

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION AND
THE ILLINOIS STATE HISTORIC PRESERVATION OFFICER
REGARDING THE
118 N. CLARK STREET PEDWAY IMPROVEMENT PROJECT, CHICAGO,
COOK COUNTY, ILLINOIS
(SHPO LOG #015101024)**

WHEREAS, the Cook County Department of Transportation and Highways (CCDoTH) may utilize funds administered by the Federal Transit Administration (FTA), under 49 U.S.C. Chapter 53, for the 118 N. Clark Street Pedway Improvement Project, Chicago, Cook County, Illinois (Project), and the FTA has determined that the Project is an undertaking subject to review under Section 106 of the National Historic Preservation Act of 1966 (54 United States Code [U.S.C.] § 306108) (NHPA), as amended, and its implementing regulations at 36 Code of Federal Regulations [CFR] Part 800 (hereinafter collectively referred to as Section 106); and

WHEREAS, the Project consists of renovating portions of the existing basement level of the City Hall-County Building to connect three (3) discontinuous segments of the Chicago Loop Pedway system and create a continuous footpath; and

WHEREAS, the Illinois State Historic Preservation Office a Division of and currently residing within the Illinois Department of Natural Resources (IDNR) (Office) pursuant to the NHPA, and the Director of IDNR is the duly designated State Historic Preservation Officer (SHPO); and

WHEREAS, pursuant to 36 CFR § 800.3(c)(3), the FTA initiated consultation with the SHPO; and

WHEREAS, pursuant to 36 CFR § 800.2(c), the FTA has consulted with the SHPO and consulting parties listed in Attachment A (Consulting Parties), and the FTA has invited these Consulting Parties to sign this Memorandum of Agreement (MOA) as a Concurring Party or an Invited Signatory, as such terms are defined in 36 CFR § 800.6(c); and

WHEREAS, pursuant to 36 CFR § 800.2(c)(2)(ii), upon initiation of the Section 106 consultation for the Project, on March 21, 2025, the FTA notified the following Tribes and invited their participation in consultation for the Project: Citizen Potawatomi Nation, Oklahoma; Forest County Potawatomi Community, Wisconsin; Hannahville Indian Community, Michigan; Kickapoo Tribe of Oklahoma; Little Traverse Bay Bands of Odawa Indians, Michigan; Menominee Indian Tribe of Wisconsin; Miami Tribe of Oklahoma; Prairie Band Potawatomi Nation; and

WHEREAS, the Forest County Potawatomi Community, Wisconsin accepted the invitation to participate as a Consulting Party; and

WHEREAS, pursuant to 36 CFR § 800.4(a)(1), the FTA, in consultation with the SHPO and other Consulting Parties, has defined the Area of Potential Effects (APE) for the Project as documented in Attachment B to this MOA and the SHPO concurred with the APE in a letter dated February 11, 2025; and

WHEREAS, pursuant to 36 CFR § 800.4(c), the FTA, through file searches, cultural resources surveys, and consultation with the SHPO and other Consulting Parties, identified and evaluated three (3) historic properties, which are properties that have been determined eligible for or listed in the National Register of Historic Places (NRHP), and indicated in Attachment B; and

WHEREAS, pursuant to 36 CFR § 800.5 and in consultation with the SHPO and other Consulting Parties, the FTA has determined that the Project will have an adverse effect on one (1) historic property: NRHP-eligible Chicago Central Loop Pedway System, and that the Project would have no effect or no adverse effect on the other two (2) historic properties in the APE. The SHPO concurred with this determination in letter dated September 25, 2025; and

WHEREAS, pursuant to 36 CFR § 800.6(a) and in consultation with the SHPO and other Consulting Parties, the FTA has considered ways to avoid, minimize and/or mitigate adverse effects; and agreed upon measures for mitigating the identified adverse effects on the NRHP-eligible Chicago Central Loop Pedway System, as outlined in this MOA; and

WHEREAS, a Consulting Parties meeting was held with responding/interested and participating consulting parties on July 21, 2025, with the FTA, the CCDoTH, the SHPO, and Preservation Chicago, where details of the Project were provided for review and comment; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), the FTA notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination and intention to enter into a MOA on October 9, 2025, and

WHEREAS, the ACHP did not respond to the notification from FTA within fifteen (15) days, per 36 CFR § 800(a)(1)(iii), and pursuant to 36 CFR § 800.6(a)(1)(iv), will not participate in the consultation of this MOA; and

WHEREAS, a Consulting Parties meeting with responding/interested and participating consulting parties was held on November 11, 2025, with the FTA, the CCDoTH, the SHPO, and Preservation Chicago, where measures to avoid, minimize, and mitigate adverse effects were discussed; and

WHEREAS, the SHPO is a Signatory to this MOA because the Project will have an adverse effect on a historic property; and

WHEREAS, the CCDoTH, as the Project sponsor, will have roles and responsibilities in the implementation of this MOA, has participated in consultation, and has been invited by the FTA to sign this MOA as an Invited Signatory; and

WHEREAS, any Invited Signatory, FTA, or the SHPO shall be referred to herein, individually, as a Signatory, and collectively, as the Signatories; and

WHEREAS, Consulting Parties are invited to sign this MOA as Concurring Parties, and these Consulting Parties may accept the invitation to become a Concurring Party by signing this MOA; and

NOW, THEREFORE, the FTA and the SHPO agree that the Project will be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The FTA, in coordination with the CCDoTH, will ensure the following measures are carried out:

I. APPLICABILITY

- A. If the CCDoTH applies for additional federal funding or approvals for the Project from a federal agency that is not party to this MOA, the federal agency may remain individually responsible for their undertaking under 36 CFR Part 800. Alternatively, if the undertaking as described herein remains unchanged, such agency may request in writing to the FTA and the SHPO, their desire to designate the FTA as lead federal agency for the undertaking pursuant to 36 CFR § 800.2(a)(2) and to become a Consulting Party and Invited Signatory to this MOA pursuant to Paragraph B of this Stipulation I.
- B. If during the implementation of this MOA, the FTA identifies other agencies, tribes, individuals, and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the Project or affected properties, or due to their concern with the Project's effects on historic properties, the FTA may offer such entities Consulting Party status pursuant to 36 CFR § 800.2(c) and/or invite them to become an Invited Signatory or Concurring Party to this MOA, with notification to the other Signatory(ies) and Consulting Parties.
 - 1. If the FTA invites an entity to become an Invited Signatory, the party may accept this status by agreeing in writing to the terms of this MOA and so notifying the FTA. If the entity agrees to become an Invited Signatory, and the FTA and the SHPO have no objections, the FTA will follow Stipulation IX to amend this MOA.
 - 2. If the FTA invites an entity to become a Concurring Party, the entity may accept this status by agreeing in writing to the terms of this MOA and so notifying the FTA. Because Concurring Parties have no responsibility for implementation of this MOA, the FTA may add such parties to the consultation process without formal amendment of this MOA. The FTA will notify the Signatory(ies) and Consulting Parties of any entities who agree to become a Concurring Party.

II. HIRING STANDARDS

- A. The FTA will ensure all activities carried out pursuant to this MOA are performed by or under the direct supervision of historic preservation professional(s) who meet the Secretary of the Interior's (SOI) Professional Qualification Standards (48 Fed. Reg. §§ 44738-44739, September 29, 1983) in the appropriate field(s) for the activity (hereinafter referred to as "SOI-Qualified Professional").

The CCDoTH will employ or contract with SOI-Qualified Professional(s) (hereafter, referred to as the "Preservation Lead") to advise the CCDoTH in implementing this MOA and to assist the FTA, as required.

- B. The FTA and the CCDoTH will ensure that in the instance of other allied professions not covered by the SOI Professional Qualification Standards, they will meet other nationally recognized standards or licensure/certification requirements for the profession, as applicable. Whenever

possible, individuals in allied professions should have a minimum of five (5) years of experience working with historic properties.

III. MITIGATION MEASURES TO AVOID, MINIMIZE, AND RESOLVE ADVERSE EFFECTS

A. Historic Inventory and Evaluation

1. The purpose of the Historic Inventory and Evaluation is to identify, document, and evaluate the segments of the NRHP-Eligible Chicago Loop Pedway system located along the Main Stem for contributing or noncontributing NRHP status to the overall linear historic resource.
2. The Main Stem of the Pedway system is defined as the east-west alignment generally bound by Randolph Street to the north, Michigan Avenue to the east, Monroe Street to the south, and La Salle Street to the west. Only the segments of the Pedway system that form part of the Main Stem shall be included in the Historic Inventory and Evaluation. (Refer to the map in Attachment C which identifies the Main Stem of the Pedway). A segment is defined by its period of construction.
3. Prior to initiating fieldwork, the Preservation Lead shall develop an inventory form that includes, at a minimum, locational information, construction date, architectural style, narrative description and historic context, information about historic integrity, NRHP evaluation, references, and areas for photographs and location maps.
 - a. The Preservation Lead shall submit the inventory form to the SHPO for a review and comment period extending thirty (30) days. Comments received from the SHPO shall be incorporated prior to initiating fieldwork. If the SHPO fails to respond within thirty (30) days of receipt of a request for review, the Preservation Lead may proceed to the next step in the process.
4. Fieldwork must take place before the Project may commence. During fieldwork, the Preservation Lead shall take high-resolution photographs and record written notes about condition, alterations, and character-defining features, as applicable.
5. The Preservation Lead shall prepare inventory forms for each segment of the Main Stem of the Pedway system. The inventory forms shall be compiled under a cover letter summarizing the methods and results of the inventory.
6. Draft Submission
 - a. The Preservation Lead shall submit the Draft Historic Inventory and Evaluation in PDF format to the SHPO for a review and comment period extending thirty (30) days. Comments received from the SHPO shall be incorporated as appropriate. If the SHPO fails to respond within thirty (30) days of receipt of a request for review, the Preservation Lead may proceed to the next step in the process.
 - b. Comments received from the SHPO shall be incorporated into the Final Historic Inventory and Evaluation by the Preservation Lead.

7. Final Submission

- a. The Preservation Lead shall submit the Final Historic Inventory and Evaluation in PDF format to the SHPO for inclusion on the SHPO's website.

B. Interpretive Panel Design and Installation

1. The CCDoTH, with the assistance of their Preservation Lead, shall design and install an interpretative panel within the CCDoTH-owned portion of the Pedway at 118 N. Clark Street.
 - a. At minimum, the panel's contents shall include narrative covering the significant architectural and transportation associations of the Main Stem of the Pedway and graphics such as historic photographs, maps, and renderings.
 - b. The CCDoTH and the Preservation Lead shall submit a draft panel design to the FTA for review. If the FTA determines that the draft interpretive panel is sufficient, the FTA shall submit the draft panel design to the SHPO. The SHPO shall have thirty (30) calendar days to provide comments on the draft interpretive panel.
 - c. The CCDoTH and the Preservation Lead shall incorporate any comments received by the SHPO. The CCDoTH and the Preservation Lead shall submit the draft panel design to the FTA for approval. If the FTA approves the final interpretive panel design, the FTA shall submit the final panel design to the SHPO. The SHPO shall have thirty (30) calendar days to review and concur with the final interpretive panel. If the SHPO does not concur, it shall provide comments to the FTA concerning the grounds for the SHPO's disagreement with the interpretive element. Upon receiving such comments, the FTA shall consult with the SHPO to resolve the disagreement in accordance with Stipulation VIII of this Agreement.
 - d. In coordination with Project implementation, the CCDoTH shall manufacture and install the approved interpretive panel within the CCDoTH-owned portion of the Pedway at 118 N. Clark Street.
2. The CCDoTH and the Preservation Lead shall submit the final graphic of the panel and the text in a digitally searchable format to the SHPO. The SHPO shall host the digital file on the SHPO's Cultural Resource Documentation webpage:
<https://dnrhistoric.illinois.gov/preserve/recordation.html>.

IV. DURATION

- A. This MOA will expire in ten (10) years from the date of its execution. Prior to expiration, the FTA may consult with other Signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation IX.

V. MONITORING AND REPORTING

- A. Nothing in this MOA shall be construed as meaning that the FTA cannot request the advice or assistance of the SHPO at any time.

- B. Each year following the date of the execution of this MOA until it expires or is terminated, the CCDoTH will provide the FTA, Signatories, and Consulting Parties with a summary report detailing the work undertaken throughout the previous year pursuant to the stipulations of this MOA. The last report will be submitted within three (3) months of completion of construction of the Project or at completion of this MOA's terms, if later.
- C. Each summary report will include an itemized listing of all measures required to implement the terms of this MOA. For each action, the report will identify what steps the CCDoTH has taken during the reporting period to implement those actions and identify any problems or unexpected issues encountered, any scheduling changes proposed, any disputes and objections submitted or resolved, and any changes recommended in implementation of this MOA. Each summary report will also include a timetable of activities proposed for implementation within the following reporting period.

VI. POST-REVIEW DISCOVERIES

- A. If, after construction has commenced, the FTA and the CCDoTH determine that the Project activities will affect a previously unidentified archaeological and/or architectural resource that may be eligible for the NRHP or affect a known historic property in an unanticipated manner, the FTA will address the discovery or unanticipated effect in accordance with 36 CFR § 800.13, as outlined in the process below. The FTA, at its discretion, may assume any unanticipated discovered property to be eligible for inclusion in the NRHP, pursuant to 36 CFR§ 800.13(c). If human remains or archaeological sites are inadvertently discovered, or unanticipated effects on historic properties are found, then the CCDoTH will implement the following procedures:
 - 1. Upon encountering possible human remains or an unmarked human burial during ground disturbing construction activities, the CCDoTH will ensure that the construction contractor immediately stops work within a one-hundred (100)-foot radius from the point of discovery, leave all uncovered materials in place, cease any further disturbance, take all appropriate steps to secure the site and protect the remains. The remains will be covered and protected in place in such a way as to minimize further exposure of or damage to the remains.
 - 2. The FTA, in coordination with the CCDoTH, shall notify local law enforcement and the appropriate county coroner within one (1) business day of the discovery. The coroner will determine if the remains are human. If the remains are not human, the CCDoTH shall immediately notify the FTA of the discovery and prepare an initial description of the material or resource and submit to the FTA, who will review and provide notification, including the initial description, to the SHPO and Tribes with ancestral and/or cultural affiliations with the location within one (1) business day of receiving the description from the CCDoTH. The following will then take place:
 - a. The FTA will consider any comments received from the Tribe(s), appropriate consulting parties, and the SHPO regarding the material or resource. If no response is

received from the Tribe(s) or the SHPO within two (2) business days of notification, the FTA will continue to follow the steps in Stipulation VI.

- b. If the FTA determines, through consultation with the SHPO and Tribes, as appropriate, that the material or resource does not have religious and cultural significance to Tribes and is not eligible for listing in the NRHP, the FTA shall document the determination and provide the SHPO and Tribes two (2) business days to provide comments on the FTA's determination. Following the two (2) business-day comment period, the FTA shall take comments into consideration and determine to continue consultation or to notify the CCDoTH that construction may resume in the area of the material or resource.
- c. If the FTA determines through consultation with the SHPO and Tribes, as appropriate, the material or resource may be of religious and cultural significance to a Tribe, the FTA will continue Tribal consultation and request the Tribe(s)'s assistance in determining the proper treatment of the material or resource and whether NRHP evaluation is appropriate. A site visit for the Tribe(s) will be coordinated by the FTA with the assistance of the CCDoTH upon request of the SHPO or Tribe(s), as applicable. Following any site visit, the FTA will determine, in consultation with the Tribe(s), the proper course of treatment and, if applicable, the NRHP eligibility of the material or resource. The determination will be documented in a memo via email to the Tribe(s) and the SHPO unless the Tribe(s) requests an alternate method. Any communication with other appropriate consulting parties and/or the public regarding Tribal materials or resources shall be protected from disclosure to the greatest extent permitted by law, including conformance to Section 304 of the NHPA, as amended, and Section 9 of the Archaeological Resource Protection Act, and Executive Order on Indian Sacred Sites, No. 13007, 61 Fed. Reg. 26771 (May 29, 1996).
- d. If the FTA determines through consultation with the SHPO and Tribe(s), as appropriate, that the material or resource is not of religious and cultural significance to Tribes but is eligible for listing in the NRHP, the FTA shall, in consultation with the SHPO, make a finding of effect.
 - i. If the effect is not adverse, the FTA shall notify the SHPO, Tribe(s), and the CCDoTH that construction may resume in the area of the material or resource.
 - ii. If the effect is adverse, the FTA shall consult with the SHPO and Tribe(s) to resolve the adverse effects by altering project plans so that adverse effects to the material or resource are avoided and the material or resource are preserved in place, if possible. If adverse effects to the material or resource cannot be avoided, the FTA will consult with the SHPO and Tribe(s) to either minimize or mitigate the adverse effect.
- e. When adverse effects to a property of religious and cultural significance to a Tribe(s) and/or to a material or resource that has been determined NRHP eligible cannot be avoided, consultation among the FTA, the SHPO, appropriate consulting parties, and

the Tribe(s), as applicable, will occur to minimize or mitigate the adverse effects. The FTA shall take into account the views of the Tribe(s), if provided, prior to approving measures to mitigate adverse effects to properties of religious and cultural significance to Tribes.

The FTA will prepare a mitigation plan. The mitigation plan must identify measures to minimize or mitigate the adverse effects and identify any necessary qualifications, expertise, or affiliations for implementation of the plan.

- f. If there is disagreement among the consulting parties (SHPO, Tribes, appropriate consulting parties) regarding the eligibility of a material or resource for listing in the NRHP, the FTA may forward adequate documentation, in accordance with 36 CFR Part 63 to the Keeper of the NRHP for a formal determination of NRHP eligibility, as provided by 36 CFR § 800.4(c)(2).

The SHPO Archaeology Discovery Guide is provided in Attachment D and can be referenced as an aid in the event of unanticipated discoveries.

VII. EMERGENCY SITUATIONS

- A. Should an emergency occur during construction of the Project that represents an imminent threat to public health or safety or creates a hazardous condition and in either case has the potential to affect historic properties, the CCDoTH will contact the appropriate emergency response agency with jurisdiction as soon as possible. The CCDoTH will notify the Signatories and other Consulting Parties within one (1) business day of the condition which created the emergency and include: the immediate action taken in response to the emergency, the effects of the response to historic properties, and, where appropriate, further plans to address the emergency. This will include any further proposals to avoid, minimize, or mitigate potential adverse effects to historic properties.
- B. The Signatories and other Consulting Parties will each have seven (7) calendar days to concurrently review and comment on the plan(s) for further action. If the FTA, the SHPO, and other Consulting Parties, as appropriate, do not object to the plan within the review period, then the CCDoTH will implement the proposed plan(s).
- C. Where possible, the CCDoTH will ensure that emergency responses allow for future preservation or restoration of historic properties and take into account the SOI Standards for the Treatment of Historic Properties and include on-site monitoring by the appropriate SOI-Qualified Professional, in accordance with Stipulation II.
- D. Immediate rescue and salvage operations conducted to preserve life, property, and/or public health are exempt from these and all other provisions of this MOA.

VIII. DISPUTE RESOLUTION

- A. Should any Signatory to this MOA object in writing at any time to any actions proposed or the manner in which the terms of this MOA are implemented, the FTA will consult with the disputing Signatory to resolve the objection. If the FTA determines that such objection cannot be resolved, the FTA will:
1. Forward all documentation relevant to the dispute, including any timely advice or comments regarding the dispute from the Signatories and Concurring Parties, and the FTA's proposed resolution to the ACHP. ACHP will provide the FTA with its advice on the resolution of the objection within thirty (30) calendar days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the FTA will prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and provide it to the Signatories and Concurring Parties. The FTA will then proceed according to its final decision.
 2. If the ACHP does not provide its advice regarding the dispute within the thirty (30) calendar day period of receiving documentation, the FTA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the FTA will prepare a written response that takes into account any timely comments regarding the dispute from the Signatories and Concurring Parties to the MOA and provide them and the ACHP with a copy of such written response.
 3. The FTA and the CCDOTH's responsibility to carry out all other actions under the terms of this MOA that are not the subject of the dispute will remain unchanged.

IX. AMENDMENT

- A. This MOA may be amended when such amendment is agreed to, in writing, by all Signatories. The amendment will be effective on the date that a copy signed by all Signatories is filed by the FTA with the ACHP. 36 CFR § 800.6(c)(7) will govern the execution of any such amendment.

X. TERMINATION

- A. This MOA will expire in ten (10) years from the date of execution. If any Signatory to this MOA determines that the MOA terms cannot be carried out, that party will immediately consult with the other Signatories to attempt or develop an amendment per Stipulation IX. If within thirty (30) calendar days (or another time period agreed to by all Signatories in writing), an amendment cannot be reached, any Signatory may terminate the MOA upon written notification to the other Signatories. Concurring Parties will be notified of termination.
- B. Once the MOA is terminated, and prior to work continuing on the undertaking, the FTA must either:
1. Execute a new MOA with the Signatories pursuant to 36 CFR § 800.6(c)(1) or
 2. Request, take into account, and respond to ACHP comments provided under 36 CFR § 800.7(a). The FTA will notify the Signatories and Concurring Parties of the course of action it will pursue.

XI. EXECUTION

- A. This MOA may be executed in counterparts, and delivered by facsimile or PDF format, and in any such circumstances, shall be considered one document and an original for all purposes. This MOA will become effective on the date of the final signature by the Signatories and Invited Signatories (Execution Date). The FTA will ensure each Signatory is provided with a complete copy of the MOA, and that the final MOA, any updates to attachments, and any amendments are filed with the ACHP.
- B. Execution of this MOA by the FTA and the SHPO and implementation of its terms is evidence that the FTA has taken into account the effects of this undertaking on historic properties and has afforded the SHPO and ACHP opportunity to comment pursuant to Section 106 of the NHPA.

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COOK COUNTY, ILLINOIS
(SHPO LOG #015101024)**

SIGNATORY

Federal Transit Administration

SIGNED **KELLEY** Digitally signed by
KELLEY BROOKINS
Date: 2026.06.25
07:51:34 -05'00'
BY: **BROOKINS**

Date: **June 25, 2026**

**Kelley Brookins, Regional Administrator
FTA Region 5**

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(SHPO LOG #015101024)**

SIGNATORY

Illinois State Historic Preservation Office

SIGNED

Carey L. Mayer

Date: 5/19/2026

BY:

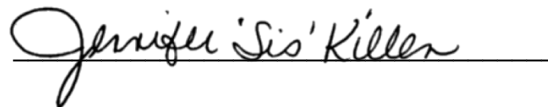
**Carey L. Mayer, AIA
Deputy State Historic Preservation Officer
Illinois Department of Natural Resources**

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(SHPO LOG #015101024)**

INVITED SIGNATORY

Cook County Department of Transportation and Highways

**SIGNED
BY:**



Date: 05/19/2026

**Jennifer “Sis” Killen, P.E.
PTOE
Superintendent**

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CONCURRING PARTY

Forest County Potawatomi Community, Wisconsin

SIGNED _____

Date: _____

BY:

**Luke Heider
Tribal Historic Preservation Officer**

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CONCURRING PARTY

Preservation Chicago

SIGNED _____ **Date:** _____
BY:
Debbie Dodge
Director of Development & Policy

**ATTACHMENT A:
LIST OF CONSULTING PARTIES**

Invited

City of Chicago
Department of Planning and Development, Landmarks Division
Preservation Chicago
Citizen Potawatomi Nation, Oklahoma
Forest County Potawatomi Community, Wisconsin
Hannahville Indian Community, Michigan
Kickapoo Tribe of Oklahoma
Little Traverse Bay Bands of Odawa Indians, Michigan
Menominee Indian Tribe of Wisconsin
Miami Tribe of Oklahoma
Prairie Band Potawatomi Nation

Accepted

Preservation Chicago
Forest County Potawatomi Community, Wisconsin

ATTACHMENT B – PROJECT APE AND SURVEY RESULTS

Basement Level, City Hall-Cook County Building, 118 N. Clark Street, Chicago, IL



SURVEY RESULTS

Resource Number	Property Name (if applicable); Address	NRHP Status	Effects Recommendation
N/A	Chicago Central Loop Pedway System	Previously Determined NRHP-Eligible under Criterion A ¹	Adverse Effect
NRIS 12001238	West Loop-LaSalle Historic District	NRHP-listed under Criteria A and C	No Adverse Effect
Forms part of NRIS 12001238	Chicago City Hall (City Hall-County Building); 118-121 N. Clark Street	Contributing resource to NRHP listed West Loop-LaSalle Historic District; City of Chicago Local Landmark	No Adverse Effect
N/A	Richard J. Daley Center (Chicago Civic Center); 50 W. Washington Street	NRHP-Eligible ² ; City of Chicago Local Landmark	No Adverse Effect

1. The underground pedway system in Central Loop that was previously determined eligible on October 10, 2024, is within the APE.
2. The Richard J. Daley Center at 50 W. Washington Street that was previously determined eligible on January 16, 2020, is within the APE.
3. The West Loop-LaSalle Street Historic District that was listed on the National Register of Historic Places on June 1, 2013, including 1 contributing resource of the City Hall County Building at 118 N. Clark St./121 N. LaSalle St. are within the APE.

¹ The Central Loop Pedway System was previously determined NRHP-Eligible by SHPO in 2024, as documented in the letter from SHPO dated February 11, 2024. The property is recommended NRHP Eligible under Criterion A as part of this Undertaking.

² Detailed eligibility information, such as the NRHP criteria under which the subject property is eligible under, was not detailed in the letter from SHPO dated February 11, 2024.

Attachment C: Map of the Main Stem of the Pedway System



Attachment D:

SHPO Archaeology Discovery Guide



Illinois Department of Natural Resources

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

JB Pritzker, Governor
Colleen Callahan, Director

SHPO Archaeology Discovery Guide

Although verification of the presence of cultural resources can be difficult, two clues are the presence of (1) artifacts on an excavated surface or in a spoil pile and (2) soil discolorations or anomalies.



Artifacts, such as those specimens illustrated in the following photographs, are the most common indicators for the presence of archaeological sites. Some of these will be familiar objects and easily recognized, while others may require special expertise to identify.

Stone tools are the most easily recognized pre-contact Native American artifacts present on archaeological sites in Illinois. These can include projectile points (arrowheads and spear tips), celts (axes), adzes, and hoes or spades.



The majority of pre-contact Native American artifact assemblages are comprised of lithic "debitage" or fragments (flakes, chips) of stone (usually chert or flint), which are the byproducts of tool manufacture.



Pre-contact Native American ceramic artifacts are often broken into sherd fragments that can often look like lumps of dried dirt and require careful examination. Some will show signs of deliberate marking and/or decoration.



Artifacts related to Euro-American settlement and habitation may be encountered. These may include ceramics, glass (curved vessel and/or flat window), nails, and bricks.



Architectural features may also be encountered, including structural foundations (with or without cellars) and walls. Other features may include wells and cisterns.



Human remains are the most sensitive of all cultural the resources that may be encountered. These, most importantly, must be treated with the utmost respect.

Please note the locations and details of all inadvertently discovered cultural resources are confidential.