table 3.5-1. General Population Characteristics for Cook County and the Chicago Loop

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 persons per household	1.6 persons per household
Median Age	37.0 years old	32.6 years old

Source: CMAP 2022b, 2022c

3.5.1.2 Environmental Justice

EPA defines environmental justice as "the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies." The key policy directive behind environmental justice assessment requirements is Executive Order

12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. The executive order requires that federal agencies, to the greatest extent allowed by law, administer and implement programs, policies, and activities that affect human health or the environment to identify and avoid "disproportionately high and adverse" effects on minority and low-income populations.

Other relevant executive orders include Executive Order 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*, which prioritizes environmental justice in tackling climate change, and Executive Order 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All*, which aims to strengthen the Biden administration's "whole-of-government" approach to environmental justice.

The CEQ guidelines suggest that areas with a high concentration of minority populations may be present in areas where the minority population exceeds 50 percent or where the percentage of minority populations is meaningfully greater than the minority population percentage of Cook County. Low-income populations are identified using the percentage of individuals below the poverty threshold compared to the percentage of people below the poverty threshold in Cook County (CEQ 1997a). The CEQ also recommends using EPA's EJScreen tool to screen for low-income and minority populations. The EJScreen results for this analysis are in Appendix E, EJScreen Output.

Race and Ethnicity

In 2020, non-Hispanic Whites comprised the greatest percentage of the population in Cook County (42 percent) and the Loop (59.0 percent). Hispanics were the second largest group in the County (25.3 percent), whereas non-Hispanic Asians were the second largest group in the Loop (21.1 percent). A much larger percentage of Hispanics and non-Hispanic Blacks are in the County (25.3 percent and 22.9 percent, respectively) than in the Chicago Loop (9.6 percent and 7.1 percent, respectively). Overall, 41 percent of people in the Loop identify as a minority, compared to 58 percent within Cook County. Of the 15 census block groups within the Loop, four of the census block groups have a minority population that exceeds the 50 percent threshold and are greater than the minority percentage of Cook County. As shown on Figure 3.5-1, these census block groups are 170318390003, 170318391001, 170313201022, and 170313201011 (EJScreen 2022). Table 3.5-2 breaks down the Cook County and Chicago Loop populations by race and ethnicity.

Table 3.5-2. Race and Ethnicity for Cook County and Chicago Loop

Race and Ethnicity	Cook County Persons	Cook County Percent	Chicago Loop Persons	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	9.5%
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%
Total Minority Population	3,000,533	58.0%	16,143	41.0%

Source: CMAP 2022b, 2022c

Income

In Cook County, 19.2 percent of the population has a household income less than $25,000, whereas 17.9 percent (the third largest group) has a household income of $150,000 or more. (Table 3.5-3). 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 and 30 percent is considered low income (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 3.5-3). 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 Loop lives in poverty and 14 percent is considered low income (U.S. Census Bureau 2020). Of the 15 census block groups within the Loop, none have a higher percentage of population living in poverty compared to Cook County.

Table 3.5-3. Income for Cook County and the Chicago Loop

Economic Indicator	Cook County	Cook County Percent	Chicago Loop	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	Not Applicable	$113,599	Not Applicable
Per Capita Income	$39,239	Not Applicable	$90,269	Not Applicable

Source: CMAP 2022b, 2022c

Figure 3.5-1. Census Block Groups within the Loop with Potential Environmental Justice Communities

3.5.1.3 Economy and Employment

In Cook County, 92.9 percent of persons in the labor force are employed, and 7.0 percent are unemployed (Table 3.5-4). In the Chicago Loop, 94.2 percent of persons in the labor force are employed, and 5.8 percent are unemployed.

The services sector is the largest employment sector in Cook County, and it is an even larger part of the economy in the Chicago Loop (Table 3.5-5). In both Cook County and the Chicago Loop, financial activities is the second largest employment sector.

The services sector also generates the largest earnings in Cook County and the Chicago Loop, making up about half of total industry earnings, followed by the financial activities sector (Table 3.5-5).

Table 3.5-4. Employment Status

Employment Status	Cook County	Cook County Percent	Chicago Loop	Chicago Loop Percent
In Labor Force	2,756,348	66.1	27,122	72.6
Employed*	2,560,882	92.9	25,537	94.2
Unemployed	193,952	7.0	1,564	5.8
Not in Labor Force	1,410,947	33.9	10,240	27.4

Source: CMAP 2022b, 2022c

*Does not include employed population in the Armed Forces.

Table 3.5-5. Employment and Earnings by Industry

Industry Sector	Employment (Full-time Equivalent) Cook County	Employment (Full-time Equivalent) Chicago Loop	Earnings in Millions of Dollars Cook County	Earnings in Millions of Dollars Chicago Loop
Services [a]	1,443,203 (47.0%)	234,278 (63.6%)	$119,797 (44.4%)	$27,841 (52.6%)
Financial Activities [b]	430,396 (14.0%)	88,224 (24.0%)	$41,058 (15.2%)	$19,405 (36.7%)
Government	263,845 (8.6%)	3,321 (0.9%)	$31,755 (11.8%)	$389 (0.7%)
Transportation, Warehousing, and Utilities	240,092 (7.8%)	2,353 (0.6%)	$15,874 (5.9%)	$285 (0.5%)
Retail Trade	222,647 (7.2%)	5,866 (1.6%)	$10,887 (4.0%)	$306 (0.6%)

Industry Sector	Employment (Full-time Equivalent) Cook County	Employment (Full-time Equivalent) Chicago Loop	Earnings in Millions of Dollars Cook County	Earnings in Millions of Dollars Chicago Loop
Manufacturing	180,889 (5.9%)	2,513 (0.7%)	$17,957 (6.7%)	$182 (0.3%)
Construction	117,217 (3.8%)	6,675 (1.8%)	$8,891 (3.3%)	$593 (1.1%)
Wholesale Trade	111,102 (3.6%)	7,179 (2.0%)	$13,414 (5.0%)	$882 (1.7%)
Information	60,102 (2.0%)	17,684 (4.8%)	$10,023 (3.7%)	$3,013 (5.7%)
Mining, quarrying, and oil and gas extraction	1,619 (0.1%)	25 (>0.0%)	$236 (0.1%)	$3 (0.0%)
Agriculture	727 (>0.0%)	16 (>0.0%)	$43 (>0.0%)	$1 (>0.0%)
Total	3,071,839	368,134	$269,936	$52,901

Source: U.S. Department of Commerce Bureau of Economic Affairs 2023a, 2023b

[a] Services sector includes tourism.

[b] Financial Activities sector includes finance and insurance, and real estate and rental and leasing.

3.5.1.4 Heritage Tourism

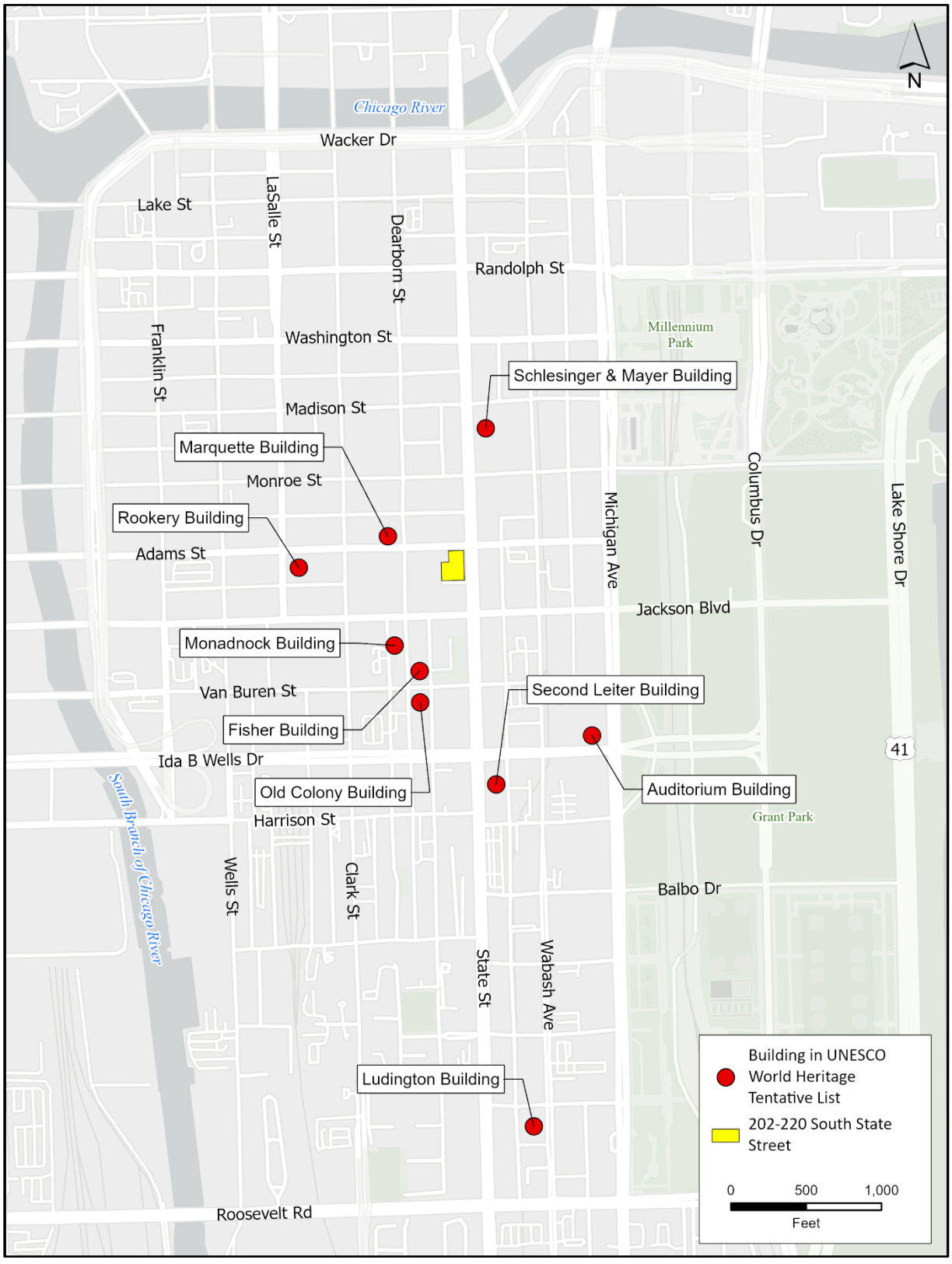
Historic preservation benefits communities for many reasons, including heritage tourism. The National Trust for Historic Preservation defines heritage tourism as "traveling to experience the places, artifacts, and activities that authentically represent the stories and people of the past and present" (ACHP 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, including boat, walking, bus, and "L" train tours, offered nearly 7,000 times per year (Chicago Architecture Center n.d.). These tours brought in approximately $16 million in revenue in 2021 (Chicago Architecture Center 2023b).

In 2017, a preliminary group of nine primarily commercial buildings in the Loop were submitted by the U.S. Department of the Interior to the UNESCO World Heritage Centre's Tentative Lists. 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 at 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 and had 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 Building and Consumers Building (202 and 220 South State Street, respectively) are two examples of Chicago's early skyscrapers and are within four blocks of eight of the nine buildings in the proposal (refer to Figure 3.5-2). A UNESCO World Heritage Site designation could increase heritage tourism in Chicago.

Figure 3.5-2. Buildings in UNESCO World Heritage Tentative List



3.5.2 Environmental Consequences

This section describes the potential impacts related to socioeconomics under the Action Alternatives and No Action Alternative. Table 3.5-6 presents impact thresholds for socioeconomics.

Table 3.5-6. Impact Thresholds for Socioeconomics

Impact	Description
None or negligible	There would be no change to socioeconomic resources or changes would be immeasurable.
Minor	There would be a change to socioeconomic resources, but the change would be of little consequence.
Moderate	There would be some change to socioeconomic resources, and the change would be measurably consequential.
Significant	There would be a substantial change to socioeconomic resources and the change would be measurable and result in a severely negative or major beneficial impact.
Quality	Beneficial – would have a positive effect on socioeconomics. Negative – would have an adverse effect on socioeconomics.
Duration	Short term – would occur only during the implementation period (i.e., demolition, adaptive reuse, and/or for a limited adjustment period). Long term – would continue after the implementation period.

The Impact Analysis for Planning (IMPLAN) model is an economic model commonly used by federal agencies. It was used for this analysis to estimate the direct, indirect, and induced regional economic effects of the Action Alternatives on employment, labor income, and total industry output. Indirect employment effects would include jobs created from the purchase of goods and services by firms involved in demolition or adaptive reuse. Induced employment would include the additional jobs created from construction workers spending their income in Cook County. The IMPLAN model relies on county-level data to describe the local economy in a given year (i.e., 2021) and an online platform that allows users to input more refined and/or accurate data reflecting the regional economy.

In addition, a review of existing literature was performed to qualitatively estimate the economic importance of 202, 214, and 220 South State Street on heritage tourism.

3.5.2.1 Alternative A, Demolition

Economy and Employment

Short-Term Impacts

The $48.8 million cost of demolition would create short-term benefits to the local economy from additional jobs and increased income flows to businesses connected to the construction sector that would be involved in the demolition.

Demolition would occur over an estimated 2-year period and create a total of 210 full-time equivalent (FTE) annual jobs in Cook County. Most of the workers would likely live in Cook County or surrounding counties. Any non-local workers would use temporary housing in Cook County such as hotels. It is unlikely that temporary workers would relocate their families.

The increase in regional employment would be accompanied by increased levels of income and total industry output in Cook County. This outcome is estimated to result in an increase of approximately $11.5 million in total annual labor income and $31.1 million in total annual industry output in Cook County. Table 3.5-7 summarizes the short-term annual economic benefits of the Demolition Alternative.

Table 3.5-7. Regional Economic Benefits in Cook County under the Demolition Alternative

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] IMPLAN's Employee Compensation was used to generate labor income. Employee compensation includes total payroll cost of the employee paid by the employer. It also includes wage and salary plus benefits and payroll taxes.

Assuming only a small percent of the workers performing the demolition come from outside Cook County, changes to employment in Cook County would be minimal and would primarily be in the Construction sector, which had a total employment of about 117,000 in 2020 (refer to Table 3.5-5). The slight increase in employment would not change population and housing in Cook County.

The increase in annual total regional labor income of $11.5 million represents less than 0.01 percent of the total personal income of $207 billion in Cook County in 2020.[8] There would be a **beneficial, minor, short-term impact** to total personal income in Cook County from demolition.

The increase in annual total industry output (or industry earnings), estimated at $31.1 million (in 2020 dollars), represents about 0.01 percent of the total industry output of $270 billion in Cook County in 2020. There would be **beneficial, minor, short-term impact** to total industry output in Cook County from demolition.

The purchase of materials in Cook County required for demolition could increase sales tax revenues, but it would make up only a small percentage of the total sales tax revenue in the County. There would be **beneficial, minor, short-term impact** to Cook County's total sales tax revenues.

[8] The total personal income of Cook County ($207 billion) was derived by multiplying the 2020 per capita income for Cook County ($39,239) by the 2020 total population (5,275,541).

Long-term Impacts

In the long term, if 202, 214, and 220 South State Street were demolished, GSA would save on future maintenance costs. Removing 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).

Heritage Tourism

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 as a heritage tourist attraction. Given the limited direct tourism associated with 202, 214, and 220 South State Street, and the large number of remaining National Register–listed buildings, contributing buildings, and NHLs in the Loop, demolishing 202, 214, and 220 South State Street would be a relatively small direct loss to regional heritage tourism. Thus, there would be a **negative, minor, long-term impact** to heritage tourism in the Loop and Chicago in general.

At the November 2022 scoping meeting, GSA received a comment that demolishing 202 and 220 South State Street could compromise a potential future UNESCO World Heritage Site nomination. While 202 and 220 South State Street 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, they are examples of Chicago's early skyscrapers. 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.

Chicago's architecture tours and heritage tourism are a multi-million-dollar industry. There could be a financial impact of losing the buildings at 202, 214, and 220 South State Street; however, the impact to 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 above, the impact is likely minor given the number of remaining historic buildings and NHLs in the Chicago Loop.

Environmental Justice

Overall, the percentage of minority and low-income populations within the Chicago Loop are less than that of Cook County. Although there are small minority population communities within the Loop, including the census block group where the project site is located (170318391001), any impacts from demolishing the buildings at 202, 214, and 220 South State Street would be borne equally among all groups and not disproportionately on minority populations. Therefore, there would **no impacts** to environmental justice communities under the demolition alternative.

3.5.2.2 Alternative B, Viable Adaptive Reuse

Economy and Employment

Short-Term Impacts

Viable adaptive reuse of 202, 214, and 220 South State Street is estimated to cost $407 million (in 2023 dollars) and assumes a construction schedule of 48 to 54 months.[9] The cost of adaptive reuse would create short-term benefits to the local economy from additional jobs and increased income flows to businesses connected to the construction sector that would be involved in the adaptive reuse.

Depending on the construction period, construction associated with adaptive reuse would create between 610 and 690 annual total FTE jobs within Cook County. Most of the workers would likely live within Cook County, and any non-local workers would use temporary housing in Cook County, such as hotels. Temporary workers are unlikely to relocate their families.

The increase in annual total regional employment would be accompanied by increased levels of income and total industry output within Cook County. This is estimated to result in an increase of about $38.7 million to $43.5 million in annual total labor income and about $133 million to about $150 million in annual total industry output within Cook County. Table 3.5-8 summarizes the short-term economic impact of renovating the buildings for adaptive reuse. Assuming a longer (54-month, or 4.5-year) construction period, there would be a total increase of approximately $174 million to $196 million in total labor income and $600 million to $675 million in total industry output over the 4.5 years.

Table 3.5-8. Regional Economic Impacts in Cook County under the Viable Adaptive Reuse Alternative

Impact Type	Employment (FTEs) [a,b]	Labor Income [a,b,c,d]	Total Industry Output [a,b,c]
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] The first value in the 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.

[9] Cost estimates developed by the Concord Group (2023).

Assuming only a small percent of the workers performing the renovation come from outside Cook County, changes to employment in Cook County would be minimal and would primarily be in the Construction sector, which had a total employment of about 117,000 in 2020 (refer to Table 3.5-5). The slight increase in employment would not cause changes to population and housing in Cook County.

The increase in annual total regional labor incomes of $38.7 to $43.5 million represents about 0.02 percent of the total personal income of Cook County, in 2020, of $207 billion.[10] Therefore, there would be a **beneficial, minor, short-term impact** to total personal income in Cook County from the Viable Adaptive Reuse Alternative.

The increase in annual total industry output (or industry earnings), estimated at about $133 to about $150 million, represents 0.05 percent to 0.06 percent of the total industry output in Cook County, in 2020, of $270 billion. Therefore, there would be a **beneficial, minor, short-term impact** to total industry output in Cook County from the Viable Adaptive Reuse Alternative.

The purchase of materials in Cook County required for adaptive reuse could increase sales tax revenues, but it would likely make up only a small percentage of the total sales tax revenue in the county. Therefore, there would be a **beneficial, minor, short-term impact** to Cook County's total sales tax revenues.

Long-Term Impacts

For analyzing the long-term impacts of the Viable Adaptive Reuse Alternative on the economy, GSA assumed that 202, 214, and 220 South State Street would be adapted for office use. This assumption was made because office use would produce the most revenue from an economic activity standpoint and is allowed by the viable adaptive reuse security criteria. Therefore, it represents the greatest economic benefit of the Viable Adaptive Reuse Alternative and the largest loss of economic opportunity under the Demolition Alternative. If the companies occupying the buildings are new to Cook County, there would be added economic benefits from employment opportunities for Cook County residents as well as multiplier effects that these opportunities represent within Cook County. In addition, there would be an economic benefit to the Chicago Loop from potential new business customers. New workers in 202, 214, and 220 South State Street and potentially new residents 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 (refer to Section 3.3, Land Use and Zoning). There would be a **beneficial, moderate, long-term impact** on Cook County and city economies.

GSA, as a federal entity, does not pay any property tax or make any payments in-lieu of property tax to the City of Chicago or Cook County. However, under an outlease the private developer 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 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. There would be a **beneficial, minor, long-term impact** to the City.

[10] The total personal income of Cook County ($207 billion) was derived by multiplying the 2020 per capita income for Cook County ($39,239) by the 2020 total population (5,275,541).

Heritage Tourism

The adaptive reuse of 202, 214, and 220 South State Street is not anticipated to remove key character-defining features. Given the limited direct tourism associated with 202, 214, and 220 South State Street, adaptive reuse of the buildings would be a relatively small benefit to regional heritage tourism, because the historic structures would remain. Thus, there would be a **beneficial, minor, long-term impact** to heritage tourism in the Loop and Chicago in general.

Environmental Justice

Although there are environmental justice communities within the Loop, any impacts from the adaptive reuse of 202, 214, and 220 South State Street would be borne equally among all groups and not disproportionately on minority populations. Therefore, there would **no impact** to environmental justice communities under the Viable Adaptive Reuse Alternative.

3.5.2.3 No Action Alternative

Economy and Employment

Under the No Action Alternative, GSA would continue to monitor the buildings' condition and secure the buildings. Maintenance costs would likely become increasingly expensive as the buildings sit vacant and continue to deteriorate; for example, removing an external fire escape in 2023 was estimated to cost $2 million. Although no cost estimates are currently available for ongoing operations and/or maintenance of the buildings, it is anticipated that any future needs will be addressed as the needs arise and thus the potential impact of these expenditures on the local economy on any given year would be nominal. Therefore, the fiscal conditions would remain the same and there would be **no impacts** to socioeconomics.

Heritage Tourism

While the individual contribution of the 202, 214, and 220 South State Street buildings 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 impact** to the heritage tourism industry.

Environmental Justice

Under the No Action Alternative, there would be **no impact** to environmental justice communities, either adverse or beneficial.

3.5.3 Mitigation Measures

Because there is no economic activity at 202, 214, and 220 South State Street today, there would be no loss of economic activity. Therefore, there are no identified mitigation measures.

3.6 Greenhouse Gas Emissions

This section describes existing conditions and the potential GHG, climate change, and embodied carbon impacts under the Action Alternatives and No Action Alternative. Climate change is caused in part by human-made and naturally occurring emissions of GHGs released and trapped in the earth's atmosphere. Although GHG levels, surface temperatures, and overall climate conditions have varied for millennia, increases primarily driven by human activity have largely contributed to

recent climatic changes. Human-made emissions are primarily from the use of fossil fuels and other activities. GHGs trap radiant heat reflected from the Earth in the atmosphere, causing the Earth's average surface temperature to rise. The predominant GHGs are carbon dioxide, methane, nitrous oxide, water vapor, and several fluorinated gases, such as hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride. The total GHG emissions are often presented as the carbon dioxide equivalent, or CO_2e, that allows to compare climate effects of all GHG based on their global warming potential.

3.6.1 Affected Environment

3.6.1.1 Greenhouse Gas Emissions

In 2019, the seven-county region produced roughly 112 million tonnes[11] of carbon dioxide equivalent of GHG emissions. Cook County, which includes the City of Chicago, accounted for more than half of the region's total emissions, equating to 55.6 million tonnes of carbon dioxide equivalent. Emissions from the stationary energy sector accounted for the largest portion of the emissions from the region, followed by transportation and waste (CMAP 2022c).

Emissions both regionally and locally are declining. Between 2010 and 2019, northeastern Illinois's regional emissions decreased by 9 percent, or roughly 11 million tonnes of carbon dioxide equivalent. More locally, the City of Chicago saw a 15 percent decrease in emissions, equating to 3.6 million tonnes of carbon dioxide equivalent (CMAP 2022d). Table 3.6-1 displays the emissions summary for the City of Chicago and Cook County based on various emission sources.

Table 3.6-1. Emissions for Cook County and City of Chicago in 2019

Emission Type	Emissions for Cook County including City of Chicago (tonnes of carbon dioxide equivalent)	Emissions for City of Chicago Alone (tonnes of carbon dioxide equivalent)
Residential electricity	5,406,529	2,484,845
Non-residential electricity	13,192,546	6,605,209
Residential natural gas	9,766,824	4,068,847
Non-residential natural gas	10,610,588	5,407,500
On-road transportation	14,224,293	5,106,406
Waste sector	2,401,118	1,009,527
Total	55,601,898	24,682,334

Source: CMAP 2023a, 2023b

[11] This discussion uses metric tonnes (1,000 kilograms) instead of U.S. tons (2,000 pounds). They are similar, but 1 metric tonne equals 1.1 ton.

3.6.1.2 Climate Change

In the U.S., including the Chicago region, climates have warmed in recent decades, and climate models unanimously project that this warming trend will continue. The anticipated change in climate is expected to have many effects on regional environments and economies, mainly resulting from increased extreme weather events, including droughts and flooding.

Illinois has and will continue to experience impacts associated with climate change. Several studies have been performed to determine the potential effects of climate change within the Midwest region and Illinois. The state has warmed about 1 degree Fahrenheit in the last century. Climate change is likely to increase the amount of precipitation and frequency of floods, in addition to an increase in the number of extremely hot days (EPA 2016). Climate change can increase the frequency and intensity of some natural hazards. The Federal Emergency Management Administration's (FEMA's) National Risk Index[12] indicates that Cook County has a very high risk index compared to the rest of the U.S. The very high climate hazards include cold waves, winter weather, heat waves, flooding, and tornadoes, which all have varying impacts from climate change. For this site, flooding poses the greatest potential risk to the assets. That risk may increase over time due to the impacts of climate change.

3.6.2 Environmental Consequences

This section describes the potential impacts from GHG emissions, impacts on climate change, and embodied carbon that could result from implementing the Action Alternatives and No Action Alternative. Table 3.6-4 identifies the impact thresholds for the climate change analysis.

GHG emission calculations followed methodologies from the World Resources Institute (WRI) GHG Protocol Corporate Accounting and Reporting Standard and the WRI GHG Protocol Standard for Project Accounting. GHG emissions from both direct and indirect sources were estimated. Direct sources are those that emit carbon dioxide onsite (e.g., the emissions come out of the tailpipe at the project site). Indirect sources are a result of the project, but the emissions come out of the smokestack or tailpipe at a different location. Specifically, GHG emissions were calculated from commuting, waste transport, waste disposal, fuel combustion, electricity combustion, upstream fuel and energy, and construction materials (embodied carbon). Emissions were quantified for carbon dioxide, methane, and nitrous oxide, which are the primary GHGs. Other reportable GHGs were not applicable to this project assessment. The global warming potential of each pollutant was applied to calculate total carbon dioxide equivalent.

This is a high-level estimate of the GHG impact of the two Action Alternatives based on limited data, best practice assumptions, and subject matter experts' input. Global and regional climate models vary substantially in output and do not have the ability to measure the actual incremental impacts of a specific project on the environment.

Embodied carbon is the amount of carbon emitted during the extraction, production, and transportation of materials used to construct the buildings. Buildings account for at least 39 percent of energy-related global carbon emissions annually (Esau et al. 2021). At least one-quarter of these emissions result from embodied carbon, or the GHG emissions associated with manufacturing, transportation, and installation of building materials. With increasing concerns over climate change, reducing carbon emissions from building construction will be essential (Esau et al. 2021).

[12] The risk index, as it is calculated by FEMA, is based on the expected annual loss from the hazard, the social vulnerability, and is mitigated by community risk.

The majority of a building's embodied carbon is accounted for by the foundation, structure, and envelope; therefore, it typically makes sense to reuse these parts of a building rather than to demolish and construct a new building (Duncan 2019). Although the carbon payback of new construction and retrofits can vary greatly depending on building type, location, climate, and grid mix, retrofitting a building generally saves 50 to 75 percent in embodied carbon emissions compared to constructing a new building (Duncan 2019).

The **climate change** sections for each alternative (3.6.2.1, 3.6.2.2, and 3.6.2.3) explore which hazards are likely to be observed in the Chicago area, and how climate change may affect the likelihood of those events. The change in frequency of natural hazards is based on the high emissions scenario (RCP8.5) assumption, which is the climate change scenario that assumes that a society does not make efforts to reduce GHG emissions or, in other words, maintains "business as usual." Climate risk is the combination of the likelihood of a hazard occurring and the consequence it can have based on the vulnerability and the extent of the potential damage. Where applicable, risk is categorized into low, moderate, and high. Table 3.6-2 summarizes the risk of assessment of climate hazards in Chicago.

Table 3.6-2. Risk Ratings and Likelihood of Climate Hazards in Chicago by Mid-twenty-first Century

Climate Hazard	Current Hazard Risk Ratings [a]	Climate Projections for the Hazards [b]
Cold wave	Very high	Projected to reduce in likelihood (the winter temperature 41.6°F as average high and 29.3°F as average low compared to the baseline 35.2°F as average high 22°F as average low)
Winter weather	Very high	Projected to reduce in likelihood
Heat wave	Very high	Projected to increase in likelihood (64 days of heat index greater than or equal to 90°F and 14 days of heat index greater than or equal to 105°F compared to baseline 21 days of heat index greater than or equal to 90°F and 4 days of heat index greater than or equal to 105°F)
Riverine flooding	Very high	Projected to increase in likelihood (total annual precipitation of 40.6 inches compared to the baseline of total annual precipitation of 37.8 inches)
Tornado	Very high	Impacts of climate change unclear
Ice storm	Relatively high	Impacts of climate change unclear
Strong wind	Relatively high	Impacts of climate change unclear
Hail	Relatively moderate	Impacts of climate change unclear
Hurricane	Relatively low	Impacts of climate change unclear
Drought	Very low	Projected to increase in likelihood (water deficit -7.2 inches compared to the baseline of -1.9-inch water deficit)

Climate Hazard	Current Hazard Risk Ratings [a]	Climate Projections for the Hazards [b]
Wildfire	Very low	Projected to increase (12.3 days per year danger of fire per year compared to the baseline of 4.6 days with extreme danger of fire)

[a] FEMA 2023

[b] Climate Toolbox 2023 with high emissions scenario by 2055 (Frankson et al. 2022)

°F = degree(s) Fahrenheit

In January 2023, the CEQ issued interim guidance to assist federal agencies in analyzing GHG and climate changes effects of their proposed actions under NEPA (CEQ 2023). The guidance provides a multi-step process for analyzing a proposed action's climate change effects under NEPA. The steps include the following:

- Quantifying the reasonably foreseeable GHG emissions (including direct and indirect emissions) of a proposed action, the No Action Alternative, and any reasonable alternatives
- Disclosing and providing context for the GHG emissions and climate impacts associated with a proposed action and alternatives
- Analyzing reasonable alternatives, including those that would reduce GHG emissions relative to baseline conditions, and identifying available mitigation measures to avoid, minimize, or compensate for climate effects

The methods behind those steps are described in detail in the following section.

Assessment Methodology

GHG footprint and impact assessment

GHG emissions were quantified for each alternative consistent with the WRI GHG Protocol for Corporate Accounting and the WRI GHG Protocol for Project Accounting. The boundaries of the analysis included all GHG emissions that are a consequence of the proposed project activity/alternative.

Emissions were quantified for the following GHG pollutants: carbon dioxide, methane, and nitrous oxide. The global warming potential of each pollutant from the Intergovernmental Panel on Climate Change (IPCC) Annual Report 5 was applied to calculate total carbon dioxide equivalent.

Each source was quantified using conservative assumptions and best carbon accounting practices. Limited empirical data were available for this assessment. Most of the data were estimated based on the size of the buildings, the previously referenced demolition study, and previous experience/knowledge of demolition project activities. The results therefore provide a reasonable basis for decision-making but should not be interpreted as precise measurements.

For each of the emissions sources, the amount of GHG emitted was estimated based on the amount of fuel, product, or activity that is expected to be used, and the corresponding emissions factors. Emissions factors are representative values that relate the activity that caused emission with the specific pollutant that is released to the atmosphere. Embodied carbon emissions from fill, concrete, and construction materials (for the Viable Adaptive Reuse Alternative) are also estimated.

The key underlying assumptions in the GHG emissions calculations include the following:

- All emission factors were sourced from EPA, The Climate Registry, ICE database, and the United Kingdom Department for Environment, Food and Rural Affairs. Global Warming Potentials from IPCC Annual Report 5 were applied to convert all quantities from carbon dioxide, methane, and nitrous oxide to carbon dioxide equivalent.
- All construction and demolition staff are assumed to be driving to the work site every working day. The average one-way commuting distance in Chicago was found to be 18.6 miles based on a study from CMAP (2020).
- All waste and recycling materials are assumed to be transported to a construction and demolition waste disposal and recycling facility in Melrose Park, Illinois, for a round-trip distance of 32 miles from the work site as determined by Google Maps driving directions.
- Waste trucks are assumed to be 10-ton roll-off trucks due to their durability on construction sites.
- Total waste quantities were determined from a demolition and renovation study conducted in December 2022 by Jacobs for GSA. Recycled material was conservatively estimated to compose 10 percent of total waste material.
- The durations of all stages of demolition were assumed to be consistent with those in the December 2022 demolition and renovation study. All equipment and vehicles were conservatively assumed to operate for 8 hours per working day for the duration of the applicable demolition stage.
- Equipment types and quantities and construction crew numbers were estimated based on conversations with the lead engineer who prepared the demolition and renovation study. Fuel and electricity consumption rates were determined based on technical information from manufacturers and/or published literature.
- Material quantities were estimated based on the building footprint and resources regarding best practice for paving and landscaping.
- To distinguish carbon dioxide, methane, and nitrous oxide, an emission factor was used to correspond with each individual GHG. For the emissions like waste, embodied carbon, and upstream fuel- and energy-related emissions, the emissions factors are available only on the carbon dioxide equivalent basis, hence the ratio of carbon dioxide, methane, and nitrous oxide was based on assumptions.
- The emissions generated from landfill gas were assumed to be 45 percent carbon dioxide by volume and 55 percent methane by volume; emissions embodied in materials were assumed to be 100 percent carbon dioxide, and upstream fuel- and energy-related generation emissions were assumed to be 100 percent carbon dioxide.

Direct and indirect emissions were classified based on the categories illustrated in Table 3.6-3. The direct and indirect emissions sources were divided based on the geographic and temporal proximity to the project. Based on those criteria, direct emissions included fuel and onsite demolition emissions, whereas indirect emissions included transportation, electricity, supply chain, and materials emissions. Indirect emissions are further classified as upstream of the project site and downstream of the project site. More detail on how emissions were grouped can be found in the Greenhouse Gas Emissions sections for each Action Alternative.

Table 3.6-3. Categories of Direct and Indirect Emissions

Emission Source	Type	Definition
Fuel combustion	Direct	Emissions due to the combustion of fuel in vehicles and equipment onsite
Electricity consumption	Indirect	Emissions due to the generation of electricity at a power plant
Materials for backfill, grading, paving and landscaping, interior construction, and rebuild	Indirect – Upstream	Emissions due to the production and transportation of materials used for backfill, grading, paving and landscaping, interior construction, and rebuild
Upstream fuel- and energy-related activities	Indirect – Upstream	Emissions due to the refining of fuels and transmission and distribution losses of electricity
Employee commuting	Indirect – Upstream	Emissions due to the combustion of fuels in construction and demolition staff's vehicles coming to and from the project site
Waste transport	Indirect – Downstream	Emissions due to the combustion of fuels in vehicles transporting waste from the project site to the contracted waste processing and management facility
Waste disposal	Indirect – Downstream	Emissions due the decomposition of waste in the landfill

Quantification methodologies and emission factors applied for each emissions source are detailed in Appendix G, Greenhouse Gas Emissions Quantification Methodology.

Climate Change Risks

Climate change can increase the frequency and intensity of some natural hazards. This section explored which hazards are likely to be observed in the Chicago area and how climate change may affect the likelihood of those events. The change in frequency of natural hazards is based on the high emissions scenario (RCP8.5) assumption, which is the climate change scenario that assumes a society does not make efforts to reduce GHG emission or maintains "business as usual." It is based on Chicago-specific projections by mid-century (Table 3.6-1) as there are expected operation emissions that will be continuing until 2050s. These hazards are used as the basis for climate risk assessment.

To understand climate risk, each climate hazard is evaluated based on its likelihood to occur and the impact the climate hazard can have on an asset. Furthermore, each asset is assessed for its vulnerability to be impacted by natural hazards. Hence, risk is the combination of the likelihood of a hazard occurring, and the consequence it can have based on the vulnerability and the extent of the potential damage.

The hazards that are characterized in Table 3.6-1 are defined as follows (FEMA 2023):

- Cold wave – a rapid fall in temperature within 24 hours and extreme low temperatures for an extended period.

- Winter weather – winter storm events in which the main types of precipitation are snow, sleet, or freezing rain.
- Heat wave – a period of abnormally hot and uncomfortably hot weather.
- Riverine flooding – when streams and rivers exceed the capacity of their natural or constructed channels to accommodate water flow, and water overflows the banks spilling into adjacent low-lying, dry land.
- Tornado – narrow, violently rotating column of air that extends from the base of a thunderstorm to the ground.
- Ice storm – freezing rain (rain that freezes on surface contact) with significant ice accumulations of 0.25 inches or greater.
- Strong wind – consists of damaging winds, often originating from thunderstorms, that are classified as exceeding 58 mph.
- Hail – a form of precipitation that occurs during thunderstorms when raindrops, in extremely cold areas for the atmosphere, freeze into balls of ice before falling towards the earth's surface.
- Hurricane – a tropical cyclone or localized, low-pressure weather system that has organized thunderstorms but no front (a boundary separating two air masses of different densities) and maximum sustained winds of at least 74 mph.
- Drought – a moisture deficit that can result from reduction in precipitation, a reduction in soil moisture, or a reduction in runoff.
- Wildfire – an unplanned fire burning in natural or wildland areas.

The risk index, as it is calculated by FEMA, is based on the expected annual loss from the hazard, the social vulnerability, and is mitigated by community risk. Those risk ratings correlate with annual frequency and intensity of hazards.

Climate change hazards can affect the assets that are part of the proposed action. Based on the likelihood of occurrence of climate hazards and the potential impact of the climate hazard on the asset, this section highlights the potential climate risk that the asset may experience. The hazards considered in this assessment are limited to natural hazards that may be affected by climate change. Natural hazards are defined as environmental phenomena that have the potential to impact societies and the human environment (FEMA 2023).

The risk of a natural hazard for each asset is based on the likelihood of the climate hazard occurring, the asset vulnerability, and any mitigation strategies that have already been applied or proposed. Some of the hazards are unlikely to pose risk, and that is why they have been marked as low risk. Where applicable, risk is categorized into low, moderate, and high:

- Low – Impacts do not directly alter the asset or its function.
- Moderate – Impacts cause localized direct impact on the asset or its function. The results are minor or with little to no permanent damage.
- High – Impacts cause large, direct impacts on the asset or its function. The results may include permanent and/or heavy damage.

Table 3.6-4 summarizes the impact rating scale for GHG emissions and climate change.

Table 3.6-4. Impact Thresholds for GHG Emissions and Climate Change

Impact	Description
None or negligible	No impacts to climate change from GHG emissions would be expected, or impacts would be unnoticeable or immeasurable.
Minor to moderate	GHG or carbon dioxide equivalent emissions are measurable but would not substantially contribute to climate change.
Significant	GHG or carbon dioxide equivalent emissions are measurable and would contribute to climate change.
Quality	Beneficial – would have a positive effect on climate change. Negative – would have an adverse effect on climate change.
Duration	Short term – Occurs only during the implementation period (i.e., demolition, adaptive reuse, and/or for a limited adjustment period). Long term – continues long after the implementation period.

3.6.2.1 Alternative A, Demolition

Greenhouse Gas Emissions

GHG emissions would occur from demolishing the three buildings at 202, 214, and 220 South State Street (Table 6.5-5). A total of 3,780 tonnes of carbon dioxide is estimated as a result of direct sources, primarily from fuel combustion of construction equipment. Indirect emissions from waste transportation and waste disposal compose the second-most emissions in this alternative for a total of 1,740 tonnes of carbon dioxide. Total direct and indirect emissions from demolition are estimated to be 6,980 tonnes of carbon dioxide. Minimal long-term GHG emissions would occur after demolition because the site would be graded, unlike the other alternative that will entail energy-related emissions during the 25-year lifetime. Overall, demolition would increase Cook County's GHG emissions by roughly 0.01 percent in the short term. There could be some very minor, hard-to-measure sequestration benefit depending on what type of landscaping/greenery is installed (e.g. trees, bushes, shrubs). There would be GHG emission savings from installing greenery versus installing pavement/concrete due to carbon-intensive materials required for concrete. Therefore, GHG emissions would result in **negative, significant, and short-term impacts.**

Table 3.6-5. Projected GHG Emissions under Demolition Alternative

Emission Type	Emission Source	Carbon Dioxide (tonnes)	Methane (tonnes)	Nitrous Oxide (tonnes)
Direct	Fuel Combustion	3,780	0.15	0.03
Direct	*Total*	*3,780*	*0.15*	*0.03*
Indirect	Electricity Consumption	30	0.002	0.0004
Indirect	*Total*	*30*	*0.002*	*0.0004*
Indirect Upstream	Materials for Backfilling, Grading, Landscaping and Paving (Embodied Carbon) [a]	310	0	0
Indirect Upstream	Upstream Fuel-and Energy-Related Activities	880	0.0001	0.00002
Indirect Upstream	Construction Staff Commuting	240	0.007	0.005
Indirect Upstream	*Total*	*1,430*	*0.007*	*0.005*
Indirect Downstream	Waste Transport	480	0.003	0.015
Indirect Downstream	Waste Disposal[b]	1,260	20	0
Indirect Downstream	*Total*	*1,740*	*20*	*0.015*
Indirect	*Total*	*3,200*	*20*	*0.02*
Direct and Indirect	Total	6,980	20	0.05

[a] Only carbon dioxide equivalent emission intensities were available for embodied carbon calculations, assumed to be 100 percent carbon dioxide for estimation purposes.

[b] Carbon dioxide and methane are assumed as the major greenhouse gases from waste disposal, no nitrous oxide data were available for waste disposal.

Climate Change

There would be a **negative, negligible, and short-term impact** to climate risk to the buildings during demolition due to high wind or rain that could move asbestos-containing material (ACM) away from the project site (Table 3.6-6).

Table 3.6-6. Potential Climate Risk Ratings for Chicago-specific Climate Hazards under the Demolition Alternative

Asset Type	Cold Wave and Winter Weather (High Hazard Likelihood)	Heat Wave (Very High Hazard Likelihood)	Flooding (Very High Hazard Likelihood)	Tornado, Strong Wind, Hurricane (Relatively Low To Very High Hazard Likelihood)	Ice Storm, Hail (Moderate-High Hazard Likelihood)	Drought and Wildfire (Low Hazard Likelihood)
1. Demolition Waste Including Hazardous Materials	Low risk	Low risk	Low risk	Medium risk	Low risk	Low risk
2. Basement Water Containment	Low risk	Low risk	Medium risk	Low risk	Low risk	Low risk
3. Landscaped Public Space	Low risk	Low risk	Low risk	Low risk	Low risk	Low risk
4. Public Space Visitors	Low risk	Low risk	Low risk	Low risk	Low risk	Low risk

Embodied Carbon

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 constructed, 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 the embodied carbon for the demolition alternative would be negligible. However, to provide context and a reasonable comparison to the emissions from the demolition and the viable adaptive reuse alternatives, GSA calculated a high-level estimate of the embodied carbon of the buildings at 202, 214, and 220 South State Street using the Carbon Avoided: Retrofit Estimator (CARE) Tool (CARE Tool 2023). Note that these estimates are *not* a result of the project activity, but rather emissions that occurred when the building was constructed or emissions that would occur if a new building were to be constructed. These emissions are not a result of the project activity for this alternative. The CARE Tool is a web-based calculator for estimating and comparing the embodied, operating, and avoided carbon impacts and benefits of reusing and upgrading existing buildings or replacing them with new construction. Embodied carbon is typically calculated for new buildings for which more information is known about the construction materials. Calculating embodied carbon of existing buildings is more challenging due to more limited information; therefore, the values generated by the CARE Tool are a high-level approximation.

To calculate the embodied carbon of each building, the CARE Tool considers the following:

- Total square footage
  - 202 South State Street: 75,316 square feet
  - 214 South State Street: 10,800 square feet
  - 220 South State Street: 248,525 square feet
- Number of floors above and below grade
  - 202 South State Street: 15 floors above grade, 2 floors below grade
  - 214 South State Street: 4 floors above grade, 0 floors below grade
  - 220 South State Street: 22 floors above grade, 3 floors below grade
- Building use
  - Office
- Structural system
  - Steel and/or concrete

According to the CARE Tool, the embodied carbon of 202 South State Street is 3,500 tonnes of carbon dioxide equivalent, the equivalent of carbon sequestered by 4,200 acres of forest in 1 year if the building were constructed today. The embodied carbon of 220 South State Street is 11,500 tonnes of carbon dioxide equivalent, the equivalent of carbon sequestered by 13,800 acres of forests in 1 year. The embodied carbon of 214 South State Street is 500 tonnes of carbon dioxide equivalent, the equivalent of carbon sequestered by 600 acres of forest in 1 year.

Embodied carbon emissions due to backfill material and limited concrete were included in the GHG assessment for the project activities in the Demolition Alternative. The impact is estimated at 300 tonnes carbon dioxide, out of a total of more than 7,000 tonnes of carbon dioxide for all sources. This is less than 5 percent and therefore not material. Because 5 percent is the materiality threshold most often used in GHG inventories to assess the significance of a source's contribution to the inventory total, any/all sources less than 5 percent were reasonably considered to have minimal impact. Demolishing the buildings at 202, 214, and 220 South State Street would have a **negative, negligible, short-term impact** on embodied carbon.

3.6.2.2 Alternative B, Viable Adaptive Reuse

Greenhouse Gas Emissions

GHG emissions would occur from the viable adaptive reuse of the three buildings at 202, 214, and 220 South State Street. Emissions were separately quantified both for the construction/ rebuild activity (Activity) and for the lifetime operational and commuting emissions (Lifetime) that would result from the continued life of the building. For purposes of this study, GSA assumed that the building life would be an additional 25 years following rebuild, due to the old age of the buildings. This alternative assumes that only interior renovations will be carried out, without structural changes. For the construction period, total emissions are estimated at 8,050 tonnes of carbon dioxide, primarily embodied carbon emissions for the rebuild construction materials, which are estimated to be 4,420 tonnes of carbon dioxide. As shown in Table 3.6-7, other significant sources during the construction period include fuel combustion (1,270 tonnes carbon dioxide), electricity consumption (780 tonnes carbon dioxide), and waste transport/disposal (630 tonnes carbon dioxide). Long-term operational emissions would be

71,600 tonnes of carbon dioxide through 2050, primarily anticipated electricity consumption (41,160 tonnes carbon dioxide) and natural gas fuel consumption (12,970 tonnes carbon dioxide). This equates to 2,910 tons of carbon dioxide equivalent annually for 25 years. Overall, viable adaptive reuse of the three buildings would increase Cook County's GHG emissions by roughly 0.015 percent in the short term, and nearly zero over the long term. Therefore, GHG emissions would result in **negative, significant, short-term impacts** and **negative, minor, long-term impacts**.

Table 3.6-7. Projected GHG Emissions under Viable Adaptive Reuse Alternative

Emission Type	Emission Source	Carbon Dioxide (tonnes)	Methane (tonnes)	Nitrous Oxide (tonnes)
Direct	Fuel Combustion (Activity)	1,270	0.04	0.007
Direct	Fuel Combustion (Lifetime)	12,970	0.25	0.02
Direct	*Total Fuel Combustion*	*14,240*	*0.29*	*0.027*
Indirect Electricity	Electricity Consumption (Activity)	780	0.07	0.01
Indirect Electricity	Electricity Consumption (Lifetime)	41,160	3.74	0.55
Indirect Electricity	*Total*	*41,800*	*3.81*	*0.56*
Indirect Upstream	Construction Material Embodied Carbon (Activity)	4,420	0	0
Indirect Upstream	Upstream Fuel and Energy Related Activities (Activity)	780	0.0067	0.0067
Indirect Upstream	Upstream Fuel and Energy Related Activities (Lifetime)	14,620	0.176	0.033
Indirect Upstream	Construction Worker Commuting (Activity)	170	0.006	0.003
Indirect Upstream	Building Worker Commuting (Lifetime)	590	0.009	0.001
Indirect Upstream	*Total Indirect Upstream (Activity)*	*5,370*	*0.0127*	*0.0097*
Indirect Upstream	*Total Indirect Upstream (Lifetime)*	*15,210*	*0.185*	*0.034*
Indirect Upstream	*Total*	*20,580*	*0.0198*	*0.044*
Indirect Downstream	Waste Transport (Activity)	160	0.001	0.005
Indirect Downstream	Waste Transport (Lifetime)	30	0.0002	0.0008
Indirect Downstream	Waste Disposal (Activity)	470	6.8	0

Emission Type	Emission Source	Carbon Dioxide (tonnes)	Methane (tonnes)	Nitrous Oxide (tonnes)
Indirect Downstream	Waste Disposal (Lifetime)	2,230	32.28	0
Indirect Downstream	*Total (Activity)*	*630*	*6.801*	*0.005*
Indirect Downstream	*Total (Lifetime)*	*2,260*	*32.28*	*0.0008*
Indirect Downstream	***Total***	***2,890***	***39.10***	***0.0058***
Indirect	*Total (Activity)*	*6,780*	*6.88*	*0.025*
Indirect	*Total (Lifetime)*	*58,630*	*36.21*	*0.585*
Indirect	***Total***	***65,410***	***43.1***	***0.61***
Direct and Indirect	*Total (Activity)*	*8,050*	*6.92*	*0.03*
Direct and Indirect	*Total (Lifetime)*	*71,600*	*36.46*	*0.59*
All Emissions	TOTAL	79,650	43.38	0.64

Climate Change

The three buildings could face risks from climate change, including natural hazards, from the Viable Adaptive Reuse Alternative (Table 3.6-8). Extreme heat and flooding pose the greatest risk to the buildings based on Chicago's Climate Action Plan (City of Chicago 2022c). Cold waves, winter weather, and tornados pose a medium risk. Overall, climate risk poses a **negative, negligible, long-term impact** on the buildings.

Table 3.6-8. Potential Climate Risk Ratings for Chicago-specific Climate Hazards under Viable Adaptive Reuse Alternative

Asset Type	Cold Wave and Winter Weather (High Hazard Likelihood)	Heat Wave (Very High Hazard Likelihood)	Flooding (Very High Hazard Likelihood)	Tornado, Strong Wind, Hurricane (Relatively Low To Very High Hazard Likelihood)	Ice Storm, Hail (Moderate-High Hazard Likelihood)	Drought and Wildfire (Low Hazard Likelihood)
1. Physical Asset	Low risk	Low risk	Medium risk	Low risk	Low risk	Low risk
2. Water and Steam Utilities	Medium risk	Low risk	High risk	Low risk	Low risk	Low risk
3. Mechanical, Plumbing, HVAC Systems	Medium risk	Low risk	Low risk	Medium risk	Low risk	Low risk
4. Energy System	Medium risk	Medium risk	High risk	Low risk	Low risk	Low risk
5. Electrical Utility Vault	Low risk	Low risk	High risk	Low risk	Low risk	Low risk
6. Fire Suppression System	Low risk	High risk	Low risk	Low risk	Low risk	High risk
7. Building Users	Low risk	Medium risk	Low risk	Low risk	Low risk	Low risk

HVAC = heating, ventilation, and air conditioning

Embodied Carbon

Renovating the buildings at 202, 214, and 220 South State Street would result in some embodied carbon emissions because there would be some changes to the buildings' elements (mostly interior), but the embodied carbon emitted would be substantially less than that emitted if new buildings were constructed under the Demolition Alternative. As noted above, the majority of a building's embodied carbon is accounted for by the foundation, structure, and envelope; the Viable Adaptive Reuse Alternative would maintain these aspects of the three buildings.

According to the CARE Tool, adaptive reuse of 202 South State Street would emit 1,100 tonnes of carbon dioxide equivalent; adaptive reuse of 220 South State Street would emit 3,500 tonnes of carbon dioxide equivalent; and adaptive reuse of 214 South State Street would emit 200 tonnes of carbon dioxide equivalent.

To calculate the embodied carbon of reusing each building, the CARE Tool considers the following:

- Existing building characteristics (total square footage, number of floors above and below grade)
- Building use (i.e., office)
- Type of structure (i.e., steel)
- Extent of structural reinforcement or replacement
  - GSA assumed 0 percent.
- Extent of envelope reuse
  - GSA assumed minor improvements to exterior walls (clean, seal, and coat for 214 South State Street and 50 percent masonry repair/repointing for 202 and 220 South State Street).
  - GSA assumed medium improvements to windows/glazing (reglaze frames).
  - GSA assumed minor improvements to roofing (restore/repair).
- Extent of interior reuse
  - GSA assumed 0 percent for restoration/refurbishment of finishes.
  - GSA assumed 100 percent for new finishes.
  - GSA assumed 100 percent for rebuilding/reconfiguration.
- Mechanical, electrical, and plumbing systems reuse
  - GSA assumed major improvements (replace all systems with high-performance mechanical, electrical, and plumbing systems).

While the Viable Adaptive Reuse options are limited due to security concerns associated with the adjacent Dirksen Courthouse, this alternative could serve a needed purpose that might otherwise require constructing a new building elsewhere. Therefore, reusing the 202, 214, and 220 South State Street buildings would save the embodied carbon required to construct a new building.

Viable Adaptive Reuse would still require energy to remove, process, and dispose of waste for renovation, but it would be less than for Demolition Alternative. The Viable Adaptive Reuse Alternative would have a **beneficial, negligible, and long-term impact** on embodied carbon.

3.6.2.3 No Action Alternative

Greenhouse Gas Emissions

In their current state, the buildings are vacant and therefore not consuming electricity, gas, or water. Waste generation is limited to any contracted emergency repairs and therefore minimal. Activities at the vacant buildings include periodic inspections and emergency repairs. No staff are commuting to the building regularly. As such, it is estimated that emissions for the No Action Alternative with continued vacancy and maintenance would be minimal. Therefore, GHG emissions would result in **negative, negligible, long-term impacts**.

Climate Change

The vacant buildings could face risks from climate change, including natural hazards. Flooding poses the greatest risk to the vacant buildings because some of the critical equipment has been placed in the basement of the buildings. Even though the systems in the basement may be affected by flooding, they are currently not in use because the building is vacant. If the building continues to be vacant, the impact of natural hazards would remain low. While wildfire is highly

unlikely in Chicago, because of the current inoperability of the fire suppression systems within the three buildings at 202, 214, and 220 South State Street, that risk is present. Climate change would have a **negative, negligible, and long-term impact** on the buildings.

Embodied Carbon

Under the No Action Alternative, the only materials to be purchased would be those needed for emergency maintenance, which are anticipated to be limited. As such, embodied carbon emissions would be minimal. There would be a **negligible impact**.

3.6.2.4 Alternative Comparison

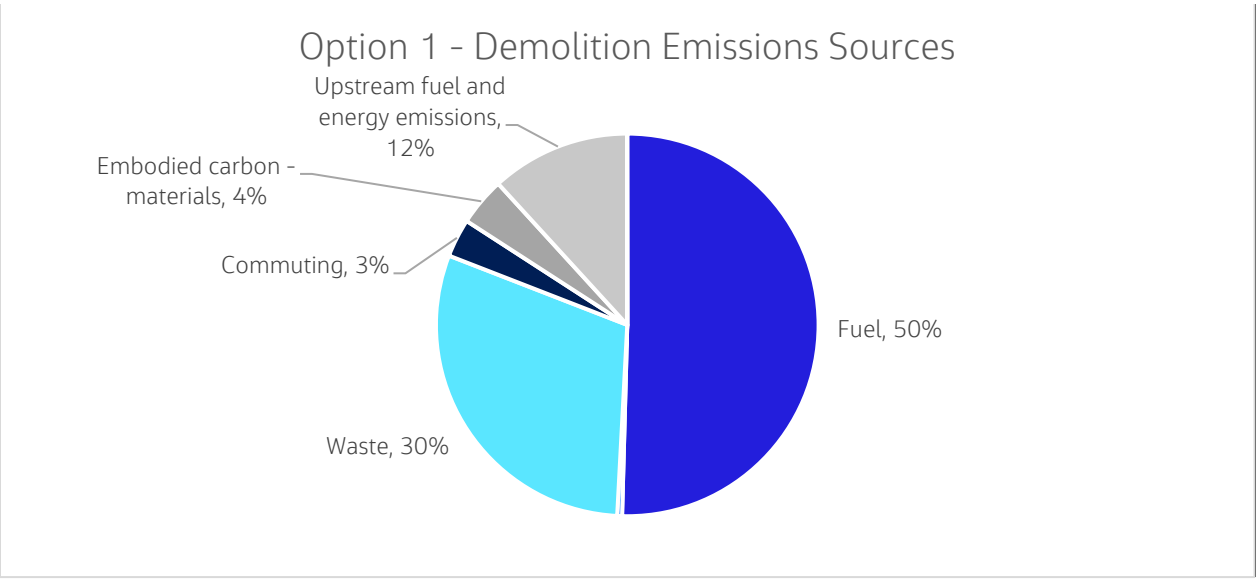
In summary, the No Action Alternative results in minimal emissions because the buildings are vacant and not consuming any fuel or electricity and not generating waste. Activities are limited to occasional inspections and minimum repairs. For the Demolition Alternative, total emissions are estimated at 6,980 tonnes of carbon dioxide, primarily direct impacts from fuel combustion and indirect impacts from waste disposal and transportation. The Viable Adaptive Reuse Alternative is estimated to emit 8,050 tonnes of carbon dioxide during construction and rebuild, primarily due to embodied carbon of construction materials and mechanical equipment (4,420 tonnes carbon dioxide) and fuel combustion of construction equipment (1,270 tonnes carbon dioxide). Lifetime operational emissions for the adaptive reuse alternative are estimated to be 71,600 tonnes carbon dioxide. Therefore, the short-term GHG impact for both alternatives is similar and significant; however, the adaptive reuse alternative would extend the life of the buildings, and the long-term impact may be greater but balanced by other benefits as discussed in other parts of this section (Tables 3.6-9 and 3.6-10).

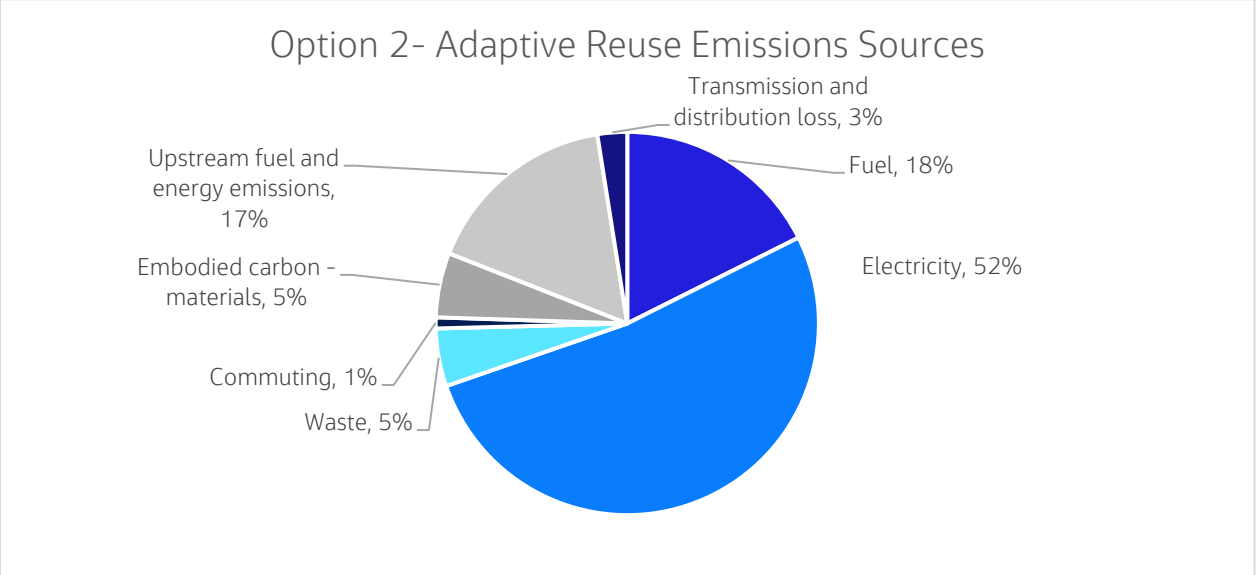
Table 3.6-9. GHG Emissions Results for All Action Alternatives (direct and indirect; in tonnes)

Emissions	Demolition	Viable Adaptive Reuse
Total Carbon Dioxide	6,980	79,650
Total Methane	20	43
Total Nitrous Oxide	0.05	0.64
Direct Carbon Dioxide	3,780	14,240
Direct Methane	0.15	0.29
Direct Nitrous Oxide	0.03	0.03
Indirect Carbon Dioxide - Electricity	30	41,800
Indirect Methane – Electricity	0.002	3.81
Indirect Nitrous Oxide – Electricity	0.0004	0.56
Indirect Carbon Dioxide – Other Categories	3,200	23,470
Indirect Methane – Other Categories	20	39
Indirect Nitrous Oxide – Other Categories	0.02	0.05

Table 3.6-10. GHG Emissions Results for All Action Alternatives (by activity type)

Emissions	Demolition	Viable Adaptive Reuse
Total – Carbon Dioxide	6,980	79,650
Total – Methane	20	43
Total – Nitrous Oxide	0.05	0.64
Construction/Demolition – Carbon Dioxide	6,980	8,050
Construction/Demolition – Methane	20	7
Construction/Demolition – Nitrous Oxide	0.05	0.03
Operational Emissions – Carbon Dioxide	Not applicable	71,600
Operational Emissions – Methane	Not applicable	36
Operational Emissions – Nitrous Oxide	Not applicable	0.6





3.6.3 Mitigation Measures

As part of the country's participation in the Paris Agreement, the U.S. has agreed to meet 2030 carbon reduction targets of 50 percent from a 2005 baseline. Additionally, the U.S. has committed to achieving net zero emissions economy-wide by no later than 2050. The State of Illinois has developed targets for reaching 100 percent renewable energy by 2050. The City of Chicago has also set an 80 percent GHG reduction target for 2050. Therefore, with these reduction targets in mind, GSA will consider implementing the following mitigation measures as it moves forward.

During the construction phase, mitigation of GHG can be achieved by reducing fuel consumption of equipment as much as possible. This could include choosing electric equipment over fuel burning equipment when possible as well as minimizing the operating times of fuel equipment and reducing idling times of construction vehicles. Where possible, GSA would use electric

starting aids such as block heaters for older vehicles. For on-road and off-road vehicles, GSA would prioritize vehicles that meet model year 2010 exhaust standards (on-road) and Tier 4 standards for non-road vehicles. Vehicles and equipment would be maintained consistent with manufacturers' recommendations to ensure optimal operations. Newer vehicles and equipment with more effective exhaust technology would be prioritized.

Emissions from waste disposal can be mitigated by maximizing diversion of waste from landfill to the greatest extent possible, which reduces emissions associated from the transportation and degradation of waste. Encouraging and/or incentivizing work teams to use mass transit and utilize more fuel efficient vehicles to come to the work site will also help minimize commuting emissions.

For adaptive reuse, the design team would carefully consider the materials being used to rebuild the interiors and emphasize materials with lower carbon intensities and recycled content. Local vendors would be prioritized to help minimize supply chain emissions. New mechanical/ electrical and plumbing equipment decisions would also consider energy efficiency, and electrification would be prioritized over fuel combustion. The design team would also consider designing to qualify for Leadership in Energy and Environmental Design (LEED) and/or Energy Star certification. The implementation of smart building operational systems that includes room sensors and automated temperature set points during periods of limited occupation would also be considered to reduce electricity demand.

During the operational phase of the adaptive reuse, emissions can be minimized by encouraging and incentivizing the use of mass transit and fuel-efficient vehicles for travel to the work place. Additionally, energy efficient technology both for building operations and business operations would be considered (e.g., Energy Star appliances, computers, and server equipment). Significant diversion of waste from landfill will also help minimize emissions from waste disposal. Additionally, GSA would discuss purchasing clean power with its utility provider.

Given the risks identified in the previous section, resilience and adaptation solutions would be considered for the mechanical, electrical and plumbing equipment in the basements of the buildings under the Viable Adaptive Reuse Alternative that would be under medium or high risk. Such measures can include equipment changes or other updates to the physical assets, or can be procedures, and education of the users. Ice storms and hail were removed from the evaluation because no high or medium risks were identified for that hazard. Table 3.6-11 lists the mitigation strategies that are suggested based on the key hazards.

The overarching strategies to mitigate the impacts of climate change include resilience solutions and adaptation to the changing climate. Resiliency solutions include installing green infrastructure around the building to serve as flood control, or to provide shade. Currently, 202, 214, and 220 South State Street are not within floodplain; however, this could change as a result of more severe weather events due to climate change. Because of the flooding risk increasing due to climate change, and because much of the critical equipment is placed in the basement of the building, that equipment could be moved to higher floors to minimize the risk of halting building operations. As the energy demands might be growing due to a higher frequency of heat waves or cold waves, having sufficient energy back-ups and ensuring that the energy infrastructure is not placed in the basements can support continuous operation. Weatherization of any equipment (such as the heating, ventilation, and air-conditioning system or pipes) that might be exposed to cold waves can ensure continuous operation.

Demolition would take place over approximately 2 years, which is why climate risk would be lower for that alternative. Nonetheless, current risks include high winds and flooding. Even though there are mitigating strategies like using water to control dust during the demolition, pausing demolition during high wind could also be applied. Similarly, basement water containment is used to avoid contaminating storm runoff, but containing water onsite, or removal of water as a hazardous substance can mitigate risks posed by flooding.

Landscaping the project site can serve as a resilience solution to the City of Chicago. Based on the Climate Action Plan for the Chicago Region (Makra and Gardiner 2021), extreme heat and flooding pose an extremely high risk to the city. The action plan's solutions to these risks include green infrastructure to manage stormwater and provide cooling islands for cooling the neighborhoods. By selecting the best landscaping approaches that provide flood management, shade to protect from heat island effect, and purify the air at the site, the project can help Chicago build resiliency to climate hazards.

Table 3.6-11. Resilience and Adaptation Solutions to Mitigate Climate Risk

Alternative	Asset Type	Cold Wave and Winter Weather (High Hazard Likelihood)	Heat Wave (Very High Hazard Likelihood)	Flooding (Very High Hazard Likelihood)	Tornado, Strong Wind, Hurricane (Relatively Low to Very High Hazard Likelihood)	Drought and Wildfire (Low Hazard Likelihood)
No Action Alternative	1. Physical asset	-Not applicable	Not applicable	Install green infrastructure near the building such as rain gardens	Not applicable	Not applicable
No Action Alternative	2. Water and steam utilities	Weatherize pipes	Not applicable	Move the equipment up from the basement	Not applicable	Not applicable
No Action Alternative	3. Mechanical, plumbing, HVAC systems	Weatherize and protect from the cold	Not applicable	Not applicable	Install tie-downs to withstand the wind	Not applicable
No Action Alternative	4. Energy system	Supply sufficient energy backup needed to mitigate cold wave impacts	Add energy backup (including not in the basement)	Move the equipment up from the basement	Not applicable	Not applicable

Alternative	Asset Type	Cold Wave and Winter Weather (High Hazard Likelihood)	Heat Wave (Very High Hazard Likelihood)	Flooding (Very High Hazard Likelihood)	Tornado, Strong Wind, Hurricane (Relatively Low to Very High Hazard Likelihood)	Drought and Wildfire (Low Hazard Likelihood)
No Action Alternative	5. Electrical utility vault	Not applicable	Not applicable	Move the equipment up from the basement	Not applicable	Not applicable
No Action Alternative	6. Fire suppression system	Not applicable	Update the fire suppression system to make sure it is operational and up to code	Not applicable	Not applicable	Update the fire suppression system to make sure it is operational and up to code
Viable Adaptive Reuse Alternative	1 to 6 are the same as in the No Action Alternative	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Viable Adaptive Reuse Alternative	7. Building users	Not applicable	Right-scale the HVAC system to meet the demand; provide natural cooling through plant shade	Not applicable	Not applicable	Not applicable

Alternative	Asset Type	Cold Wave and Winter Weather (High Hazard Likelihood)	Heat Wave (Very High Hazard Likelihood)	Flooding (Very High Hazard Likelihood)	Tornado, Strong Wind, Hurricane (Relatively Low to Very High Hazard Likelihood)	Drought and Wildfire (Low Hazard Likelihood)
Demolition Alternative	8. Demolition waste including hazardous materials	Not applicable	Not applicable	Not applicable	There is a mitigation strategy applied already – dust water control; a procedure may be added to pause any demolition during high-wind event	Not applicable
Demolition Alternative	9. Basement water containment	Not applicable	Not applicable	Consider secondary containment of water, or align removal as hazardous substance before a potential flood	Not applicable	Not applicable
Demolition Alternative	10. Landscaped public space	Weatherize water pipes if keeping water in them over winter months	Not applicable	Select plants that can act as flooding control (e.g., as a rain garden)	Not applicable	Select drought-tolerant species

Alternative	Asset Type	Cold Wave and Winter Weather (High Hazard Likelihood)	Heat Wave (Very High Hazard Likelihood)	Flooding (Very High Hazard Likelihood)	Tornado, Strong Wind, Hurricane (Relatively Low to Very High Hazard Likelihood)	Drought and Wildfire (Low Hazard Likelihood)
Demolition Alternative	11. Public space visitors	Not applicable	Plant trees that produce shade to reduce heat island effect. Ensure that watering stations are set up for the public in case of a heat wave.	Not applicable	Not applicable	Not applicable

3.7 Hazardous Materials and Solid Waste

This section describes existing conditions and the potential impacts to hazardous materials and solid waste generation under the Action Alternatives and the No Action Alternative. Hazardous materials may include petroleum products, pesticides, organic compounds, heavy metals, ACM, lead-based paint, or other compounds that could harm human health or the environment (42 CFR Part 9601). Solid waste is material that may be used and generated during demolition or construction.

3.7.1 Affected Environment

This section discusses the hazardous materials that may be present at 202, 214, and 220 South State Street and the solid waste that may be used and generated under the Action Alternatives. The following laws and executive orders regulate the management of hazardous materials and solid waste.

At the federal level, regulations include the Resource Conservation and Recovery Act (RCRA) (40 CFR Parts 239–282); the Comprehensive Environmental Response, Compensation, and Liability Act (42 CFR Part 9601); the Superfund Amendments and Reauthorization Act (42 CFR Part 9601); and the Toxic Substances Control Act (15 U.S.C. Section 2601). At the state level, regulations and programs include the Illinois Environmental Protection Act. Locally, the City of Chicago Police Department, City of Chicago Fire Department, and Department of Public Health regulate and oversee issues related to hazardous material and solid waste.

3.7.1.1 Solid Waste

Four landfills are in the Chicago metropolitan area. Cumulatively, these landfills have approximately 25 million cubic yards of capacity, which is enough for about 8 years at recent waste generation levels. Landfills in other regions of Illinois have about 431 million cubic yards of capacity (Illinois Environmental Protection Agency 2022). In addition, some Chicago-area waste is landfilled in Indiana. All of these landfills have the ability to receive nonhazardous construction and demolition debris, including ACM, but they do not accept hazardous waste. Table 3.7-1 lists the four landfills in the Chicago metropolitan area, along with the annual waste received, remaining capacity, life-time expectancy, type of waste received, and distance from the project site. Currently, the three buildings at 202, 214, and 220 South State Street are vacant and do not generate any waste.

Table 3.7-1. Landfills in the Chicago Area

Name and Location	Annual Waste Received	Remaining Capacity	Life-time Expectancy	Type of Waste Received	Distance from Project Site
Countryside Landfill Inc. in Grayslake, Illinois	371,346 cubic yards	1,516,739 cubic yards	4 years	Nonhazardous construction and demolition debris, including ACM[a]	44 miles
Laraway Recycling and Disposal Facility in Joliet, Illinois	1,288,885 cubic yards	5,405,667 cubic yards	4 years	Nonhazardous construction and demolition debris, including asbestos, including ACM[b]	44 miles
Prairie View Recycling and Disposal Facility in Wilmington, Illinois[c]	833,145 cubic yards	13,167,434 cubic yards	16 years	Nonhazardous construction and demolition debris, including ACM[c]	53 miles
Zion Landfill in Zion, Illinois[d]	644,574 cubic yards	4,573,014 cubic yards	7 years	Nonhazardous construction and demolition debris[d]	47 miles

[a] Waste Management Solutions 2023a
[b] Waste Management Solutions 2023b
[c] Waste Management Solutions 2023c
[d] Advanced Disposal 2023

3.7.1.2 Potentially Hazardous Materials

The following sections describe the potentially hazardous materials that could be present in the buildings at 202, 214, and 220 South State Street. The most likely hazards associated with the buildings are the presence of ACM and lead-based paint. Other hazardous material that could be present at the buildings include petroleum storage tanks, polychlorinated biphenyl (PCB), and other potentially hazardous and regulated building materials. No nearby facilities were identified in the surrounding area that are likely to pose an environmental concern to the project site (Versar 2005a, 2005b, 2006a, 2006b). The following sections provide more detail on the presence of potentially hazardous materials.

Asbestos-containing Materials

Multiple surveys demonstrate that ACM is known to exist in 202 and 220 South State Street and suspected to exist in 214 South State Street (Versar 2005d, 2006c). ACM was commonly used for insulation and fireproofing at the time the buildings were constructed. Importantly, ACM does not generally present a health hazard unless the asbestos is disturbed and fibers are released into the air, which then could present various health risks (Agency for Toxic Substances and Disease Registry 2022). Refer to Section 3.10, Health and Safety, for further information on health risks associated with potentially hazardous materials, including ACM.

The following provides details from the findings of the various ACM surveys for each of the buildings.

- **202 South State Street:** Identified in vinyl floor tiles and tile adhesive, concrete filler, caulk, vibration damper cloth, felt paper, and transite. Although not sampled, roofing materials may contain ACM (Versar 2006a).
- **214 South State Street:** Assumed ACM in vinyl floor tiles and tile adhesive. Additional ACM was reportedly confirmed by sampling (Versar 2005c).
- **220 South State Street:** Identified in vinyl floor tiles and tile adhesive, pipe wrap, pipe elbows and ducts insulation, window caulking, and roofing materials including flashing (Versar 2006c).

Lead-Based Paint

Multiple surveys demonstrate that various amounts of lead-based paint are known or suspected to be present in all three buildings at 202, 214, and 220 South State Street (Versar 2005c 2006c). Lead-based paint was commonly used at the time the buildings were constructed. Importantly, lead-based paint does not generally present a health hazard unless it is chipping, peeling, or cracking, which may create airborne dust that can be inhaled or ingested. Refer to Section 3.10, Health and Safety, for further information on health risks associated with potentially hazardous materials.

Petroleum Storage Tanks

No records indicate the installation or removal of petroleum storage tanks at the buildings, including any aboveground or underground tanks (Versar 2005a, 2005b, 2006a, 2006b; EDR 2022). However, it is possible that tanks were installed before records were kept.

Polychlorinated Biphenyls

No records indicate any equipment containing PCBs is present in the three buildings at 202, 214, and 220 South State Street. PCBs have many industrial and commercial applications, including electrical and hydraulic equipment and plasticizers in paints, plastics, and rubber products. However, due to the age of the buildings, it is possible that some transformers or electrical equipment may contain PCBs remain in the buildings.

Other Potentially Hazardous and Regulated Building Materials

Although not surveyed or identified in available records, other potentially hazardous and regulated building materials could be present in the buildings. These may include fluorescent, halide, or sodium vapor lamps containing mercury; smoke detectors and emergency exit signs containing low-level radioactive sources; mercury switches; electronic ballasts containing PCBs and/or other fluids; ethylene glycol from building air conditioning equipment; and various equipment containing batteries.

202 South State Street is in the RCRA Conditionally Exempt Small Quantity Generator database for materials generated during building construction in 2009. This is likely associated with waste generated during installation of a boiler (EDR 2022).

3.7.2 Environmental Consequences

This section describes the potential impacts related to hazardous materials and solid wastes under the Action Alternatives and the No Action Alternative. Table 3.7-2 presents impact thresholds for hazardous materials and solid wastes.

Table 3.7-2. Impact Thresholds for Hazardous Materials and Solid Wastes

Impact	Description
None or Negligible	There would be no impacts related to hazardous materials or solid waste, or any risk from hazardous materials or waste generated would be the same or nominal compared to existing conditions.
Minor to moderate	Impacts to hazardous materials would be detectable, but result in barely perceivable change in risk to the human or natural environment. The solid wastes generated would be an increase from existing conditions, but would be within the capacity of local landfills.
Significant	Impacts to hazardous materials would be detectable and result in a substantial change in risk to the human or natural environment. The solid wastes generated would be an increase from existing conditions, and would be exceed the capacity of local landfills.
Quality	Beneficial – would have a positive effect on hazardous materials or solid wastes Negative – would have an adverse effect on hazardous materials or solid wastes
Duration	Short term – would occur only during construction period. Long term – would continue beyond the construction period.

3.7.2.1 Alternative A, Demolition

Solid Waste

Demolishing the three buildings at 202, 214, and 220 South State Street would generate an estimated 58,000 cubic yards of debris before reuse or recycling (1 cubic yard is 27 cubic feet, or 3 feet wide by 3 feet tall by 3 feet deep). Transporting debris to a landfill would require approximately 3,625 to 5,800 dump truck trips, assuming a 10- to 16-cubic-yard capacity per truck. This would be approximately 16 dump trucks per day on the site during a year of removal. If debris such as crushed concrete or masonry is harvested and used to backfill the below-ground levels or is recycled, then debris going to landfills would be reduced by about 25 percent (14,500 cubic yards).

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.

Hazardous Materials

Demolishing the three buildings at 202, 214, and 220 South State Street would likely destroy embodied hazardous materials and generate hazardous waste, primarily from ACM, lead-based paint, and other potentially hazardous materials. Prior to demolition, additional surveys would be conducted to confirm and quantify any hazardous building materials, and these materials would be removed and disposed of in accordance with applicable regulations.

Demolition would require temporary transport, use, storage, and disposal of hazardous materials, petroleum products, and wastes. Commonly used hazardous materials include diesel fuel, gasoline, and solvents. Accidental spills or releases could occur during construction; however, hazardous materials and waste would be used, stored, disposed of, and transported in compliance with all applicable laws and regulations. In addition, prior to demolition, a demolition management plan would outline protocols for workers to follow if unexpected soil or groundwater contamination were encountered. There would be a **beneficial, minor, long-term impact** as a result of the removal of existing hazardous materials from the project site.

3.7.2.2 Alternative B, Viable Adaptive Reuse

Solid Waste

GSA did not calculate the construction debris that would be generated under this alternative because the specific use of the three buildings under this alternative is not currently known. However, it would be only a small fraction of the debris generated by demolition. Therefore, renovation would result in a **negative, negligible, long-term impact** to landfills from the renovation-related solid waste.

Hazardous Materials

The adaptive reuse of the 202, 214, and 220 South State Street would have similar impacts to those described for the Demolition Alternative but to a lesser magnitude because reuse would not involve demolishing the buildings. ACM, lead-based paint, and other hazardous materials would need to be abated and removed prior to beginning any renovations. However, it may be possible to leave various building furnishings and infrastructure in place if ACM and lead-based paint are in good condition and undisturbed. Some amount of hazardous waste material would continue to be generated due to building operations and maintenance. Removing existing hazardous materials during renovation would result in a **beneficial, minor, long-term impact**.

3.7.2.3 No Action Alternative

Under the No Action Alternative, GSA's maintenance of 202, 214, and 220 South State Street would continue as needed, which could generate minor amounts of hazardous waste and other regulated wastes such as ACM, lead-based paint, or PCB-containing wastes from building repairs. All wastes, including hazardous wastes and other wastes requiring special handling and disposal, would be managed in accordance with federal, state, and local regulations. No additional impacts related to hazardous materials or wastes would likely occur beyond those occurring under current conditions. No construction debris would be generated by this alternative, so there would be **no impact**.

3.7.3 Mitigation Measures

Measures that would reduce impacts from hazardous materials and solid wastes under the Action Alternatives are discussed in this section.

To prevent exposure to workers or the release of hazardous waste and materials to the environment, GSA would survey the buildings to locate and determine the extent of hazardous and regulated building materials prior to renovations or demolition. This survey would inform future mitigation and abatement for proper handling and disposal in accordance with government regulations. Completion of an updated survey would likely be required by the City of Chicago.

GSA would prepare a Materials Management Plan to address the potential for encountering areas of environmental concern (e.g., regulated building materials, contaminated soil and/or groundwater) during demolition or renovation of the buildings' basement areas. The Materials Management Plan would identify specific measures to address hazardous waste and materials clean-up efforts, including monitoring, handling, stockpiling, characterization, onsite reuse, and export and disposal protocols for excavated soil and groundwater that requires management.

If PCB-containing materials are identified, abatement would occur in accordance with government regulations, and soil or surfaces beneath transformers would be evaluated for evidence of releases. If PCB is present in underlying soils, then abatement, removal, and disposal would also follow government regulations.

All spills or releases of petroleum oil lubricating products, hazardous materials, pollutants or contaminants would be handled in accordance with a Spill Prevention and Response Plan prepared for the project.

All potentially hazardous wastes generated would be properly characterized, segregated, and managed onsite prior to offsite disposal.

GSA would implement measures to divert as much of the debris as possible from landfills for reuse.

3.8 Air Quality

This section describes existing air quality conditions and the potential air quality impacts under the Action Alternatives and the No Action Alternative.

In accordance with federal Clean Air Act requirements, the air quality in a given region or area is measured by the concentrations of pollutants in the air, defined as that portion of the atmosphere to which the public has access. The air quality in a region depends on the types and quantities of atmospheric pollutants and pollutant sources in an area, surface topography, the size of the topological "air basin," and the prevailing meteorological conditions.

3.8.1 Affected Environment

Federal air quality policies are defined in the Clean Air Act. Pursuant to this act, EPA has established National Ambient Air Quality Standards (NAAQS) for pollutants considered to affect human health and the environment. The NAAQS represent the maximum allowable concentrations for the following air pollutants: ozone, carbon monoxide, nitrogen dioxide, sulfur oxides, respirable particulate matter (including particulate matter less than or equal to 10 micrometers in diameter [PM_{10}] and particulate matter less than or equal to 2.5 micrometers in diameter [$PM_{2.5}$]), and lead (40 CFR Part 50). The Clean Air Act also authorizes states to establish air quality rules and

regulations to meet air quality standards. EPA has delegated the authority for ensuring compliance with the NAAQS in Illinois to the Illinois Environmental Protection Agency. The State of Illinois has adopted the federal NAAQS levels. Table 3.8-1 presents the EPA NAAQS and Illinois ambient air quality standards.

The Clean Air Act also requires EPA to designate areas as in attainment, nonattainment, or maintenance, or unclassified for each of the criteria pollutants, depending on whether the area meets the NAAQS. Attainment means that the air quality within a designated area meets the NAAQS; nonattainment means that criteria pollutant levels exceed NAAQS, and an area that is designated nonattainment is subject to planning requirements to attain the standard; maintenance means that an area was previously designated nonattainment but is now in attainment with approved maintenance plans; and unclassified means that there is not enough information to appropriately classify, so the area is considered in attainment. In accordance with the Clean Air Act, each state must develop and maintain a state implementation plan outlining how the state will comply with the NAAQS.

The Clean Air Act General Conformity Rule (40 CFR Part 93, Subpart B) requires that federal actions conform with the requirements of the applicable state implementation plan or federal implementation plan. More specifically, Clean Air Act conformity is ensured when a federal action does not cause a new violation of the NAAQS; contribute to an increase in the frequency or severity of violations of NAAQS; or delay the timely attainment of any NAAQS, interim progress milestones, or other milestones toward achieving compliance with the NAAQS. The General Conformity Rule applies only to federal actions in nonattainment or maintenance areas. Illinois has incorporated the federal General Conformity Rule by reference in Title 35 of the *Illinois Administrative Code* Part 255.

The General Conformity Rule establishes federal *de minimis* thresholds in 40 CFR Section 93.153(b) for individual criteria pollutants and their precursors. The applicable thresholds depend on the EPA-designated attainment status for each NAAQS pollutant in the project area. The thresholds are applicable only to increases of pollutants and their precursors associated with federal actions in nonattainment and maintenance areas. These emissions rates (represented in tons per year) are used to delineate federal actions with the potential to conflict with the applicable state implementation plan or substantially and adversely affect air quality. If the federal action includes sources that require new source review permitting, that portion of the action is not subject to conformity determination (40 CFR Section 93.153(d)).

Table 3.8-1. National Ambient Air Quality Standards

Criteria Pollutant	Federal Standard (Averaging Period) [a]
Carbon monoxide	35 ppm (1 hour)
Carbon monoxide	9 ppm (8 hour)
Nitrogen dioxide	100 ppb (1 hour)
Nitrogen dioxide	53 ppb (annual arithmetic mean)
Ozone	0.070 ppm (8 hour)
Particulate matter equal to or less than 2.5 micrometers in diameter ($PM_{2.5}$)	12 µg/m^3 (annual arithmetic mean)

Criteria Pollutant	Federal Standard (Averaging Period) [a]
Particulate matter equal to or less than 2.5 micrometers in diameter ($PM_{2.5}$)	35 µg/m^3 (24 hour) [b]
Particulate matter equal to or less than 10 micrometers in diameter (PM_{10})	150 µg/m^3 (24 hour)
Sulfur dioxide	0.5 ppm (3-hour, secondary standard)
Sulfur dioxide	0.075 ppm (1 hour) [b]
Lead	0.15 µg/m^3 (rolling 3-month average)

Source: EPA 2022

[a] National standards other than ozone, particulate matter, and those based on annual averages or annual arithmetic means are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, is equal to or less than the standard. For nitrogen dioxide, the 1-hour stand[ar]d is achieved if the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each monitor in an area does not exceed 0.100 ppm (100 ppb). The lead standard is not to be exceeded.

[b] To attain this standard, the 3-year average of the 99th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 75 ppb.

µg/m^3 = microgram(s) per cubic meter

ppb = part(s) per billion, by volume

ppm = part(s) per million, by volume

3.8.1.1 Air Quality in Project Area

The project area is in downtown Chicago in Cook County, Illinois. None of the three buildings at 202, 214, and 220 South State Street are considered stationary sources of air pollution. The project area is currently designated as attainment/unclassified for all criteria pollutants except ozone, particulate matter, and lead. Cook County is currently designated as maintenance for the PM_{10}, $PM_{2.5}$, and lead standards, and moderate nonattainment for the 2015 8-hour ozone standard. Cook County was re-designated from serious nonattainment to maintenance for the 2008 8-hour ozone standard on May 20, 2022. Table 3.8-2 summarizes the attainment status for the criteria pollutants in the Chicago area.

Table 3.8-2. NAAQS Attainment Status for Chicago, Cook County

Criteria Pollutant	Cook County Attainment Status
Carbon monoxide	Attainment/Unclassified
Lead	Maintenance – (2008 Standards)
Nitrogen Dioxide	Attainment/Unclassified
Particulate matter equal to or less than 10 micrometers in diameter	Maintenance – (1987 Standards)
Particulate matter equal to or less than 2.5 micrometers in diameter	Maintenance – (1997 Standards)
Ozone	Maintenance – (2008 Standards)

Criteria Pollutant	Cook County Attainment Status
Ozone	Nonattainment – Moderate (2015 Standards)
Sulfur Dioxide	Attainment/Unclassified

Source: EPA n.d.

3.8.2 Environmental Consequences

This section describes the potential impacts to air quality under the Action Alternative and the No Action Alternative. The environmental consequences to local and regional air quality conditions from the Action Alternatives are evaluated based on the increases in regulated pollutant emissions relative to existing conditions, the No Action Alternative, and relevant regulatory thresholds. Impacts to air quality in NAAQS nonattainment or maintenance areas are categorized based on their significance and capability to conflict with the plans to achieve standards (the applicable state implementation plan). Table 3.8-3 presents impact thresholds for air quality and the General Conformity Rule *de minimis* emissions thresholds.

Table 3.8-3. Impact Thresholds and General Conformity *de minimis* Emissions Thresholds for Air Quality

Impact	Description
None or negligible	No impacts to air quality would be expected, or impacts to air quality would not be noticeable or measurable.
Minor to Moderate	Criteria pollutant or precursor emissions for which the area is classified as nonattainment or maintenance are measurable but less than the following *de minimis* thresholds established in 40 CFR Section 93.153: ▪ Ozone[a] (Moderate Nonattainment): 100 tons per year ▪ Lead (Maintenance): 25 tons per year ▪ PM_{10} (Maintenance): 100 tons per year ▪ $PM_{2.5}$[b] (Maintenance): 100 tons per year
Significant	Project-related emissions would cause or contribute to a violation of any NAAQS, increase the frequency or severity of a violation of any NAAQS, or delay the attainment of other milestone contained in the state implementation plan or permit limitations. Criteria pollutant or precursor emissions for which the area is classified as nonattainment or maintenance are greater than the following *de minimis* thresholds established in 40 CFR Section 93.153: ▪ Ozone[a] (Moderate Nonattainment): 100 tons per year ▪ Lead (Maintenance): 25 tons per year ▪ PM_{10} (Maintenance): 100 tons per year ▪ $PM_{2.5}$ [b] (Maintenance): 100 tons per year
Quality	Beneficial – would have a positive effect on air quality. Negative – would have an adverse effect on air quality.
Duration	Short term – would occur only during the proposed construction period. Long term – would continue beyond the proposed construction period.

[a] Calculated as emissions of ozone precursor pollutants, nitrogen oxides, or volatile organic compounds.
[b] Calculated as emissions of direct $PM_{2.5}$, sulfur dioxide, nitrogen oxides, volatile organic compounds, and ammonia.

3.8.2.1 Alternative A, Demolition

Demolition would generate air pollutant emissions primarily from site-disturbing activities such as building deconstruction, debris removal, grading, filling, compacting, trenching, and operating construction and demolition equipment. Demolition would also generate particulate emissions such as fugitive dust from ground-disturbing activities and from the combustion of fuels in construction and demolition equipment. Fugitive dust emissions would be greatest during the building demolition and would vary from day to day depending on the construction phase, level of activity, and weather conditions. The quantity of uncontrolled fugitive dust emissions from a construction site is proportional to the area being disturbed and the level of activity. Criteria pollutants emissions would be generated from the combustion of fossil fuels in demolition equipment. Construction workers commuting daily to and from the construction site and material hauling vehicle trips would also result in criteria pollutant emissions.

Criteria pollutants emissions from demolition would consist primarily of particulate matter emissions from demolition, debris removal, grading, filling, compacting, and fossil fuel combustion emissions from operating equipment. Criteria pollutant emissions from these activities would conclude upon completing demolition. Criteria pollutant emissions from these activities are not anticipated to exceed any of the applicable General Conformity Rule *de minimis* levels in Table 3.8-3.

Further conformity determination is not required, as demolition would not cause or contribute to a violation of any NAAQS, worsen an existing violation, or delay the timely attainment of the NAAQS. **Negative, minor, short-term impacts** on local air quality and **negative, negligible, short-term impacts** on regional air quality would result from demolition. GSA would incorporate BMPs and control measures, such as those described in EPA's Construction Emission Control Checklist (Appendix D, Agency Correspondence), to control emissions from demolition and construction activities.

3.8.2.2 Alternative B, Viable Adaptive Reuse

Adaptive reuse of 202, 214, and 220 South State Street would involve interior demolition and construction at the project site. Construction and interior demolition would closely resemble those described in Section 3.8.2.1 for the Demolition Alternative, but they would likely be less extensive.

Air pollutant emissions would be generated primarily from combustion of fuels in construction and demolition equipment. Criteria pollutant emissions from these activities would conclude upon completing renovations to the buildings. Criteria pollutant emissions from these activities are anticipated to equivalent to or less than the emissions that would be generated by the Demolition Alternative, and the emissions are not anticipated to exceed any of the applicable General Conformity Rule *de minimis* levels in Table 3.8-3.

While a final adaptive reuse case for 202, 214, and 220 South State Street has not yet been determined, operational emissions under the Viable Adaptive Reuse Alternative are expected to primarily consist of fuel combustion emissions from comfort heating sources and are anticipated to be *de minimis*.

Further conformity determination is not required, as adaptive reuse would not cause or contribute to a violation of any NAAQS, worsen an existing violation, or delay the timely attainment of the NAAQS. **Negative, minor, short-term impacts** on local air quality and **negative, negligible, short-term impacts** on regional air quality would result from the Viable Adaptive Reuse Alternative. GSA would incorporate BMPs and control measures, such as those described in EPA's Construction Emission Control Checklist (Appendix D, Agency Correspondence), to control emissions from demolition and construction activities.

3.8.2.3 No Action Alternative

The No Action Alternative would not change current conditions. Therefore, **no impacts** to air quality would occur.

3.8.3 Mitigation Measures

GSA would incorporate BMPs and control measures, such as those described in EPA's Construction Emission Control Checklist, to control emissions from demolition and construction activities.

Fugitive dust emissions would be controlled with the frequent use of water and enclosures such as tarps to minimize fugitive particulate matter emissions. Fuel combustion emissions from equipment and vehicles would be further minimized by implementing an anti-idling policy and by planning work ahead to minimize the number of vehicles accessing the project site. Impacts to air quality would be further mitigated by staging vehicles at a location away from the project site and coordinating their arrival to prevent traffic congestion.

Additionally, real-time air monitoring of PM_{10} and volatile organic compound emissions would be conducted during demolition at upwind and downwind locations with air quality monitors equipped with a photoionization detector or equivalent. Four air monitoring stations would be used to allow for changing wind directions, with real-time wind direction and speed measured during demolition using an onsite meteorological station. The air monitoring stations would send a notification by text or email when preset action limits have been exceeded, allowing for immediate adjustments to construction and demolition to reduce impacts to local air quality. These action limits would be based on local standards and operational considerations (e.g., 50 parts per billion by volume of volatile organic compounds, 120 micrograms per cubic meter of PM_{10}).

3.9 Noise

This section describes existing noise levels and the potential noise impacts under the Action Alternatives and the No Action Alternative.

Noise is commonly defined as unwanted sound. Public annoyance is the most common impact of exposure to elevated noise. Noise is composed of many frequencies, so to obtain accurate measurements and descriptions of noise, the noise frequencies are filtered or weighted to most closely approximate the average frequency response of the human ear[13]. This weighting is called the "A" scale on sound-level meters. Decibel units described in this manner are referred to as A-weighted decibels, or dBA. The "A" scale is used for noise analyses.

3.9.1 Affected Environment

Table 3.9-1 lists the relative A-weighted sound levels of common sounds measured in the environment and in industry for various noise sources.

[13] Sound is created by acoustic energy, which produces pressure waves that travel through air and are sensed by the eardrum. Since the range of sound pressure ratios varies greatly over many orders of magnitude, a base-10 logarithmic scale is used to express sound levels in dimensionless units of decibels (dB). Sound travels in waves and varying frequencies are associated with each sound event. The human ear does not respond equally to all frequencies.

Table 3.9-1. Common Indoor and Outdoor Noises

Noise Source at a Given Distance	Noise Level (dBA)	Common Indoor Noises
Jet flyover at 300 meters	110	Rock band at 5 meters
Gas lawn mower at 1 meter	100	Inside subway train (New York)
Diesel truck at 15 meters	90	Food blender at 1 meter
Noisy urban daytime	80	Garbage disposal or shouting at 1 meter
Gas lawn mower at 30 meters	70	Vacuum cleaner at 3 meters or normal speech at 1 meter
Commercial area	60	Large business office
Quiet urban daytime	50	Dishwasher in next room
Quiet urban nighttime	40	Small theatre or large conference room (background) or library
Quiet suburban nighttime	30 to 25	Bedroom at night or concert hall
Quiet rural nighttime	20 to 15	Broadcast and recording studio
None	0 to 10	Threshold of hearing

Source: FHWA 2021

Noise-sensitive locations are where people reside or where the presence of unwanted sound could adversely affect the designated use of the land. Typically, noise-sensitive locations are residential areas, hospitals, places of worship, libraries, and schools as well as nature and wildlife preserves, and parks.

3.9.1.1 Noise in Project Area

The existing noise environment is categorized as *noisy urban daytime* with a noise level around 80 dBA (Table 3.9-1). The nearest noise sensitive location is The Berghoff restaurant, which is next door and west of 202 South State Street.

The Noise Control Act of 1972, as amended (42 U.S.C. Sections 4901 et seq.), requires facilities to maintain noise levels that do not jeopardize the health and safety of the public. This requirement applies to construction noise. The Municipal Code of Chicago, Chapter 8-32, Noise and Vibration Control (City of Chicago 2022d) regulates noise and vibration in the City. The code does not have noise level or vibration limits on construction with the exception of limits to working hours.

3.9.2 Environmental Consequences

This section identifies the potential impact from noise that could result from the Action Alternatives and the No Action Alternative. The impact thresholds related to noise are presented in Table 3.9-2.

Table 3.9-2. Impact Thresholds for Noise

Impact	Description
None or Negligible	No noise increase or a non-perceptible noise increase.
Minor	A barely perceptible noise increase.
Moderate	A readily perceptible noise increase but generally would not affect daily activities and would not result in hearing damage.
Significant	A disruptive noise increase, which would significantly affect daily activities and may result in hearing damage.
Quality	Beneficial – would have a positive effect on noise. Negative – would have an adverse effect on noise.
Duration	Short-term – would occur only during the construction period. Long-term – would continue after the construction period.

3.9.2.1 Alternative A, Demolition

Demolishing 202, 214, and 220 South State Street would generate noise as well as vibrations from demolition equipment and vehicles. Demolition would be conducted using standard construction equipment and demolition methods. Table 3.9-3 outlines the predicted noise level at 50 feet (dBA) for typical construction equipment that could be used during demolition. The measured noise levels in Table 3.9-3 are based on FHWA research (FHWA 2006) and meant to serve as a representation of potential noise from the Proposed Action.

Table 3.9-3. Predicted Noise Levels for Construction Equipment

Construction Equipment	Predicted Noise Level at 50 feet (dBA)
Jackhammer	89
Dozer	82
Crane	81
Roller	80
Concrete Mixer Truck	78
Backhoe	78
Paver	77
Dump Truck	76

Source: FHWA 2006

Noise for any specific receptor would be dominated by the closest and loudest equipment and would increase as more equipment is used simultaneously. Noise levels decrease with distance from the source and are reduced by barriers, both artificial and natural, such as vegetation, buildings, atmospheric absorption, and terrain features. The main source of noise during the

demolition of the buildings would be the noise from construction equipment. The nearest noise sensitive location is The Berghoff restaurant, which is next door to 202 South State Street. The Dirksen Courthouse is about 80 feet west of 202, 214, and 220 South State Street. The Downtown Islamic Center, which hosts prayers and programming, is across the street from 220 South State Street, and DePaul University has classrooms in its building across the street and about 200 feet south of 220 South State Street. These buildings and adjacent street-level retail and upper-floor offices would experience higher noise levels.

Demolition would result in a readily perceptible noise, but all activities would occur in accordance with the Municipal Code of Chicago, Chapter 8-32, Noise and Vibration Control (City of Chicago 2022d) and between the hours of 8 a.m. and 8 p.m. Therefore, the demolition would have a **negative, moderate, short-term impact** to the neighboring community from noise. After demolition, there would be no noise impact.

3.9.2.2 Alternative B, Viable Adaptive Reuse

Construction equipment and mitigation measures similar to those described in Section 3.9.2.1 would be used for adaptive reuse, resulting in a similar effect. However, noise levels would likely be less than those generated by demolishing the buildings. Adaptive reuse of the three buildings at 202, 214, and 220 South State Street would have a **negative, moderate, short-term impact** to the neighboring community from noise.

After renovation, the use of the buildings would be constrained to the interior of the buildings and the noise levels outside the buildings would be similar to levels in the surrounding environment. After renovation, there would be **no impact** to the neighboring community from noise.

3.9.2.3 No Action Alternative

Under the No Action Alternative, the buildings would remain in place, vacant, and receive a limited amount of façade inspections and repairs. There would be **no impact** from noise under the No Action Alternative.

3.9.3 Mitigation Measures

The following mitigation measures for the Action Alternatives have been identified for noise:

- Demolition or renovation would take place between the hours of 8 a.m. and 8 p.m. in accordance with the Municipal Code of Chicago, Chapter 8-32, Noise and Vibration Control (City of Chicago 2022d).
- Noise monitoring methods would be used during demolition and remodeling.
  - Conduct baseline noise monitoring to document normal ambient conditions.
  - Establish noise monitoring stations at the site perimeter to monitor noise levels and to protect outside receptors and document compliance. Additionally, monitor noise levels inside the site for worker protection.
  - Monitor noise levels real time and send text or email notifications when preset action limits have been exceeded, allowing adjustments to be made.
  - Typically, noise thresholds are established by local codes for general activities and Occupational Safety and Health Administration for worker safety.

  - The Illinois Department of Labor, Division of Occupational Safety and Health (Illinois OSHA) established an action level for onsite workers of 85 dB during an 8-hour time-weighted average. This action level is below the permissible exposure limit established by Illinois OSHA for noise for onsite workers at or above 85 dB over an 8-hour time-weighted average, or peak sound pressure level of 130 dB for impulsive or impact noise. Hearing protection is used when these action levels are reached or exceeded.
  - For receptors, hearing protection is not an option, so the permissible exposure limit established by Illinois OSHA for noise for onsite workers of 85 dB over an 8-hour time-weighted average, or peak sound pressure level of 130 dB for impulsive or impact noise, is a basis but it needs to align with local or state requirements.
- Vibration monitoring methods would be used during demolition and remodeling.
  - Complete baseline monitoring to establish a basis for ambient vibrations.
  - Install vibration monitoring stations to include seismographs. These will monitor real time and will automatically send text or email notifications when preset action limits have been exceeded, allowing adjustments to be made.
  - Conduct a visual assessment of the exterior of the surrounding structures for approximately two blocks in all directions. Where there is visible damage, the building exteriors would be photographed. In addition, a visual assessment from the ground level to as high as visually possible would be conducted.
  - Photograph all roads around the site and truck routes.

3.10 Health and Safety

Human health and safety concerns for the project site are the Dirksen Courthouse security concerns, public safety, and the protection of children.

The previous sections on hazardous material and waste, air quality, and noise are related to specific aspects of human health and safety. This section addresses impacts not already covered in those sections.

3.10.1 Affected Environment

3.10.1.1 Public Safety

The buildings at 202, 214, and 220 South State Street are unoccupied, and although FPS regularly monitors the buildings and has security measures in place to prohibit unauthorized access, vacant buildings can present potential health and safety concerns, such as trespassing, vandalism, and theft. In addition, GSA has erected scaffolding in front of 202, 214, and 220 South State Street, conducted façade inspections and repairs, and performed emergency and miscellaneous repairs to prevent accidental harm to the public.

3.10.1.2 Protection of Children's Health and Safety

Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, requires federal agencies to identify and assess environmental health and safety risks that may disproportionately affect children. Children are especially vulnerable because of higher relative doses of air pollution, their smaller-diameter airways, and more active time spent outdoors and closer to ground-level sources of vehicle exhaust.

Relatively few children live in the Loop. Only 11 percent of Loop residents are under 20 years old, compared with 23 percent in the City and 25 percent in the seven-county region (CMAP 2022e). Additionally, the percentage of children with asthma-related emergencies living near 202, 214, and 220 South State Street is lower than the national average and the City as a whole (Chicago Department of Public Health 2016).

There are no community resources that serve children at 202, 214, and 220 South State Street. There are no residential areas or schools adjacent to the project site. There are three child-service community resources near the project area, including a park, a library, and a daycare center. Pritzker Park is one block south of the project site, but the park does not have play equipment or other amenities geared for children. Two blocks south is the Harold Washington Library Center, which has a children's library and programming for children, and all programs are indoors. S & K's Little Chicks DayCare, Inc., a day-care center, is at 122 South Michigan Avenue, near the intersection with East Adams Street and two blocks east of 202, 214, and 220 South State Street.

3.10.2 Environmental Consequences

This section evaluates the potential impacts related to human health and safety under the Action Alternatives and No Action alternatives. Table 3.10-1 presents impact thresholds for health and safety impacts.

Table 3.10-1. Impact Thresholds for Health and Safety Impacts

Impact	Description
None or Negligible	There would be no impacts or no noticeable impacts to human health and safety.
Minor to Moderate	There would be in impacts to health and safety that could be mitigated with small actions or policy changes.
Significant	There result in impacts to health and safety that would require extensive actions or policy changes.
Quality	Beneficial – would have a positive effect on health and safety. Negative – would have an adverse effect on health and safety.
Duration	Short-term – would occur only during the construction period. Long-term – would continue after the construction period.

3.10.2.1 Alternative A, Demolition

Public Safety

The Demolition Alternative would require temporary lane closures that could disrupt pedestrian movement and along with increase in the generation of noise and air pollutants that may impact the nearby public; however, these impacts would be mitigated during demolition. Construction areas would be fenced, reducing the likelihood of people entering the construction site and encountering safety hazards. Therefore, there would be **negative, minor, short-term impacts** to public safety.

Protection of Children

Demolishing 202, 214, and 220 South State Street would not create disproportionate environmental health or safety risks to children. Construction areas would be fenced, reducing the likelihood of children entering the construction site and encountering safety hazards. A temporary increase in pollutants and noise would be generated.

The Demolition Alternative would have **negative, minor, short-term impacts** to children.

3.10.2.2 Alternative B, Viable Adaptive Reuse

Public Safety

There would be less air pollutants and noise generated under the Viable Adaptive Reuse Alternative compared to the Demolition Alternative. The Viable Adaptive Reuse Alternative would require temporary lane closures that could disrupt pedestrian movement. The site would be secured during renovation to reduce the chance of people entering the site. Therefore, there would be **negative, minor, short-term impacts** to public safety.

Protection of Children

The Viable Adaptive Reuse Alternative would not create disproportionate environmental health or safety risks to children. Viable adaptive reuse of the buildings at 202, 214, and 220 South State Street would have **no impacts** to children.

3.10.2.3 No Action Alternative

Under the No Action Alternative, there would be **negative, moderate, long-term impacts** to health and safety and protection of children related to the presence of deteriorating and vacant buildings in an urban environment.

3.10.3 Mitigation Measures

Mitigation measures to ensure health and safety during demolition or viable adaptive reuse of the buildings at 202, 214, and 220 South State Street may include the following:

- Securing construction site access points.
- Removing contents that could attract opportunistic thieves.
- Continuing maintenance and routine inspection.
- Requiring personal protective equipment such as hard hats and safety glasses during demolition or construction.

3.11 Transportation and Traffic

This section describes existing conditions and the potential impacts to traffic and transportation under the Action Alternatives and the No Action Alternative.

3.11.1 Affected Environment

3.11.1.1 Existing Traffic

GSA conducted a traffic impact analysis using traffic data from online sources, including Getting Around Illinois (2022), supplemented with traffic counts collected at five intersections around the project site in January 2023:[14]

- Dearborn Street and Monroe Street
- Dearborn Street and Adams Street
- South State Street and Adams Street
- Wabash Avenue and Adams Street
- Wabash Avenue and Jackson Boulevard

Traffic counts determined that the high-traffic periods around the project site are from 7 to 9 a.m. and 4 to 6 p.m. While high-traffic periods may take place over multiple hours, peak hours are determined by the single hour within the highest traffic period. The peak morning hour is from 8 to 9 a.m. and the peak evening hour is from 5 to 6 p.m. Table 3.11-1 shows the traffic counts in the area.

Table 3.11-1. Traffic Counts Existing Street Network

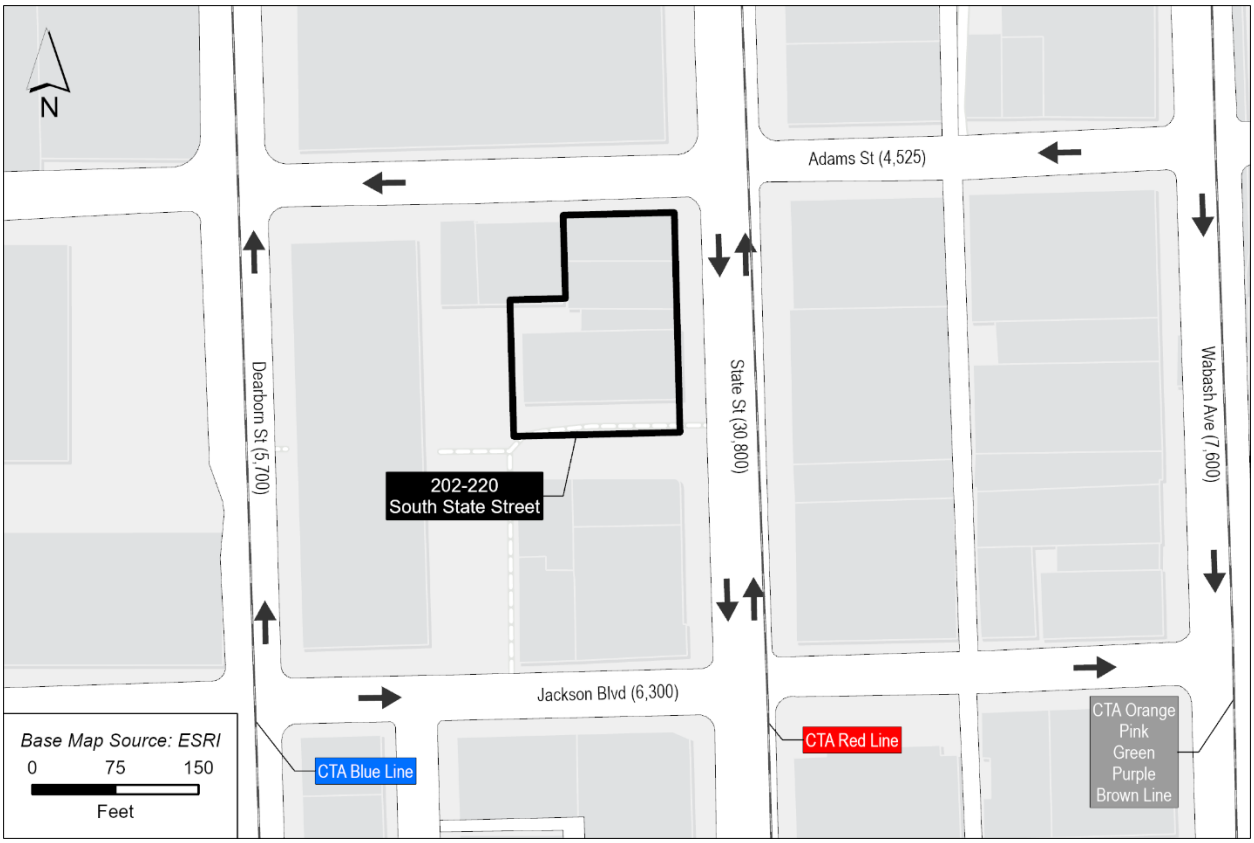
Street Name	Jurisdiction	Vehicles per Day (Year)[a]
Adams St	State of Illinois	4,525 (2021)
Jackson Blvd	State of Illinois	6,300 (2021)
Dearborn St	Chicago	5,700 (2014)
State St	Chicago	30,800 (2018)
Wabash Ave	Chicago	7,600 (2018)

[a] Source: Getting Around Illinois 2022

South State Street is a minor arterial roadway while Adams Street, Jackson Street, Dearborn Street, and Wabash Avenue are all major collectors. Minor arterial is one category above major collector, meaning it is expected to have more traffic. In addition, South State Street is a two-way street and has several bus routes, while Adams Street, Jackson Street, Dearborn Street and Wabash Avenue are one-way streets. The existing street network with traffic counts are shown on Figure 3.11-1.

[14] Traffic counts at the intersection of South State Street and Jackson Boulevard were not counted but inferred from the collected volumes at the intersections of South State Street and Adams Street and at the intersection of Wabash Avenue and Jackson Boulevard. No turns are permitted at South State Street and Jackson Boulevard, so the counts at the adjacent intersections should form an accurate view of the traffic movements at South State Street and Jackson Boulevard.

Figure 3.11-1. Street Network with Traffic Volumes



Traffic congestion is usually measured on a scale of A to F, with Level of Service A being no delay and Level of Service F being congestion so great that drivers wait through more than one cycle of a stop light to get through an intersection (AASHTO 2018). Existing traffic operates up to a Level of Service C (stable flow) during high-traffic periods on all streets surrounding 202, 214, and 220 South State Street. The buildings at 202, 214, and 220 South State Street are vacant and, therefore, do not generate any pedestrian, vehicle, or transit trips.

3.11.1.2 Future Traffic

Traffic on South State Street and Adams Street is expected to increase approximately 0.5 percent annually until 2025 and then increase 0.13 percent annually from 2025 to 2030. The small amount of traffic growth stems from the relatively limited opportunity for new development in the already heavily developed Loop and the high public transportation use in the area (CMAP 2022f).

GSA projected traffic volumes and street capacities by analyzing existing traffic signal data from the Chicago Department of Transportation and using traffic analysis software. Existing traffic signal timings were obtained from the Chicago Department of Transportation and were input into Synchro 11 traffic analysis software along with the 2030 projected turning movement counts. Traffic operations were analyzed in Synchro 11 according to the *Highway Capacity Manual* methodology.

3.11.1.3 Public Transit

The Regional Transportation Authority is responsible for conducting transit planning and financial oversight for CTA, Metra, and Pace. CTA is responsible for operations and planning for subway trains and the bus system that serves the City of Chicago and surrounding suburbs. Metra is responsible for operations and planning for the commuter rail system serving the Northeastern Illinois region. Pace Suburban Bus is responsible for operations and planning for the suburban bus system serving the Northeastern Illinois region.

The Red Line "L" operates under South State Street and the Blue Line "L" operates under Dearborn Street. The Orange Line, Pink Line, Green Line, Brown Line and Purple Line Express are available over and under Wabash Avenue. Pace bus stops run along South State Street, Dearborn Street, Adams Street, and Jackson Street. The nearest Metra station is at 414 South LaSalle Street, approximately one-half mile southeast of 202, 214, and 220 South State Street.

There are four stairwells near the project site that provide access to the Red Line. One stairwell access is directly in front of 220 South State Street in the southbound direction and a second stairwell access is directly across the street along South State Street in the northbound direction. Two adjoining stairwells are located 100 feet south of these stairwells and provide access to southbound and northbound Red Line. The next nearest stairwell locations for the Red Line are approximately 500 feet north and south of 202, 214, and 220 South State Street, including handicap-accessible elevators.

Pace bus stops closest to 202, 214, and 220 South State Street are 200 feet south along southbound State Street and across the street on northbound State Street at the Adams Street intersection.

3.11.2 Environmental Consequences

This section describes the potential impacts related to transportation and traffic under the Action Alternative and No Action Alternative. Table 3.11-2 presents impact thresholds for transportation and traffic.

Table 3.11-2. Impact Thresholds for Traffic and Transportation

Impact	Description
None or Negligible	There would be no change in traffic or transportation resources, or the change would be so small that it would not be noticeable.
Minor	There would be a noticeable change in traffic on the roadway network; however, the change would not exceed roadway capacity or cause delays on the roadway network.
Moderate	There would be a measurable and consequential change in traffic; while some delays may occur, roadway capacity would not be exceeded.
Significant	There would be a substantial change in traffic on the roadway network; noticeable delays would occur, and roadway capacity would be exceeded.
Quality	Beneficial – would have a positive effect on traffic and transit. Negative – would have an adverse effect on traffic and transit.

Impact	Description
Duration	Short term – would occur only during the implementation period (i.e., demolition, adaptive reuse, and/or for a limited adjustment period). Long term – would continue after the implementation period.

3.11.2.1 Alternative A, Demolition

Under the Demolition Alternative, 202, 214, and 220 South State Street would not generate any traffic. Therefore, there would be **no long-term impact** to traffic or transportation under the Demolition Alternative.

To provide a staging area for the demolition contractor, one southbound lane on South State Street and one westbound lane on Adams Street adjacent to the buildings would need to be closed. It is estimated that lane closures could last up to two years. Two lanes of westbound traffic on Adams Street and one to two southbound lanes on South State Street would be open to traffic during demolition (Figure 3.11-2). The exact lane configurations and closure durations are not known yet and would be finalized during the project's design phase.

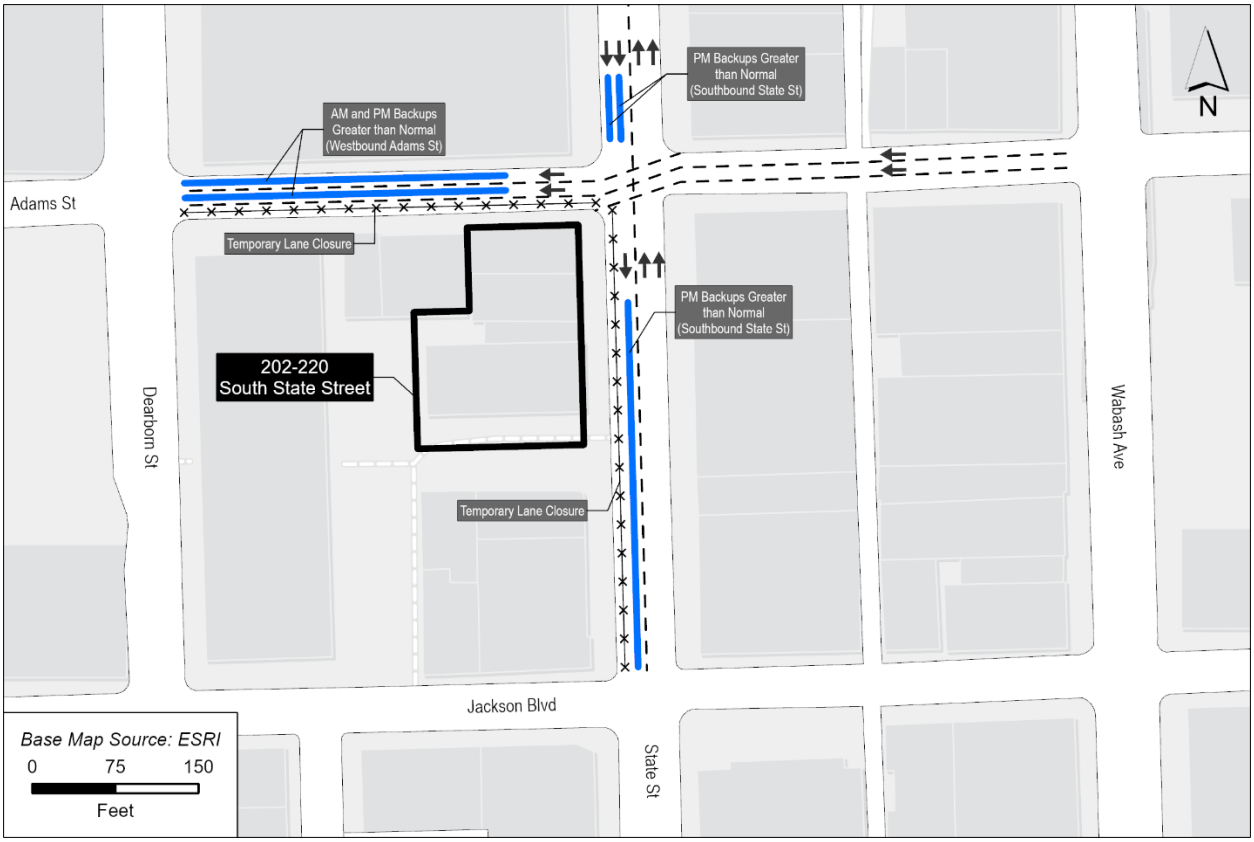
Lane closures during demolition would increase traffic by a small amount and cause additional slight delays. Closing one full lane on southbound South State Street and keeping two lanes open on Adams Street is projected to cause some traffic congestion during high-traffic periods. Adams Street between State and Dearborn is the only segment that would operate lower than existing levels, as it would operate at Level of Service D (approaching unstable flow) during peak periods but is still within acceptable limits (AASHTO 2018). Traffic in the project area would continue to operate at an acceptable level and would not experience excessive backups during lane closures. Thus, lane closures along southbound South State Street and westbound Adams Street would have **negative, minor, short-term impacts** to traffic and transportation from lane closures during demolition.

Debris produced from demolishing the buildings would require approximately 4,000 to 6,000 dump truck trips to transport debris to local landfills. This activity equates to roughly 16 to 30 dump trucks per day on the site during a year of debris removal. Potential routes for construction traffic could be via South State Street and/or Clark Street between Ida B. Wells Drive (formerly Congress Parkway) and the project site. From Ida B. Wells Drive, construction traffic could travel west on the freeway system to surrounding landfills or other sites that accept construction debris. There are no known truck routes or truck restrictions for the transport of demolition debris from 202, 214, and 220 South State Street. Existing roadways are designed to handle loads according to road classification (Chicago Department of Transportation 2019) and no additional wear and tear on roadways surfaces is expected. Construction traffic would cause **negative, minor, short-term impacts** to traffic and transportation.

It may be necessary to temporarily close the Red Line access stairwell or temporarily move the bus stops along southbound South State Street during demolition. If there are temporary impacts to CTA access or facilities, GSA would coordinate with CTA at least 30 days in advance of any impacts. If the Red Line access stairwell in front of 220 South State Street were closed, riders would still be able to access the Red Line via the additional stairwells 500 feet north or south. Additionally, Pace bus stops on South State Street at Adams Street and Jackson Boulevard would remain open during demolition and would not be impacted. There would be **negative, minor, short-term impacts** to transportation and traffic from the temporary closure of the nearby Red Line subway access.

Temporary sidewalk closures on southbound South State Street and Adams Street adjacent to 202, 214, and 220 South State Street would coincide with lane closures during demolition for up to two years. Sidewalks would be open to pedestrians on the east side of South State Street. Therefore, there would be **negative, minor, and short-term impacts** to pedestrian transportation.

Figure 3.11-2. Temporary Lane Closures and Potential Backups



3.11.2.2 Alternative B, Viable Adaptive Reuse

Under the Viable Adaptive Reuse Alternative, there would be an increase of up to 247 additional trips and 124 additional vehicles per day. This assumes the buildings would be fully occupied by office space, which represents the highest traffic-generating scenario. Onsite parking would not be allowed under this alternative so it is assumed adjacent parking garages would be used. The two closest parking garages are at 35 South Dearborn Street (two blocks northwest) and at 97 East Adams Street (two blocks east).

The increase in 124 additional vehicles per day is less than one percent of the existing vehicles per day on South State Street (30,800 vehicles per day). Based on the nominal number of expected new trips generated by potential building occupants, traffic would continue to operate at acceptable levels (Level of Service C) and no excessive backups are expected to occur. Therefore, there would be **negative, negligible, long-term impacts** on transportation and traffic from the new potential occupants.

To provide a staging area for the construction contractors, one southbound lane on South State Street and one westbound lane on Adams Street adjacent to the buildings would need to close for the duration of construction. Two lanes of westbound traffic on Adams Street and one to two southbound lanes on State Street would remain open during construction (Figure 3.11-2). Exact lane configurations and closure durations are not known yet and would be finalized during the project's design phase. The required lane closures during construction would increase traffic by a small amount and cause additional slight delays. Closing one full lane on southbound South State Street and keeping two lanes open on Adams Street is projected to cause some traffic backups during high-traffic periods. Adams Street between State Street and Dearborn Street is the only street segment that would operate lower than existing levels. It would operate at Level of Service D (approaching unstable flow) during peak periods but is still within acceptable limits (AASHTO 2018). Traffic would continue to operate at an acceptable level and would not experience excessive backups during lane closures. Thus, lane closures along southbound South State Street and westbound Adams Street would have **negative, minor, and short-term impacts** on traffic and transportation from lane closures during construction.

Removing construction debris would depend on the type of renovation required. Assuming commercial development would require the most effort, transporting debris would be significantly lower than demolition but would still require daily activity for up to 2 years. However, the street system has plenty of capacity. Construction traffic would likely use the same route as the Demolition Alternative. Construction traffic would cause **negative, minor, short-term impacts** to traffic and transportation.

Temporarily closing the Red Line stairwell in front of 220 South State Street or temporarily moving the bus stops on southbound South State Street may be necessary during renovation. If there are temporary impacts to CTA access or facilities, GSA would coordinate with CTA at least 30 days in advance of any impacts. If the Red Line access stairwell in front of 220 South State Street is closed, riders would still be able to access the Red Line via the stairwells 500 feet north or south. Additionally, Pace bus stops on South State Street at Adams Street and Jackson Boulevard would remain open during construction and would not be impacted. There would be **negative, minor, and short-term impacts** from the temporary closure of the nearby Red Line subway access.

Temporary sidewalk closures on southbound South State Street and Adams Street adjacent to 202, 214, and 220 South State Street would coincide with lane closures during renovation. Sidewalks would be open to pedestrians on the east side of South State Street. Therefore, there would be **negative, minor, and short-term impacts** to pedestrian traffic.

3.11.2.3 No Action Alternative

The No Action Alternative would have **no impact** to transportation and traffic.

3.11.3 Mitigation Measures

To address the long queues resulting from the full lane closures in the Action Alternatives, a potential mitigation would be to limit lane closures on Adams Street and South State Street to less than the full block. Limiting the length of lane closures will shorten traffic backups.

If two southbound lanes need to be maintained on the full block of South State Street, then another potential mitigation measure could be to temporarily shift the two southbound through lanes to the east, using the space currently occupied by the striped median. The northbound left-turn lane at South State Street and Adams Street would need to be removed but preliminary analysis indicates that traffic would operate at acceptable levels.

4. Cumulative Impacts

NEPA requires federal agencies to consider the cumulative environmental effect of their proposed actions. CEQ regulations define cumulative impacts as those potential impacts resulting from "the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions" (40 CFR Section1508.1).

Cumulative impacts may result from individually minor but collectively significant actions taking place over a period of time. For a past, ongoing, or reasonably foreseeable future action to be considered in the cumulative analysis, the incremental impacts of that action and the Action Alternatives must be related in space or time. GSA considered other past, present, and reasonably foreseeable actions if they were of similar character that could affect the same environmental resources within the study area identified for the cumulative impacts. For this analysis, the past, present and reasonably foreseeable future activities include land use development, redevelopment, and building demolition in the Chicago Loop.

GSA characterized the collective impacts of the past, present, and reasonably foreseeable future activities and assessed the incremental contribution of the Action Alternatives to those collective impacts to establish whether the Action Alternatives would have meaningful cumulative impacts. The following steps were used to evaluate actions to include in the cumulative impacts analysis:

- Identifying past, present, and reasonably foreseeable activities that could affect the same resources as the Action Alternatives
- Identifying the impacts associated with the Action Alternatives, which could noticeably increase impacts when combined with other activities
- Determining the potential cumulative impacts to individual resources

4.1 Cumulative Activities

This section identifies past, present, or reasonably foreseeable future activities that could interact with the Action Alternatives and potentially contribute to cumulative impacts. In accordance with CEQ's document *Considering Cumulative Effects Under the National Environmental Policy Act*, identifying other actions affecting the resources, ecosystems, and human communities of concern is a critical step in scoping for cumulative impacts (CEQ 1997b).

Because the Action Alternatives involve either demolition or adaptive reuse of 202, 214, and 220 South State Street, GSA considered past, present, and reasonably foreseeable future actions of similar character (i.e., land use development, redevelopment, and building demolition) in the Chicago Loop. Sections 4.2.1 through 4.2.5 note how these activities potentially contributed to cumulative impacts for each resource discussed.

Table 4-1 lists the projects and includes the project name, location, type (demolition, development, or redevelopment), current status (e.g., conceptual, proposed, approved, under construction, or completed), and brief description.

Figure 4-1 shows the projects' locations. In accordance with CEQ's document *Considering Cumulative Effects Under the National Environmental Policy Act*, "Analyzing cumulative effects . . . requires the analyst to expand the geographic boundaries and extend the time frame to encompass additional effects on the resources, ecosystems, and human communities of concern" (CEQ 1997b). Therefore, the analysis considers past, present, and reasonably foreseeable future activities beyond the direct effects study area.

In addition to the past, present, and reasonably foreseeable future activities listed in Table 4-1 and shown on Figure 4-1, the Great Chicago Fire of 1871 greatly influenced Chicago's development. The fire started on the southwest side of the city and spread north and east into the Loop. The fire destroyed 17,500 buildings. The rebuilding of Chicago began almost immediately. The Great Chicago Fire allowed for the introduction of new, fireproof building materials and technologies in the city's rebuilding. The architectural style that emerged became known as the Commercial style or Chicago school of architecture. In this architectural style, steel was used to provide building support, allowing for larger windows and more natural light, as well as taller buildings (Schons 2022). Cladding was usually terra-cotta. Many of the buildings in the Chicago Loop reflect this architectural style, including the buildings at 202 and 220 South State Street. Building demolitions in the Chicago Loop over the last 100 or so years (as noted in Table 4-1 and shown on Figure 4-1) have contributed to a loss of this iconic architectural style that represents Chicago's developmental history.

Table 4-1. Cumulative Activities

Number	Project Name	Project Location	Project Type	Current Status	Project Description
1	Second City Hall and County Building	Northeast corner of LaSalle and Washington Streets	Demolition	Completed in 1910	This building, constructed in 1885, featured stacks of stone arranged in pillar supports on the ground floor. On the second and third floors, there were huge pillars arranged in pairs. The second City Hall saw many dramatic events, but it had structural problems from the outset and was demolished in 1910. The new City Hall building was constructed next door (Paulett and Floodstrand 2012).
2	Old Chicago Board of Trade	141 West Jackson Boulevard	Demolition	Completed in 1929	Built in 1885, the Chicago Board of Trade was 10 stories high, built from structural steel and Maine granite. It was the first commercial building in Chicago to have electric lighting. It had four elevators and a great hall with a stained-glass skylight. When construction of the Federal Reserve Bank started across the street, it aggravated the foundation of the Board of Trade Building, leading to its demise. The building was demolished in 1929 (Paulett and Floodstrand 2012).
3	Illinois Theater	Jackson Boulevard, between State Street and Wabash Avenue	Demolition	Completed in 1936	Built in 1900, the Illinois Theater seated 1,250 patrons and was considered one of the prime examples of beaux arts architecture. It was three stories high but was not as large or as grand as the other great movie houses and was closed when the Great Depression hit the nation. The building was demolished in 1936, and a parking lot was created in its place (Paulett and Floodstrand 2012).
4	Masonic Temple Building	Corner of State and Randolph Streets	Demolition	Completed in 1939	This building was a skyscraper that opened in 1892 and stood 22 stories high. The design was innovative in many ways. Unfortunately, the elevators were incapable of moving sufficient numbers up to the higher floors, which blighted the rental of the upper building. In addition, when the City began to build the tunnel for the State Street subway, it was too expensive to retrofit the foundation of the Masonic Temple Building. The building was demolished in 1939, and a commercial building was built in its place (Paulett and Floodstrand 2012).
5	Montgomery Ward Headquarters	6 North Michigan Avenue	Partial demolition	Completed in 1947	The first Montgomery Ward headquarters was 12 stories high with a dramatic, two-story arched main floor. Six more floors of offices were in a tower rising up from the main structure, and on top of that was a tall, peaked tower that rose dramatically above the skyline. At the top of the peaked tower was a 22-foot bronze statue that became the complex's signature. When the company moved to River North, it gradually abandoned the Michigan Avenue building. In 1947, the tower became unsafe and was demolished and replaced with a penthouse structure that looked out of place with the rest of the structure (Paulett and Floodstrand 2012).
6	Cable Building	242 South Wabash Avenue	Demolition	Completed in 1960	The 10-story Cable Building was built in 1899. The steel-frame structure had three-part bay windows and was a quintessential example of the Chicago school. The Cable Building was demolished in 1960, despite its status as a Chicago Landmark (Koziarz 2020a).
7	Garrick Theater	64 West Randolph Street	Demolition	Completed in 1961	The Garrick Theater was clad in terra-cotta and one of the tallest buildings in Chicago when complete in 1892. It was replaced by a parking structure after being demolished in 1961 (Koziarz 2020a).
8	Republic Building	209 South State Street	Demolition	Completed in 1961	Built in 1905, the Republic Building was a 19-story commercial structure designed in the Chicago school style (Koziarz 2020a).
9	Chicago Federal Building	Block between Dearborn, Adams, Clark, and Jackson Streets	Demolition	Completed in 1965	The Federal Building was built in 1905 and reached 297 feet high. The building was constructed with a steel frame covered by granite. The roof was covered with vitrified tile, and on the top was a dome covered in glass tiles. The courts relocated to the Dirksen Courthouse, and the Federal Building was demolished in 1965. The U.S. Post Office Loop Station and the Kluczynski Federal Building were erected in its place (Paulett and Floodstrand 2012).

Number	Project Name	Project Location	Project Type	Current Status	Project Description
10	Old Stock Exchange Building	30 North LaSalle Street	Demolition	Completed in 1972	The Chicago Stock Exchange building, constructed in 1893, used a new type of caisson that sank into the ground as the earth inside of them was being removed. This innovation changed the way skyscrapers were built and became standard practice for Chicago buildings. In addition, the Chicago Stock Exchange building had an ornamented entrance arch and gracefully decorated Trading Room with stenciled designs and specially crafted glass. The building was 13 stories high. Two Chicago landmarks commissions offered the building landmark status, but the owners refused because they wanted to raze the building. By the 1960s, the building was judged to be obsolete and in poor repair, and was demolished in 1972 (Paulett and Floodstrand 2012).
11	Sherman House Hotel	North side of Randolph Street, between Clark and LaSalle Streets	Demolition	Completed in 1973	The Sherman House Hotel (first known as the City Hotel) originated before the Chicago fire and was reconstructed several times. By 1925 it consisted of two towers with 17 and 23 stories. The Sherman was an elegant hotel that innovated in music and had a quality restaurant. During the 1950s, the hotel began to fade and was demolished in 1973. The State of Illinois Building (now known as the James R. Thompson Center) was built in its place (Paulett and Floodstrand 2012).
12	Illinois Central Station	135 East 11th Place	Demolition	Completed in 1974	Built in 1893, the Illinois Central Station included a 9-story office building, a 13-story, 225-foot clock tower, and 600-foot-long train shed. It was designated a Chicago Landmark and had Richardsonian Romanesque features, a tunnel-like arch in the center of the building, and impressive interior features such as a grand staircase at the entrance. When Amtrak consolidated service into the newer Union Station, the Illinois Central Station was demolished in 1974 (Paulett and Floodstrand 2012).
13	Old Chicago Mercantile Exchange	130 North Franklin Street	Demolition	Completed in 2003	Built in 1927, the building combined elements of the beaux arts and art deco styles. It was torn down in 2003. It met a required number of the criteria established by the Chicago Landmarks Commission for preliminary landmark status but was not granted that status (Preservation Chicago 2003). Demolishing this building led to the City's adopting a 90-day hold on demolitions for buildings that are rated "red" or "orange" under the CHRS and lack local landmark protection (City of Chicago 2023; Koziarz 2020a).
14	155 North Wacker Drive	155 North Wacker Drive	Demolition	Completed in 2007	This 10-story building was demolished in 2007 (Chicago Data Portal 2023).
15	425 South Wabash Avenue	425 South Wabash Avenue	Demolition	Completed in 2009	This 18-story building was demolished in 2009 (Chicago Data Portal 2023).
16	Riverline and Southbank	Along the Chicago River, between Harrison Street and Roosevelt Road	Development	Under construction; completion date to be determined	This project is developing 14 acres of vacant land along the Chicago River between Harrison Street and Roosevelt Road. The plan includes roughly 3,700 residences spread across eight waterfront towers and blocks of townhouses. It also calls for new commercial retail spaces, a riverwalk, and water taxi stops. So far, two high-rise apartment towers (The Cooper and The Reed), a publicly accessible open space called Southbank Park, and a new riverwalk segment south of Harrison Street have been completed (Koziarz 2020b; Achong 2024).
17	Lakeshore East	Bordered by Wacker Drive to the north, Columbus Drive to the west, Lake Shore Drive to the east, and East Randolph Street to the south	Development	Under construction; completion date to be determined	Lakeshore East is a 28-acre master-planned community that began construction in 2016 and is still undergoing development. The community is mixed use, including residential, commercial, hotel, and retail uses (Koziarz 2020b).
18	Van Buren and Plymouth Court Development	Intersection of Van Buren Street and Plymouth Court	Development	Proposed; construction date to be determined	A vacant, City-owned plot is proposed for an all-affordable 20-story residential high-rise (Quig 2021).
19	Bank of America Tower	110 North Wacker Drive	Redevelopment	Completed in 2020	The former Morton Salt Building was redeveloped as a 55-story commercial office building, the tallest commercial office building completed in Chicago in the past 30 years (Koziarz 2020c).

Number	Project Name	Project Location	Project Type	Current Status	Project Description
20	Thompson Center	100 West Randolph Street	Redevelopment	Under construction; completion date to be determined	Google bought the Thompson Center in 2022 and is redeveloping the building into an office suite for its workers (Bauer 2022). Google plans to maintain the center's iconic 17-story atrium but will replace the façade with a new glass exterior (Mulima 2023).
21	LaSalle Corridor Revitalization	LaSalle Street corridor in the Loop	Redevelopment	Proposed; construction date to be determined	The LaSalle Corridor Revitalization is a City-funded initiative to convert underused office space to residential units, among other goals. Four adaptive reuse proposals consisting of more than 1,000 units of mixed-income housing are being advanced for City financial assistance while two additional proposals continue to be reviewed. Collectively representing more than $525 million in total investments, the projects will repurpose 1.3 million square feet of vacant space, including the creation of more than 300 homes that will be affordable to residents earning an average 60% of the area median income (City of Chicago 2024).
22	State Street High-rise Redevelopment	209-227 South State Street	Redevelopment	Conceptual; construction date to be determined	A private company is selling a currently vacant building, which is being marketed for redevelopment and will most likely be redeveloped as a high-rise residential apartment building. However, there are currently no approved plans (Gallun 2022). This building is the former Woolworth Building and is a contributing element to the Loop Retail Historic District (Tatum 1998).
23	Delaware Building	36 West Randolph Street	Redevelopment	Conceptual; construction date to be determined	The Delaware Building is an 8-story building built in 1875 and is used for offices. The building is a Chicago Landmark and is individually listed on the National Register (Gallun 2019; Sorrel 1973). About 42 percent of the building is occupied, and McDonald's occupies the first two floors. The building is currently for sale, and potential uses for the building include shared office space or micro-apartments (Gallun 2019). This building is not within the Loop Retail Historic District.
24	208-212 South State Street Emergency Demolition	208-212 South State Street	Demolition	Completed 2023	GSA demolished the building due to structural deterioration discovered in a March 2023 condition assessment.

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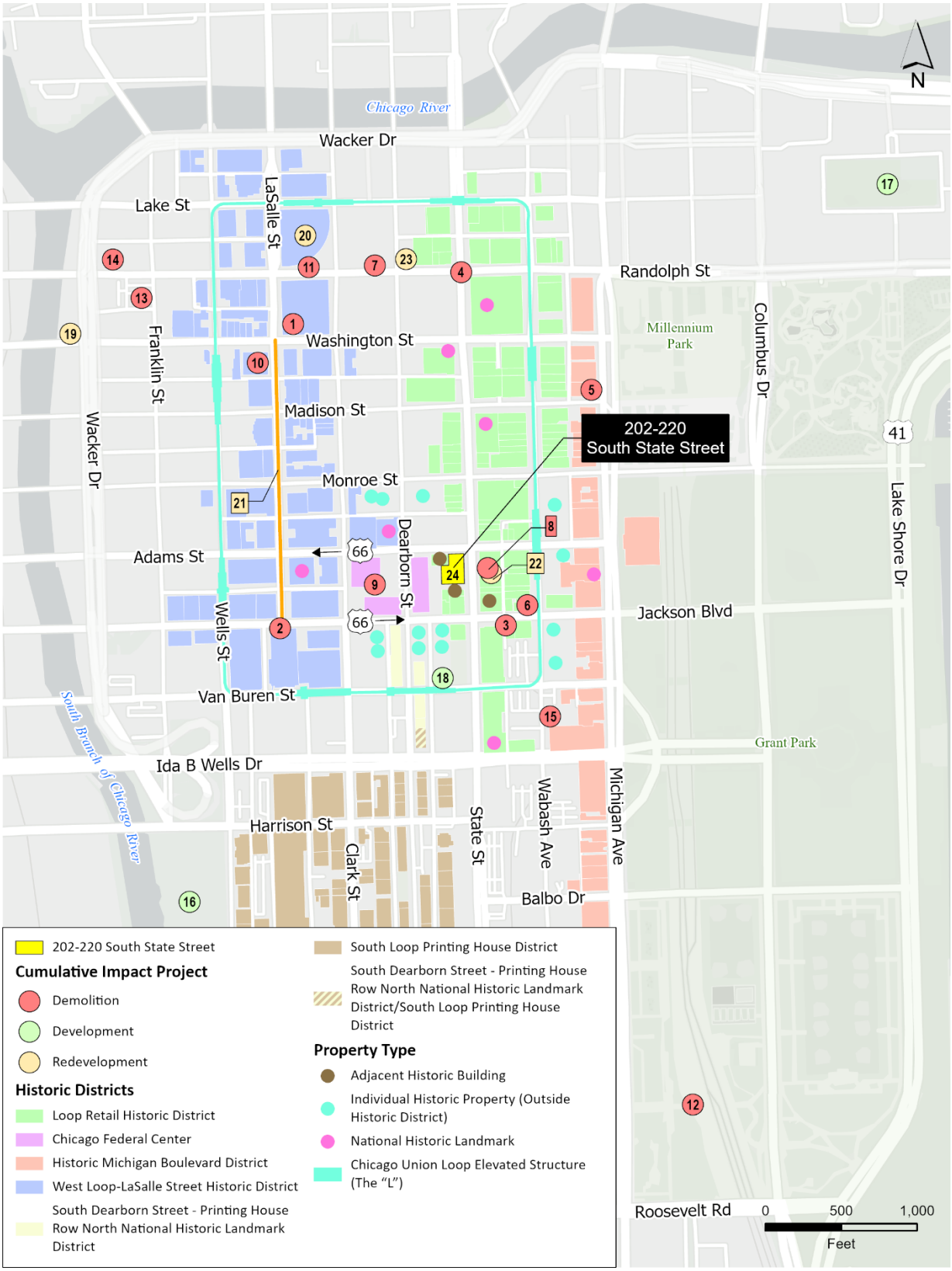
Figure 4-1. Cumulative Impact Projects



4.2 Assessment of Cumulative Impacts

The cumulative analysis evaluates the incremental impacts of the Action Alternatives in conjunction with the potential impacts of the past, present, and reasonably foreseeable future activities in Table 4-1. The following resources have either no impact or negligible impact; therefore, the Action Alternatives could not contribute to a cumulative impact. These resources are as follows:

- Hazardous materials
- Air quality
- Noise
- Health and safety
- Transportation and traffic

CEQ's document *Considering Cumulative Effects Under the National Environmental Policy Act* was used to determine which resource topics to analyze for cumulative impacts. The document states: "In a broad sense, all the impacts on affected resources are probably cumulative; however, the role of the analyst is to narrow the focus of the cumulative effects analysis to important issues of national, regional, or local significance . . . Not all potential cumulative effect issues identified during scoping need to be included in an Environmental Assessment or an EIS. Some may be irrelevant or inconsequential to decisions about the proposed action and alternatives. Cumulative effects analysis should count what counts, not produce superficial analysis of a long laundry list of issues that have little relevance to the effects of the proposed action or eventual decisions" (CEQ 1997b). Resources on which the Action Alternatives would not have an impact, or those for which impacts could be mitigated, are not included in the cumulative impacts analysis.

The following subsections explain the potential cumulative impacts to resources from the Action Alternatives.

4.2.1 Cultural Resources

4.2.1.1 Alternative A, Demolition

Architectural Resources

Loop Retail Historic District

Demolishing 202, 214, and 220 South State Street would remove some of the Loop Retail Historic District's character-defining features. The majority of contributing resources and all of the individually listed properties in the Loop Retail Historic District would remain. The historic district would retain sufficient integrity to convey its historic significance even if 202, 214, and 220 South State Street were demolished. The previous building demolitions within the Loop Retail Historic District boundary prior to 1998, as shown on Figure 4-1, potentially altered the setting, feeling, and association of what is now the historic district, but sufficient historic integrity remained for the district to be listed in 1998. Reasonably foreseeable future activities in the historic district include redeveloping 209-227 South State Street, which could involve demolishing a contributing building and constructing a new high-rise residential building. This could detract from the setting and feeling of the historic district. These past and reasonably foreseeable activities, combined with the Demolition Alternative, could impact the Loop Retail Historic District but would not impede the district from conveying its historic significance. Therefore, based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural

Resources, of this EIS, the Demolition Alternative would have a **negative, moderate cumulative impact** to the Loop Retail Historic District.

Adjacent Contributing Buildings within the Loop Retail Historic District

Removing 202, 214, and 220 South State Street could potentially change the setting of the adjacent contributing buildings in the Loop Retail Historic District. The previous building demolitions within the historic district boundary prior to 1998, as shown on Figure 4-1, potentially altered the setting and feeling of surrounding buildings in what is now the historic district, but sufficient historic integrity remained for the district to be listed with these contributing resources in 1998. Reasonably foreseeable future activities in the historic district include redeveloping 209-227 South State Street, which could detract from the setting and feeling of adjacent contributing buildings in the Loop Retail Historic District. These past and reasonably foreseeable activities, combined with the Demolition Alternative, could affect adjacent contributing buildings in the historic district but would not impede their integrity as contributing elements. Therefore, based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Demolition Alternative would have a **negative, moderate cumulative impact** to adjacent contributing buildings in the Loop Retail Historic District.

Other National Register Historic Districts

Removing 202, 214, and 220 South State Street would cause visual changes that could affect the integrity of setting of the Chicago Federal Center. Effects are expected to be moderate, negative, and long term. No other past, present, or reasonably foreseeable future activities would affect the Chicago Federal Center. Based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Demolition Alternative would have a **negative, moderate cumulative impact** to the Chicago Federal Center.

Removing 202, 214, and 220 South State Street could change the viewshed from the Historic Michigan Boulevard District, West Loop–LaSalle Street Historic District, South Dearborn Street–Printing House Row North National Historic Landmark District, and South Loop Printing House District, but it would not affect their ability to convey their historic significance. Effects are expected to be minor, negative, and long term. The previous building demolitions within or near the historic district boundaries, as shown on Figure 4-1, potentially altered the setting, feeling, and association of what are now the historic districts, but sufficient historic integrity remained for the districts to be listed.[15] Reasonably foreseeable future activities in the West Loop–LaSalle Street Historic District include the Thompson Center redevelopment and LaSalle Corridor Revitalization. The LaSalle Corridor Revitalization will convert underused office space to residential units along LaSalle Street from Washington Street to Jackson Boulevard. This would likely enhance the West Loop–LaSalle Street Historic District by reusing buildings and revitalizing LaSalle Street. The Thompson Center redevelopment would similarly reuse the existing building. The Thompson Center is a noncontributing element to the West Loop–LaSalle Street Historic District. No reasonably foreseeable future activities are within the Historic Michigan Boulevard District, South Dearborn Street–Printing House Row North National Historic Landmark District, or South Loop Printing House District. Past and reasonably foreseeable activities, combined with the Demolition Alternative, could affect the Historic Michigan Boulevard District, West Loop–LaSalle Street Historic District, South Dearborn Street–Printing House Row North National Historic Landmark District, and South Loop Printing House District, but would not impede the districts from conveying their historic significance.

[15] The Historic Michigan Boulevard District was determined eligible for the National Register in 2002; the West Loop–LaSalle Street Historic District was listed in 2013; the South Dearborn Street–Printing House Row North National Historic Landmark District was listed in 1976; and the South Loop Printing House District was listed in 1978.

Therefore, based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Demolition Alternative would have a **negative, minor cumulative impact** to the Historic Michigan Boulevard District, South Dearborn Street–Printing House Row North National Historic Landmark District, South Loop Printing House District, and West Loop–LaSalle Street Historic District.

National Historic Landmarks

Removing 202, 214, and 220 South State Street could potentially change the setting of the NHLs in the surrounding area. The previous building demolitions in the area, as shown on Figure 4-1, potentially altered the setting and feeling of the NHLs, but each of the NHLs retains historic integrity despite these alterations. Reasonably foreseeable future activities in the area could also alter the setting and feeling of the NHLs. The LaSalle Corridor Revitalization would likely enhance the setting and feeling of the Rookery Building NHL at 209 South LaSalle Street by reusing buildings and revitalizing LaSalle Street. These past and reasonably foreseeable activities, combined with the Demolition Alternative, could impact NHLs but would not impede their integrity. Therefore, based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Demolition Alternative would have a **negative, minor cumulative impact** to NHLs.

Historic Properties not within a Historic District

Removing 202, 214, and 220 South State Street could potentially change the setting of the other historic properties not within a historic district in the APE. The previous building demolitions in the area, as shown on Figure 4-1, potentially altered the setting and feeling of these properties, but each retains historic integrity despite these alterations. Reasonably foreseeable future activities include a 20-story all-affordable residential high-rise development at the northeast corner of Van Buren Street and Plymouth Court, which could detract from the setting and feeling of the nearby City Club, Standard Club, Sears Building, the building at 27-33 West Jackson Boulevard, and the "L." These past and reasonably foreseeable activities, combined with the Demolition Alternative, could affect these historic properties but would not impede their integrity. Therefore, based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Demolition Alternative would have a **negative, minor cumulative impact** to historic properties in the APE that are not within a historic district.

Archaeological Resources

There are no known archaeological resources in the APE. If archaeological resources exist within the APE, they could be affected if demolition involves removal of basements or foundations. However, if previously unidentified archaeological resources were discovered during this action, ground-disturbing activities would halt near the find and GSA would consult with the Tribal Historic Preservation Officers, Illinois SHPO, ACHP, and other Consulting Parties, as appropriate, regarding eligibility for listing in the National Register, project impacts, necessary mitigation, or other treatment measures. An unanticipated discovery plan would be in place prior to demolition to address any archaeological resources that might be discovered. Therefore, there would be **no impacts** to archaeological resources under NEPA, no effects to archaeological historic properties under Section 106, and **no cumulative impact**.

4.2.1.2 Alternative B, Viable Adaptive Reuse

Architectural Resources

Loop Retail Historic District

The Viable Adaptive Reuse Alternative would retain and adaptively reuse buildings that contribute to the Loop Retail Historic District. Most of the buildings' key character-defining features would likely remain, and the historic district would retain sufficient integrity to convey its historic significance. Direct effects from adaptive reuse are expected to be beneficial, minor, and long term. The previous building demolitions within the Loop Retail Historic District boundary prior to 1998, as shown on Figure 4-1, potentially altered the setting, feeling, and association of what is now the historic district, but sufficient historic integrity remained for the district to be listed in 1998. Reasonably foreseeable future activities in the historic district include redeveloping 209-227 South State Street, which could detract from the setting and feeling of the historic district if the building is demolished. These past and reasonably foreseeable activities, combined with the Viable Adaptive Reuse Alternative, would not impede the district from conveying its historic significance. Based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Viable Adaptive Reuse Alternative would have a **beneficial, minor cumulative impact** to the Loop Retail Historic District.

Adjacent Contributing Buildings within the Loop Retail Historic District

The Viable Adaptive Reuse Alternative could enhance the setting of the adjacent contributing buildings in the Loop Retail Historic District by rehabilitating the exteriors of 202, 214, and 220 South State Street and returning the buildings to commerce. Effects from adaptive reuse are expected to be beneficial, minor, and long term. The previous building demolitions within the historic district boundary prior to 1998, as shown on Figure 4-1, potentially altered the setting and feeling of surrounding buildings in what is now the historic district, but sufficient historic integrity remained for the district to be listed with these contributing resources in 1998. Reasonably foreseeable future activities in the historic district include redeveloping 209-227 South State Street, which could detract from the setting and feeling of adjacent contributing buildings in the Loop Retail Historic District. Past and reasonably foreseeable activities, combined with the Viable Adaptive Reuse Alternative, would not impede the buildings' integrity as contributing elements. Based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Viable Adaptive Reuse Alternative would have a **beneficial, minor cumulative impact** to adjacent contributing buildings in the Loop Retail Historic District.

Other National Register Historic Districts

The Viable Adaptive Reuse Alternative could enhance the setting of the Chicago Federal Center by rehabilitating the exteriors of 202, 214, and 220 South State Street and returning the buildings to commerce. The effects are expected to be negligible, beneficial, and long term. No other past, present, or reasonably foreseeable future activities would affect the Chicago Federal Center. Based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Viable Adaptive Reuse Alternative would have a **beneficial, negligible cumulative impact** to the Chicago Federal Center.

The Viable Adaptive Reuse Alternative could enhance the setting of the Michigan Boulevard District, West Loop–LaSalle Street Historic District, and South Loop Printing House District by rehabilitating the exteriors of 202, 214, and 220 South State Street and returning the buildings to commerce. The effects are expected to be negligible, beneficial, and long term. The previous building demolitions within the historic district boundaries, as shown on Figure 4-1, potentially

altered the setting, feeling, and association of what are now the historic districts, but sufficient historic integrity remained for the districts to be listed. Reasonably foreseeable future activities in the West Loop–LaSalle Street Historic District include the Thompson Center redevelopment and LaSalle Corridor Revitalization, which would likely enhance the historic district by reusing buildings and revitalizing LaSalle Street. No reasonably foreseeable future activities are within the Historic Michigan Boulevard District or South Loop Printing House District. Past and reasonably foreseeable activities, combined with the Viable Adaptive Reuse Alternative, would not impede the districts from conveying their historic significance. Therefore, based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Viable Adaptive Reuse Alternative would have a **beneficial, negligible cumulative impact** to the Historic Michigan Boulevard District, West Loop–LaSalle Street Historic District, and South Loop Printing House District.

National Historic Landmarks

The Viable Adaptive Reuse Alternative is unlikely to change the setting of the NHLs in the surrounding area. The effects from adaptive reuse are expected to be beneficial, negligible, and long term. The previous building demolitions in the area, as shown on Figure 4-1, potentially altered the setting and feeling of the NHLs, but each of the NHLs retains historic integrity despite these alterations. Reasonably foreseeable future activities in the area could also alter the setting and feeling of the NHLs. The LaSalle Corridor Revitalization would likely enhance the setting and feeling of the Rookery Building NHL at 209 South LaSalle Street by reusing buildings and revitalizing LaSalle Street. These past and reasonably foreseeable activities, combined with the Viable Adaptive Reuse Alternative, would not impede the NHLs' integrity. Based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Viable Adaptive Reuse Alternative would have a **beneficial, negligible cumulative impact** to NHLs.

Historic Properties not within a Historic District

The Viable Adaptive Reuse Alternative is unlikely to change the setting of the other historic properties not within a historic district in the APE. The effects from adaptive reuse are expected to be negligible, beneficial, and long term. The previous building demolitions in the area, as shown on Figure 4-1, potentially altered the setting and feeling of the other historic properties, but each retains historic integrity despite these alterations. Reasonably foreseeable future activities include a 20-story all-affordable residential high-rise development at the northeast corner of Van Buren Street and Plymouth Court, which could detract from the setting and feeling of the nearby City Club (Standard Club), Sears Building, the building at 27-33 West Jackson Boulevard, and the "L." These past and reasonably foreseeable activities, combined with the Viable Adaptive Reuse Alternative, would not impede the other historic properties' integrity. Therefore, based on the impact thresholds defined in Table 3.1-2 of Section 3.1, Cultural Resources, of this EIS, the Viable Adaptive Reuse Alternative would have a **beneficial, negligible cumulative impact** to other historic properties not within a historic district.

Archaeological Resources

There are no known archaeological resources in the APE. If archaeological resources exist within the APE, they could be affected if a viable adaptive reuse alternative involves removing basements or foundations. However, if previously unidentified archaeological resources were discovered during this action, ground-disturbing activities would halt near the find and GSA would consult with the Tribal Historic Preservation Officers, Illinois SHPO, ACHP, and other Consulting Parties, as appropriate, regarding eligibility for listing in the National Register, project impacts, necessary mitigation, or other treatment measures. An unanticipated discovery plan would be in

place prior to ground disturbance to address any archaeological resources that might be discovered. Therefore, there would be **no impacts** to archaeological resources under NEPA, no effects to archaeological historic properties under Section 106, and **no cumulative impact**.

4.2.2 Aesthetic and Visual Resources

4.2.2.1 Alternative A, Demolition

Under the Demolition Alternative, 202, 214, and 220 South State Street would be replaced with a flat, ground-level landscaped plaza. There are other flat green spaces/plazas nearby, such as Millennium Park, Grant Park, Pritzker Park, Federal Plaza, and Daley Plaza. As identified in Table 4-1, since 1910 and as late as 2003, 13 buildings have been demolished in the Loop that had visual features characteristic of the architectural styles of the time that they were constructed. Demolishing these buildings likely affected aesthetic and visual resources in the Loop because most parcels were rebuilt with more modern, sleek buildings. Reasonably foreseeable future redevelopment and development activities could also affect aesthetic and visual resources in the Loop.

Changes to aesthetic and visual resources over time from building demolition, redevelopment, and new development are expected in an ever-advancing major city. Many old buildings characteristic of their time would remain in the Loop mixed among the newer, more modern buildings, as well as public spaces, which form the eclectic, urban character of the Loop. Therefore, although the Demolition Alternative and other past, present, and reasonably foreseeable future activities changed or will change aesthetic and visual resources, these activities are consistent with the aesthetic and visual character of the Loop. 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 **negative, moderate cumulative impact** to aesthetic and visual resources.

4.2.2.2 Alternative B, Viable Adaptive Reuse

The Viable Adaptive Reuse Alternative would have no direct impact to aesthetic and visual resources because the building exteriors of 202, 214, and 220 South State Street would look comparable to today. Therefore, the Viable Adaptive Reuse Alternative would have **no cumulative impact** to aesthetic and visual resources.

4.2.3 Land Use and Zoning

4.2.3.1 Alternative A, Demolition

Demolishing the buildings at 202, 214, and 220 South State Street is not compatible with land use plans in the area, which call for continued retail and mixed use; denser, more walkable areas, sustainable building practices; and reducing waste and reusing materials (Section 3.3, Land Use and Zoning).

Past demolitions listed in Table 4-1 are similarly not compatible with local land use plans. On the other hand, redevelopment and development activities in the Loop are compatible with local land use plans. Based on the impact thresholds defined in Table 3.3-1 of Section 3.3, Land Use and Zoning, of this EIS, the Demolition Alternative would have a potential **minor-to-moderate negative cumulative impact** to land use.

4.2.3.2 Alternative B, Viable Adaptive Reuse

Converting the currently vacant buildings at 202, 214, and 220 South State Street to occupied buildings would be in line with local land use plans, and reuse of the buildings would be generally compatible with City and CMAP plans (Section 3.3, Land Use and Zoning). Local land use plans call for continued retail and mixed use; denser, more walkable areas, sustainable building practices; and reducing waste and reusing materials.

Past demolitions listed in Table 4-1 are not compatible with local land use plans. On the other hand, redevelopment and development activities in the Loop are compatible with local land use plans. Based on the impact thresholds defined in Table 3.3-1 of Section 3.3, Land Use and Zoning, of this EIS, the Viable Adaptive Reuse Alternative would have a potential **minor-to-moderate beneficial cumulative impact** to land use.

4.2.4 Community Facilities

4.2.4.1 Alternative A, Demolition

Under the Demolition Alternative it would be reasonably foreseeable that 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. The space would serve as a meeting place for attendees at court proceedings, accommodate press events and other public gatherings relating to such proceedings, and could be integrated with the space created by demolition, providing more convenient public access to the Dirksen Courthouse. The expanded public area so created would also be available to the public for cultural, educational, and recreational uses as provided for under the Public Buildings Cooperative Use Act (40 U.S.C. Section 3306). Based on the impact thresholds defined in Table 3.4-1 of Section 3.4, Community Facilities, of this EIS, the Demolition Alternative would have a potential **minor-to-moderate beneficial cumulative impact** to community facilities.

4.2.4.2 Alternative B, Viable Adaptive Reuse

If the currently vacant buildings at 202, 214, and 220 South State Street are converted to occupied buildings (i.e., office space), there would be a direct, long-term, moderate benefit to community facilities from new permanent workers and new residents who relocate to the Loop for work.

The past, present, and reasonably foreseeable future activities in Table 4-1 likely similarly benefited or will benefit community facilities by bringing more people who work and live in the Chicago Loop.

Based on the impact thresholds defined in Table 3.4-1 in Section 3.4, Community Facilities, of this EIS, the Viable Adaptive Reuse Alternative would have a **beneficial, moderate cumulative impact** to community facilities.

4.2.5 Socioeconomics

4.2.5.1 Alternative A, Demolition

Economy and Employment

The Demolition Alternative would have only short-term direct benefits to the local economy from additional jobs and increased income flows to businesses during demolition. There would be a lost opportunity for GSA and the City to realize any long-term economic benefits associated with the reuse of the buildings, but the buildings are vacant and not currently generating any economic activity. The Demolition Alternative would not change existing economic conditions long term.

The Demolition Alternative would hinder the Chicago Loop Alliance's effort to revitalize South State Street as a retail destination (Section 3.3, Land Use and Zoning). Past demolitions listed in Table 4-1 may have decreased the local business customer base, thereby reducing the viability of the South State Street retail corridor. On the other hand, redevelopment and development activities in the Loop likely enhanced South State Street as a retail destination. Overall, **no cumulative impact** to the economy, including the South State Street retail corridor, is anticipated.

Heritage Tourism

The Loop Retail Historic District contains 109 buildings: 13 are buildings that were already determined individually eligible for the National Register before the Loop Retail Historic District was added, and 73 are buildings that were deemed to be contributing to the district. Four of the 33 NHLs in Chicago are in the Loop Retail Historic District. Given the limited direct tourism associated with the three buildings at 202, 214, and 220 South State Street, and the large number of remaining National Register–listed buildings, contributing buildings, and NHLs in the Loop Retail Historic District, demolishing 202 and 220 South State Street would be a relatively small direct loss to regional heritage tourism. Past demolitions listed in Table 4-1 may have similarly had a small direct loss to regional heritage tourism, but it is difficult to quantify because data on the number of heritage visitors and fiscal benefit are not separated by building. Based on the impact thresholds defined in Table 3.3-1 in Section 3.3, Land Use and Zoning, of this EIS, the Demolition Alternative would have a **negative, minor cumulative impact** to heritage tourism in the Chicago Loop.

Environmental Justice

The Demolition Alternative would have no direct impact to environmental justice populations and therefore would have **no cumulative impact** when added to the impacts of past, ongoing, and reasonably foreseeable future activities.

4.2.5.2 Alternative B, Viable Adaptive Reuse

Economy and Employment

If 202, 214, and 220 South State Street are adapted for office use,[16] and assuming that the companies occupying the buildings are new to the Loop, there would be direct, long-term economic benefits from employment opportunities and to local businesses due to an enlarged customer base from new permanent workers and new residents (i.e., people who relocate to the Loop for work). This increase in business customers may support the Chicago Loop Alliance's effort to revitalize South State Street as a retail destination.

The past, present, and reasonably foreseeable future activities in Table 4-1 likely similarly benefited or will benefit the economy by bringing new economic activity to the area both temporarily (construction) and permanently (new jobs from retail/hotel uses). These activities would also bring an enlarged customer base for local businesses, first from construction workers and then from the new permanent working and resident population, and may support the Chicago Loop Alliance's effort to revitalize South State Street as a retail destination.

Based on the impact thresholds defined in Table 3.3-1 in Section 3.3, Land Use and Zoning, of this EIS, the Viable Adaptive Reuse Alternative would have a **beneficial, moderate cumulative impact** to the economy, including the South State Street retail corridor, along with other past, present, and reasonably foreseeable future activities.

Heritage Tourism

The Viable Adaptive Reuse Alternative would retain 202 and 220 South State Street and is not anticipated to remove key character-defining features; therefore, **no cumulative impact** to heritage tourism is anticipated.

Environmental Justice

The Viable Adaptive Reuse Alternative would have no direct impact to environmental justice populations and therefore would have **no cumulative impact** when added to the impacts of past, ongoing, and reasonably foreseeable future activities.

4.2.6 Greenhouse Gas Emissions

4.2.6.1 Alternative A, Demolition

The past, present, and reasonably foreseeable future activities listed in Table 4-1 produced, or will produce, GHG emissions from direct sources such as fuel combustion and indirect sources such as construction worker commuting, waste transport, waste disposal, electricity consumption, upstream fuel and energy related activities, materials for backfilling, grading, and landscaping.

Demolishing 202, 214, and 220 South State Street would produce about 7,000 tonnes of carbon dioxide. Minimal long-term GHG emissions would occur after demolition. In 2019, Cook County, which includes the City of Chicago, accounted for more than half of the region's total emissions, equating to 55.6 million metric tonnes of carbon dioxide equivalent (CMAP 2022d). Overall, demolishing the three buildings at 202, 214, and 220 South State Street would increase

[16] For analyzing the long-term impacts of the Viable Adaptive Reuse Alternative on the economy, GSA assumed that 202, 214, and 220 South State Street would be adapted for office use. This assumption was made because office use would produce the most revenue from an economic activity standpoint.

Cook County's GHG emissions by approximately 0.01 percent. Based on the impact thresholds defined in Table 3.6-2 of Section 3.6, Greenhouse Gas Emissions, the Demolition Alternative would have a **negative, minor, cumulative impact** to GHG emissions in combination with past, present, and reasonably foreseeable future activities.

4.2.6.2 Alternative B, Viable Adaptive Reuse

Viable adaptive reuse of 202, 214, and 220 South State Street would produce a combined total of about 8,000 tonnes of carbon dioxide. Long-term operational emissions would be 72,000 tonnes of carbon dioxide through 2050, equating to 2,700 tonnes of carbon dioxide equivalent annually for 27 years. Overall, viable adaptive reuse of the three buildings would increase Cook County's GHG emissions by roughly 0.015 percent in the short term and nearly zero over the long term.

The past, present, and reasonably foreseeable future activities listed in Table 4-1 produced, or will produce, GHG emissions from direct sources and indirect sources. Based on the impact thresholds defined in Table 3.6-2 of Section 3.6, Greenhouse Gas Emissions, of this EIS, the Viable Adaptive Reuse Alternative would have a **negative, minor, cumulative impact** to GHG emissions in combination with past, present, and reasonably foreseeable future activities.

4.2.7 Waste

4.2.7.1 Alternative A, Demolition

Past demolitions that occurred in the Loop, listed in Table 4-1, generated debris that was transported to Chicago-area landfills. The amount of debris and where it was transported is unknown. Similarly, ongoing and reasonably foreseeable future activities will also generate debris that is transported to Chicago-area landfills. Demolishing 202, 214, and 220 South State Street would generate an estimated 58,000 cubic yards of debris. According to the Illinois Environmental Protection Agency, the four landfills in the Chicago area have 25 million cubic yards of capacity, enough for 8 years at recent waste generation levels (Illinois Environmental Protection Agency 2022). The debris generated by demolishing the buildings is 0.24 percent of the Chicago-area landfill capacity. Based on the impact thresholds defined in Table 3.7-2 of Section 3.7, Hazardous Materials and Solid Waste, of this EIS, the Demolition Alternative would have a **negative, minor, cumulative impact** to landfill capacity in the Chicago area in combination with past, present, and reasonably foreseeable future activities. The increase in waste would not exceed the capacity of local landfills.

4.2.7.2 Alternative B, Viable Adaptive Reuse

GSA did not calculate the construction debris that would be generated under the Viable Adaptive Reuse Alternative because the specific use of the buildings is not currently known. However, it would be less than the debris generated by the Demolition Alternative and within the capacity of local landfills. Therefore, based on the impact thresholds defined in Table 3.7-2 of Section 3.7, Hazardous Materials and Solid Waste, of this EIS, the Viable Adaptive Reuse Alternative would have a **negative, minor-to-moderate cumulative impact** to landfill capacity in the Chicago area in combination with other past, present, and reasonably foreseeable future activities.

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6. Distribution List

6.1 Elected Officials

6.1.1 Federal

The Honorable Richard Durbin
U.S. Senate
711 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Tammy Duckworth
U.S. Senate
524 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Danny Davis
U.S. House of Representatives
2159 Rayburn House Office Building
Washington, D.C. 20515

6.1.2 State of Illinois

Governor JB Pritzker
Office of the Governor
555 W. Monroe Street, 16th Floor
Chicago, IL 60661

The Honorable Don Harmon, President of the Senate
Illinois State Senate
309 G Capitol Building
Springfield, IL 62706

The Honorable Kimberly Lightford, Majority Leader
Illinois State Senate
309 H Capitol Building
Springfield, IL 62706

The Honorable Bill Cunningham, President Pro Tempore
Illinois State Senate
309 J Capitol Building
Springfield, IL 62706

The Honorable Mattie Hunter
Illinois State Senate
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Rep. Sonya M. Harper
Illinois State House of Representatives
5222 S. Halsted St.
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Rep. Emanuel "Chris" Welch, Speaker
Illinois State House of Representatives
300 State House
Springfield, Illinois

Rep. Robyn Gabel, Majority Leader
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6.1.3 City of Chicago

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Alderman William Conway
Ward 34 Office
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6.2 Federal Agencies

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6.3 State Agencies

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Commission on Chicago Landmarks
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Dijana Cuvalo, AIA
CCL-Historic Preservation Division, Bureau of Citywide Systems and Historic Preservation
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Commission on Chicago Landmarks
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Tom Carney, Commissioner
Chicago Department of Transportation
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6.5 Native American Tribes

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Tiauna Carnes, Chairperson
Sac and Fox Nation of Missouri
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Reserve, KS 66434

6.6 Section 106 Consulting Parties

Refer to Appendix B.3.

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7. List of Preparers

The GSA staff and contractors responsible for preparing this report are listed in Table 7-1.

Table 7-1. List of Preparers

Name	Role	Education	Years of Experience
GSA			
Joseph Mulligan	GSA Region 5 Project Manager	B.A., Political Science	17 years
Michael Gonczar	GSA Region 5 NEPA Program Manager	B.S., Environmental Science and Policy	6 years
Regina Nally	GSA Region 5 Historic Preservation Officer	M.S., Historic Preservation; B.S., Design	30 years
Sherry N. DeFreece Emery	GSA Region 5 Preservation Architect	Master of Architecture; M.S., Historic Preservation; B.A., Art History	20 years
Jacobs			
Charlie Webb	Project Manager	M.S., Urban and Regional Planning; B.S., Management Systems	30 years
Michelle Rau	Principal and Senior NEPA Technical Consultant	M.S., Business Administration; B.S., Ecology and Evolutionary Biology	25 years
Lori Price	Senior Architectural History Consultant	M.F.A., Historic Preservation; B.A., English and Political Science	30 years
Emily Gulick	NEPA Task Lead	B.A., Environmental Studies; B.A., Geography	5 years
Victoria Stoodley	Public Engagement and NEPA	M.Res., Wildlife Conservation; B.S., Environmental Science	5 years
Carla Mykytiuk	Public Engagement Task Lead	B.S., Psychology/Sociology	20 years
Fatuma Yusuf	Socioeconomics	B.S., Range Management; M.A., Agricultural Economics; M.S., Statistics; Ph.D., Agricultural Economics	25 years
Marc Morgan	Land Use, Community Facilities, Traffic and Transportation	B.A., Geography; A.A., Civil Engineering;	15 years
Carly Paluszek, AICP	Cumulative effects and socioeconomics	M.A., Sustainable Urban Development; B.S., Environmental Geoscience	6 years
Sarah Jarzombek	NEPA Support	B.S., Wildlife and Fisheries	1 year

Name	Role	Education	Years of Experience
Jim Loper	Structural Engineer	B.S., Civil Engineering; M.S., Civil Engineering; M.S., Business Administration	34 years
Scott Almond	Demolition Expert	B.S., Mechanical Engineering	33 years
Keith Dewey, AICP	Aesthetic and Visual	B.A., Geography; Certificate Land Use and Environmental Planning	28 years
Betsi Phoebus	Aesthetic and Visual	M.S., Environmental Planning; B.A., History	22 years
John Harlow	Air Quality	B.S., Chemical Engineering	5 years
Loren Lund	Air Quality	Ph.D., Biochemistry; B.S., Chemistry	31 years
Christina McDonough	Noise	M.S., Environmental Engineering; B.S., Civil Engineering	26 years
Laura Dreher	Traffic and Transportation	B.S., Civil Engineering	21 years
Karen Sanders	Lead Editor	J.D., Law; B.A., Anthropology	25 years
John Wirtz	Senior Traffic Engineer	M.B.A., Finance and Management & Strategy; B.S., Civil Engineering	16 years
Craig Jakobsen	Traffic Engineer	M.S., Transportation Engineering; B.S., Civil Engineering	10 years
David Klatt	Hazardous Material	B.A., Public Administration/Political Science	33 years
Glenn Maxeiner	Hazardous Material	M.S., Geology; B.A., Environmental Studies	22 years