



Ms. Diana Welling
Director
Resource Protection and Review
Ohio History Connection, State Historic Preservation Office
800 E. 17th Ave.,
Columbus, OH 43211

May 19, 2021

RE: Anthony J. Celebrezze Federal Building, 1240 E. Ninth St, Cleveland, Ohio
MOA Fulfillment Extension Request, Facade Over-Clad & Security Upgrade Project

Dear Diana,

This letter provides an update on the status of the General Service Administration's progress in fulfilling the stipulations set forth in the June 2013 *Memorandum of Agreement between the U.S. General Services Administration, the Ohio State Historic Preservation Office, and the Advisory Council on Historic Preservation Regarding the Façade Over-Clad and Security Upgrade Project at the Anthony J. Celebrezze Federal Building, Cleveland, Ohio*. GSA has previously satisfied several of the MOA's stipulations. Other stipulations required data to be gathered over an extended period and have only recently been addressed. One stipulation--the requirement to provide a Record of Performance documenting the rate of deterioration of the original facade materials--is currently unfulfilled. This is due to unforeseen extensive delays to the project completion date as well as restrictions to building access resulting from the Covid-19 pandemic.

Because the MOA is scheduled to expire on June 26, 2021, GSA requires a two-year extension to the term of the MOA that would allow the stipulation to be addressed as soon as site access restrictions are lifted. In support of that request, GSA is providing this update letter and appendices, which demonstrate the agency's good-faith efforts to satisfy the requirements of the MOA.

As you are aware, GSA has previously demonstrated fulfillment of all avoidance and minimization stipulations and the following mitigation stipulations:

- II.C.1.a.: Historic Building Film Series: The documentary film ***Modernism Renewed*** was completed in 2015 and is available for public access on [GSA's Historic Building Film Series Website](#) as well as YouTube. This film was publicly presented at an AIA/GSA/CIA Film Premier on February 2, 2016 and also shown several times to the public at the Celebrezze building. It received national attention when presented as a Special Topic Lunch Session with Q&A at the National PRP3 conference in Los Angeles, CA on March 14, 2019 at 1:15pm. Web link of conference program here: <https://www.prp3.org/program> The promotional trailer can be found here [Modernism Renewed Trailer](#).

- II.C.1.b: Educational Session held as part of the AIA Ohio Annual Convention (September 12, 2012).
- II.C.1.d.: Construction Signage information as described in this section was on display during the course of construction.

Prior to this writing, GSA had not yet demonstrated fulfillment of the following mitigation stipulations:

- II. C.1.c.: Mobile Application Partnership
- II.C.2.a.: GSA Assessment Tool
- II.C.3.a.: Record of Performance
- II.C.3.b.: ARRA Project Life-Cycle and Data Collection
- II.C.3.c.: Project Record

The remainder of this letter contains additional details regarding the status of each of the five outstanding stipulations. As you will see, GSA has substantially completed the work required for the Mobile Application Partnership, the GSA Assessment Tool, the ARRA Project Life-Cycle and Data Collection, and Project Record stipulations. The Record of Performance stipulation has not yet been completed, and is the basis for the request to extend the term of the MOA.

Mitigation Stipulation II.C.1.c.: Mobile Application Partnership

This stipulation requires GSA to “contribute content on the Property and the Undertaking to “Cleveland Historical” (<http://clevelandhistorical.org>), a mobile application developed and managed by Cleveland State University that allows the general public to explore the people, places and moments that have shaped Cleveland’s history.” GSA is pleased to report that it has established a dialogue with Professor J. Mark Souther, Ph.D., Director of the Center for Public History + Digital Humanities at Cleveland State University and administrator of the “Cleveland Historical” application, who has confirmed a willingness to accept and publish an entry on the Celebrezze Building. Concurrently, GSA drafted the text for the article, assembled historical images, and prepared these materials for transmission to “Cleveland Historical.” The draft text and list of images, formatted according to Prof. Souther’s specifications for submission, are attached to this letter as Appendix A. Per the MOA, GSA requests that Ohio SHPO review and comment on the draft text. Once received, these comments will be incorporated into the article, which can then be transmitted to “Cleveland Historical” for publication.

Mitigation Stipulation II.C.2.a.: GSA Assessment Tool

This stipulation requires GSA to update the GSA Assessment Tool, which was originally developed as part of its publication Growth, Efficiency and Modernism: GSA Buildings of the 1950s, 60s and 70s (GEM). In the fifteen years since GSA published GEM, the agency has used this national context study and its accompanying eligibility assessment (GEM Tool) to document and evaluate the potential significance of its Modern-Era resources. In doing so, GSA has honed its

understanding of mid-century modern federal architecture and the policies and programs that guided this period of American design and construction.

Originally intended to assist GSA associates nationwide in assessing the potential eligibility of agency-owned Modern-Era resources for the National Register of Historic Places, the GEM Tool was soon popularized by the widespread distribution of *GEM*. The GEM Tool became a guide used by many including State Historic Preservation Officers, GSA contractors, academics and others across multiple disciplines who sought to enhance their understanding of this largely unevaluated era. GSA, through the GEM Tool, provided a roadmap for applying familiar criteria to unfamiliar building massing, materials, technologies, and social and environmental programs that defined decades of American architecture and ingenuity. The GEM Tool established GSA's leadership in the identification and documentation of Modern-Era resources and served to better inform agency reinvestment decisions for a collection of buildings that constitute more than one-third of GSA's owned inventory.

Over the intervening years, GSA has gained valuable knowledge and learned lessons that can better refine evaluations of not only Modern-Era resources, but later eras as buildings begin to near 50 years of age. The updated GEM Tool, now renamed more broadly as a Determination of Eligibility Tool (DOE Tool) raises the bar on property documentation and clarifies GSA's expectations when it comes to the content expected in determination of eligibility reports. The new tool requires:

- greater consideration of local, state and national significance and the need to explore these varying contexts;
- the identification of direct links to justify claims of association, particularly as it relates to federal programs;
- substantiation of 'master architect' designation based on a proven--not simply prolific--record of achievement
- furtherance of style discussion—including what elements and features define the assigned style and how the design compares to and/or reflects other projects realized within the appropriate local, statewide or national context—in both the public and private sectors of the time.

Per the requirements of the MOA, GSA is sharing this new DOE Tool with your office and various other SHPOs to provide an opportunity to review and comment upon it as we work to implement its findings and recommendations into our agency's day-to-day resource evaluation operations. The DOE Tool is attached as Appendix B.

Mitigation Stipulation II.C.3.b.: ARRA Project Life-Cycle and Data Collection

This stipulation requires GSA to “make available, upon its completion, the project information collected by GSA's Information Management Division on this ARRA Undertaking” related to “energy

and sustainability goals and building performance targets...” Pursuant to this stipulation, please find attached to this letter as Appendix C a report prepared by GSA’s regional staff for the Energy, Environment and Sustainability Branch illustrating energy and water usage at the Celebrezze Building from 2003(energy)/2007(water) to 2021. This report clearly shows a downward trend in energy and water usage at the Celebrezze building since the completion of the facade over-clad project, and a simultaneously executed Energy Savings Performance Contract (ESPC) project in 2017. Although the project itself resulted in some fluctuations in energy and water consumption during the preceding period. Please also note that the building switched from steam to water heat in 2014, which is reflected in the appended document as an increase in water consumption at that time. This further contributes to energy savings beyond the accomplishments of the ARRA project.

Mitigation Stipulation II.C.3.a.: Record of Performance

This stipulation requires GSA to “make available a record of the performance (rate of deterioration) of the original facade materials over the course of the last two decades and once stabilized and enclosed with the new double-wall/over-clad system.” Several studies documented the condition of the facade prior to the over-clad construction. Some of these were provided to SHPO during consultation, but they will also be included as part of the project documentation. As noted previously, GSA has not been able to complete the inspections necessary for the fulfillment of the second portion of this stipulation. This was due to delays in the Over-Clad Project schedule. Substantial completion of the project was pushed back until August 2017 with additional work being executed even after that date. Additionally, building access restrictions resulting from the Covid-19 pandemic have kept us from making assessments we had planned to undertake in 2020. However, GSA has made affirmative steps toward conducting the inspections and preparing the necessary documentation once restrictions are lifted. A GSA materials conservator and a preservation architect will assess the remaining historic facade under the over-clad system once Covid concerns subside. A report summarizing findings and current photographs will be provided.

Mitigation Stipulation II.C.3.c.: Project Record

This stipulation requires GSA to “collect, retain and make available, upon request, the documents identified in the *List of GSA Studies and Reports Informing the Development of the Celebrezze Facade Repair and Over-Clad Project*, attached [to the MOA] as Appendix G.” GSA would like to pursue installing the project record documents at the Ohio History Connection Library and Archives. We will connect with that office to confirm acceptance of these documents.

Because of multiple unavoidable delays in the fulfillment of the Record of Performance stipulation, GSA requires a two-year extension to the term of the MOA. To simplify the execution of our requested time frame amendment and recognizing the MOA expires on June 26, 2021, we have inserted a concurrence page for GSA, the Ohio SHPO and the ACHP at the end of this letter. Affixed and dated signatures by all organizations will ratify this proposed amendment extending the

revised expiration date to June 26, 2023. The ACHP would be the final signatory and retain the official copy as part of their record documents for the MOA.

As the preceding information demonstrates, GSA has made significant progress toward complete fulfillment of the MOA. The completion of the Mobile Application text, DOE Tool, Building Life-Cycle report, and identification of a repository for the Over-Clad Project Record, combined with our past work on the historical film, education session, and other stipulations, represent a significant contribution to the available body of knowledge related to this building, Modernism, historic preservation, construction technology, and multiple other areas of interest. We look forward to completing our contributions with the fulfillment of the Record of Performance stipulation.

If you have concerns with this request for an extension of our fulfillment time, we would welcome the opportunity to discuss it at your convenience.

Sincerely,



Regina Nally
Historic Preservation Officer

cc: Beth Savage, GSA Federal Preservation Officer, Washington, DC
John Cooke, GSA Regional Commissioner, Great Lakes Region, Chicago, IL
Diana Welling, Ohio State Historic Preservation Office, Columbus, OH
Reid Nelson, Advisory Council on Historic Preservation, Washington, DC

Enclosures Appendix A: "*Cleveland Historical*" *Story Worksheet*, by U.S. General Services Administration, 2021, 7 pages.
Appendix B: *Determination of Eligibility Assessment Tool* (DOE Tool), by U.S. General Services Administration, 2020, 15 pages.
Appendix C: *Celebrezze Building Energy and Water Usage Charts*, by U.S. General Services Administration, 2021, 2 pages.

SIGNATURE PAGE

The following parties concur with GSA’s proposed two year extension for the Anthony J. Celebrezze Federal Building MOA Fulfillment Request, for Facade Over-Clad & Security Upgrade Project. The parties also accept the submitted completed stipulation items included with this document. The new fulfillment date for the outstanding items would be June 26, 2023.

IN WITNESS WHEREOF, the Signatories hereto have caused this Agreement to be executed by their proper and duly authorized officers on the dates hereinafter identified.

SIGNATORIES:

United States General Services Administration

By: _____ Date: _____

John Cooke
Regional Commissioner Great Lakes Region
Public Buildings Service

By: _____ Date: _____

Beth L. Savage
Federal Preservation Officer
Public Buildings Service

Ohio State Historic Preservation Office

By: _____

Date: June 23, 2021

Diana Welling

Deputy State Historic Preservation Officer

Advisory Council on Historic Preservation

By:  _____

Date: June 25, 2021

Reid Nelson

Acting Executive Director