



Version 1

Public Hearing Summary

Environmental Impact Statement for the Buildings at 202, 214, and 220 South State Street Chicago, Illinois

February 12, 2024



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Executive Summary

The U.S. General Services Administration (GSA) is assessing the future of three vacant federally owned buildings located at 202, 214, and 220 South State Street in Chicago, Illinois, to address the security needs of the Dirksen Courthouse, respond to congressional intent in the Consolidated Appropriations Act of 2022, and manage federal assets. In accordance with the National Environmental Policy Act (NEPA), GSA has prepared a Draft Environmental Impact Statement (EIS) that examines the potential environmental impacts of the Proposed Action. Under NEPA, federal agencies must provide the public with an opportunity to review and comment on the Draft EIS.

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 EIS findings and provided opportunities to submit comments on the Draft EIS during the open 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 via the comment form (electronic or hard copy), email, and postal mail.

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. A total of 530 public and agency comments were received during the comment period. GSA will provide responses in the Final EIS to all substantive comments received during the public comment period. Public hearing comments are included in Appendix I of this Public Hearing Summary.

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Acronyms and Abbreviations

Acronym	Definition
EIS	Environmental Impact Statement
GSA	General Services Administration
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of Availability

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1. Introduction

1.1 Project Background

The U.S. General Services Administration (GSA) is assessing the future of three vacant federally owned buildings located at 202, 214, and 220 South State Street in Chicago, Illinois. The purpose of the Proposed Action is to address the security needs of the Dirksen Courthouse, respond to congressional intent in the Consolidated Appropriations Act of 2022, and manage federal assets. In accordance with the National Environmental Policy Act (NEPA), GSA prepared a Draft Environmental Impact Statement (EIS) examining the potential environmental impacts of two action alternatives (Alternative A: Demolition or Alternative B: Viable Adaptive Reuse of the buildings) and a No Action Alternative.

The three properties, for which Congress has appropriated funds for demolition, reside in the Loop Retail Historic District listed in the National Register of Historic Places. 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 to not be 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 storefront from the 1940s, which falls within the period of significance for the Loop Retail Historic District. Additionally, it appears to retain its upper-story fenestration from that era. Therefore, GSA considers 214 South State Street to contribute to the historic district for purposes of this undertaking.

Section 106 of the National Historic Preservation Act (NHPA) requires GSA to consider the effects of the Action Alternatives on historic properties and to provide opportunities for public input. GSA initiated the Section 106 consultation process for the Proposed Action in October 2022. 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 identified consulting parties after the scoping meeting 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). The Section 106 process is ongoing and concurrent with NEPA.

1.2 Purpose of Public Hearing and Comment Period

Under NEPA, federal agencies must provide the public with an opportunity to review and comment on the proposed federal action and potential environmental impacts as described in the Draft EIS. The Draft EIS comment period keeps the federal decision-making process transparent and accountable by providing the public and relevant agencies an opportunity to comment on the Draft EIS to GSA. This input will be incorporated into the Final EIS.

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 EIS findings and provided opportunities to submit comments on the Draft EIS during the open 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 via the comment form (electronic or hard copy), email, and postal mail.

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2. Summary of Public Hearing Notices

2.1 Notice of Availability

A notice of the public hearing and Notice of Availability (NOA) 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 for the buildings at 202, 214, and 220 South State Street. A copy of the NOA is included in Appendix A and available online at the Region 5 GSA State Street website found [here](#).¹

2.2 Hearing Advertisements

The following subsections present various advertising campaigns for the public hearing and Draft EIS comment period.

2.2.1 Notices in Local Media

Paid advertisements for the public hearing and Draft EIS comment period were published in the legal notices of the *Chicago Tribune* newspaper and public notices of the *Chicago Sun-Times* newspaper on Sunday September 17, 2023, and Friday September 29, 2023. The advertisements announced the availability of the Draft EIS and included information on how to attend the public hearing and submit comments. On Tuesday September 12, 2023, *Newcity*, an online magazine that publishes Chicago arts and culture stories, posted an article containing links to the Draft EIS and information on how to register for the hearing. Appendix B presents additional information regarding the paid advertisements and notice.

2.2.2 Public Hearing Invitation Postcards

Invitation postcards providing information on the Draft EIS and public hearing were mailed 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 (Appendix C provides additional information for the public hearing invitation postcard).

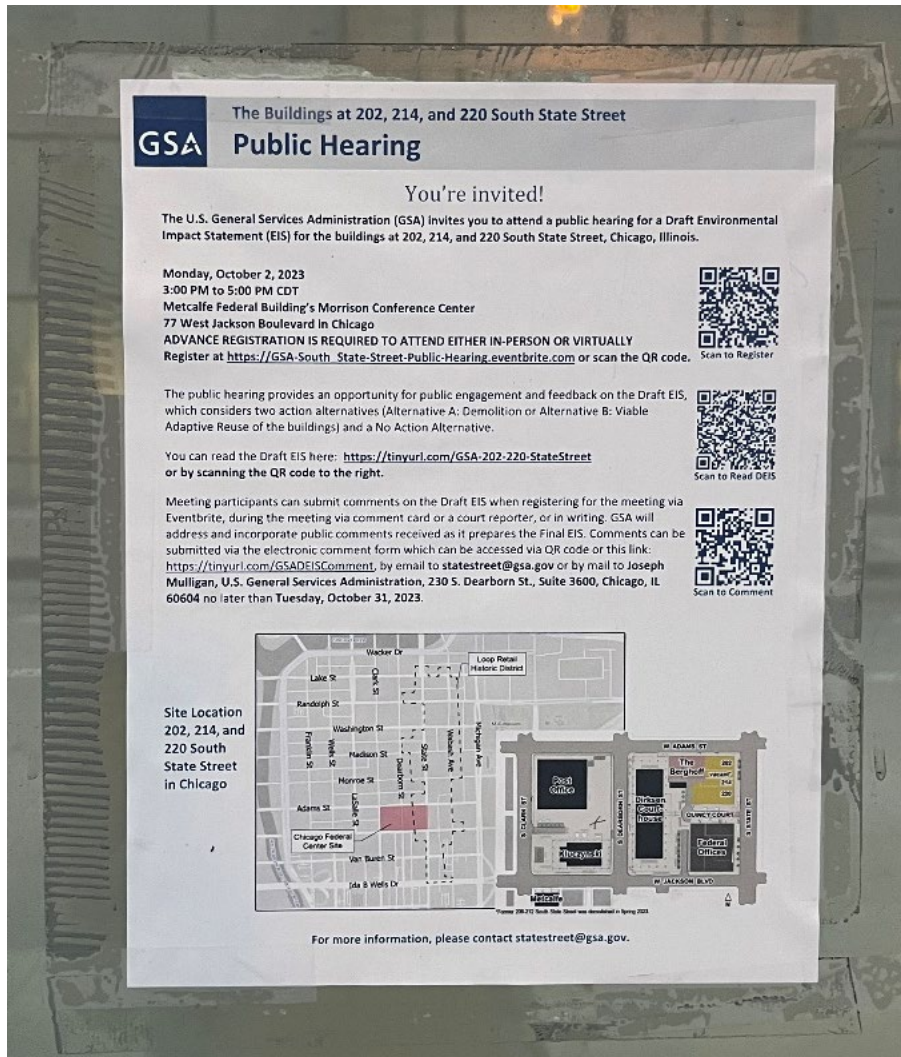
The postcards included information on the Draft EIS and how to view it, how to register for the hearing using Eventbrite, and how to submit comments on the Draft EIS. The postcard had links and QR codes to access the Draft EIS and register for the hearing.

2.2.3 Public Hearing Flyers

On Thursday September 14, 2023, flyers with information on the public hearing were posted on and in buildings in downtown Chicago within a quarter-mile radius of the buildings at 202, 214, and 220 South State Street (Photograph 1). The flyers invited the public to read the Draft EIS, submit comments, and attend the public hearing. Appendix D contains a copy of the public hearing flyer.

¹ General Services Administration (GSA). 2023. *Draft Environmental Impact Statement for the Buildings at 202, 214, and 220 South State Street, Chicago, Illinois*. September 15. <https://www.federalregister.gov/documents/2023/09/15/2023-19518/draft-environmental-impact-statement-for-the-buildings-at-202-214-and-220-south-state-street-chicago>.

Figure 1. Flyer posted in building near the GSA-owned State Street buildings



2.2.4 Press Release Article on the GSA Great Lakes Region 5 Website

A press release article announcing the public hearing was posted on the GSA Great Lakes Region 5 Newsroom website on September 20, 2023. The posting provided details on how to view the Draft EIS, how to submit comments, and when and how to attend the hearing. A copy of the posting is included as Appendix E; it can also be found online.²

2.2.5 Social Media

The public hearing was also advertised as an event on the social media outlets Facebook and Patch (refer to Appendix F).

² General Services Administration (GSA). 2023. GSA to host public hearing for 202, 214, and 220 South State Street. September. <https://www.gsa.gov/about-us/regions/region-5-great-lakes/region-5-newsroom/great-lakes-feature-stories-and-news-releases/gsa-to-host-public-hearing-for-202220-s-state-street-09202023>.

3. Public Hearing

3.1 Overview

A hybrid in-person and virtual public hearing was held from 3 p.m. to 5 p.m. Central Standard Time on October 2, 2023, at the Metcalfe Federal Building's Morrison Conference Center (77 West Jackson Boulevard) with an option to attend virtually via Zoom. A total of 53 people attended the public hearing (28 in-person and 25 via Zoom). This number excludes GSA and their consultants who attended in-person or via Zoom. As detailed in Section 2, Summary of Public Hearing Notices, the hearing was advertised by mailed invitation, in local newspapers, on social media, and on the GSA Great Lakes Region 5 website.

3.2 Materials Provided

Upon arrival, attendees were welcomed and encouraged to sign in. Informative display boards were available, offering:

- Hearing Overview: Purpose, agenda, and participation instructions (including commenting guidelines).
- Project Details: Site location, potential impacts on historical and cultural resources, planned mitigation measures, and a summarized overview of potential environmental impacts (see Photograph 2 for reference).

For those wishing to provide feedback on the Draft EIS, written comment forms were readily available (Photograph 3). Comments could be submitted to GSA during the designated comment period (September 15 - October 31, 2023) in several ways:

- Directly at the meeting through a designated submission box or via the court reporter
- By email
- By postal mail
- Using the electronic comment form

Both the display boards and comment forms are included in Appendices G and H, respectively. Additionally, two printed copies of the Draft EIS were available for attendees to review at the hearing itself (Photograph 4).

Figure 2. Display boards with project information

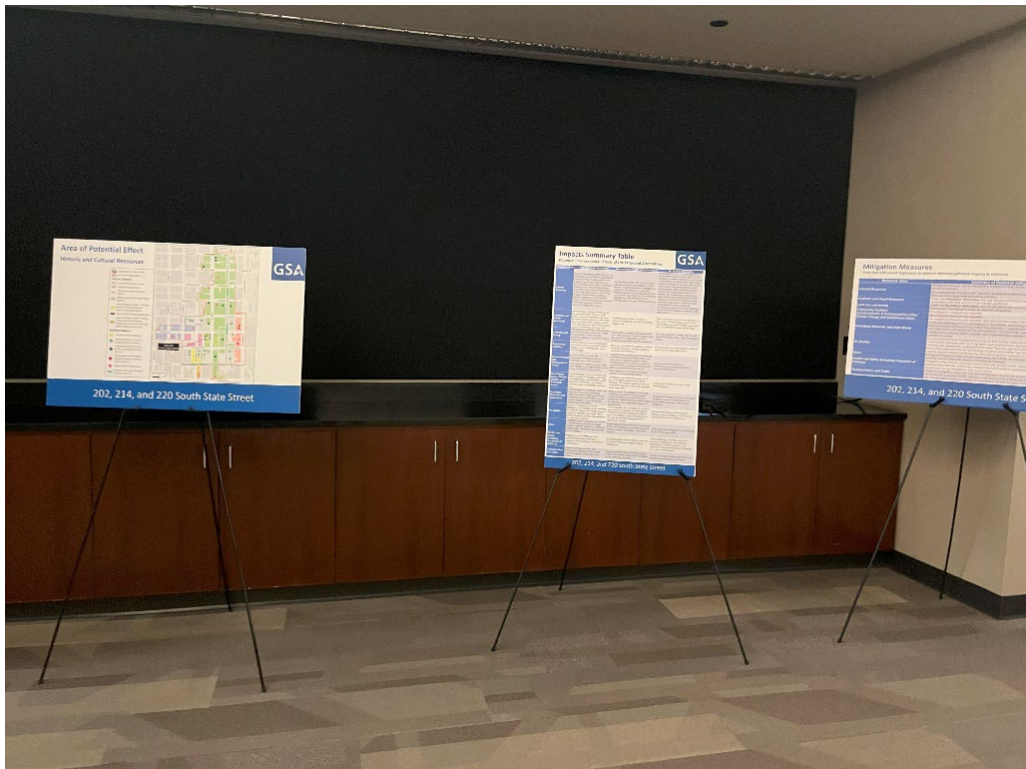


Figure 3. Welcome area with a check-in table to sign in and comment table



Figure 4. Printed copies of the Draft EIS available for hearing attendees to review



3.3 Presentation and Public Comment Period

The hearing included a presentation by GSA representatives and remarks from GSA Great Lakes Regional Commissioner Angel Dizon and Chief Judge Rebecca Pallmeyer of the U.S. District Court for the Northern District of Illinois. A public comment period was held during which virtual and in-person attendees were individually called forward by a moderator to make verbal comments to a panel of three GSA Region 5 staff. Public comments were limited to 3 minutes so that everyone who wished to speak had enough time to do so. After initial comments were received from everyone who wished to provide them, a second opportunity to provide comments was offered.

A stenographer recorded the presentation and public comments, and the virtual meeting was recorded via Zoom. An additional stenographer was in a separate room for the duration of the meeting for attendees to make verbal comments at any time. A transcript of the hearing is available on the GSA project website.³

³ General Services Administration (GSA). 2023. 202-220 S. State St. Federal Properties. <https://www.gsa.gov/about-us/gsa-regions/region-5-great-lakes/buildings-and-facilities/illinois/chicago-202220-s-state-st-fps>

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4. Comments on the Draft EIS

4.1 Methods of Submitting

Comments on the Draft EIS could be submitted in the following ways:

- In writing via Eventbrite during public hearing registration
- In writing via electronic comment form
- Verbally (in-person and virtually) during the public hearing
- Verbally (in-person) to a stenographer at any time during the hearing
- In writing on a comment form submitted via a submission box at the hearing
- In writing via email or postal mail to GSA during the Draft EIS comment period

All comments are given the same consideration, regardless of submission method.

4.2 Comments Received and GSA Responses

Council on Environmental Quality regulations require a minimum 45-day comment period for a Draft EIS. The Draft EIS comment period began on September 15, 2023, when the NOA of the Draft EIS was published in the *Federal Register* and closed on October 31, 2023.

A total of 530 comments were received during the Draft EIS public 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. Appendix I includes all comments received.

4.3 Summary of Comments and Major Concerns

This section identifies the major concerns that were communicated to GSA during the Draft EIS comment period.

- Commenters said that the Draft EIS needed more information on why other options to improve security to the Dirksen Courthouse (such as retrofitting the Dirksen Courthouse, security risk of other nearby buildings, and moving the Dirksen Courthouse) were not evaluated as alternatives.
- The assessment of environmental impacts of embodied carbon, air quality, and materials resulting from Alternative A: Demolition, was another concern shared by commenters.
- Commenters found the Adaptive Reuse Criteria too restrictive and therefore believed they were an infeasible preservation option in the Draft EIS.
- The Draft EIS did not adequately consider the City of Chicago's proposed preliminary landmark recommendation for the Century and Consumers Buildings in its analysis. Commenters advocated against demolition and for adaptive reuse that meets security needs.

4.4 Addressing Comments

GSA addressed comments received during the Draft EIS comment period in compliance with all applicable federal requirements and guidelines. Where appropriate, comments received during the Draft EIS comment period may be incorporated into the Final EIS by revising the text or methodologies of the EIS, adding new information to the EIS, developing new mitigation measures, or they will be acknowledged in an appendix of the Final EIS.

4.5 Next Steps

Draft EIS to Final EIS:

- The Draft EIS will be updated to address public comments and incorporate any necessary changes.
- The updated Draft EIS will be published as the Final EIS and become available for public review.

Public Review and Record of Decision:

- Following publication of the Final EIS, a 30-day waiting period is mandatory between the Federal Register Notice of Availability (NOA) date and the signature date of the Record of Decision (ROD).

Record of Decision (ROD):

- The ROD outlines:
 - Reasons for the project decision
 - Selected alternative
 - Required mitigation measures

Appendix A

Notice of Availability

the Board of Governors, Ann E. Misback, Secretary of the Board, 20th Street and Constitution Avenue NW, Washington, DC 20551-0001, not later than October 16, 2023.

A. *Federal Reserve Bank of Chicago* (Colette A. Fried, Assistant Vice President) 230 South LaSalle Street, Chicago, Illinois 60690-1414.

Comments can also be sent electronically to

Comments.applications@chi.frb.org:

1. *Savanna-Thomson Investment, Inc., Savanna, Illinois*; to merge with Maximum Bancshares, Inc., and thereby indirectly acquire Fidelity Bank, both of West Des Moines, Iowa.

Board of Governors of the Federal Reserve System.

Michele Taylor Fennell,

Deputy Associate Secretary of the Board.

[FR Doc. 2023-20022 Filed 9-14-23; 8:45 am]

BILLING CODE P

FEDERAL TRADE COMMISSION

Agency Information Collection Activities; Proposed Collection; Comment Request; Extension

AGENCY: Federal Trade Commission.

ACTION: Notice.

SUMMARY: In accordance with the Paperwork Reduction Act of 1995 (PRA), the Federal Trade Commission (FTC or Commission) is seeking public comment on its proposal to extend for an additional three years the Office of Management and Budget clearance for its Fuel Rating Rule (the Rule). The current clearance expires on September 30, 2023.

DATES: Comments must be filed by October 16, 2023.

ADDRESSES: Interested parties may file a comment online or on paper, by following the instructions in the Request for Comment part of the **SUPPLEMENTARY INFORMATION** section below. Written comments and recommendations for the proposed information collection should be sent within 30 days of publication of this notice to www.reginfo.gov/public/do/PRAMain. Find this particular information collection by selecting “Currently under 30-day Review—Open for Public Comments” or by using the search function. The [reginfo.gov](http://www.reginfo.gov) web link is a United States Government website produced by the Office of Management and Budget (OMB) and the General Services Administration (GSA). Under PRA requirements, OMB’s Office of Information and Regulatory Affairs

(OIRA) reviews Federal information collections.

FOR FURTHER INFORMATION CONTACT:

Hampton Newsome, Attorney, Division of Enforcement, Federal Trade Commission, Room CC-9528, 600 Pennsylvania Avenue NW, Washington, DC 20580, (202) 326-2889.

SUPPLEMENTARY INFORMATION:

Title: Fuel Rating Rule (the Rule), 16 CFR part 306.

OMB Control Number: 3084-0068.

Type of Review: Extension of a currently approved collection.

Likely Respondents:

(a) *Recordkeeping:* Refiners, Producers, Importers, Distributors, and Retailers of the Covered Fuel Types.

(b) *Disclosure:* Retailers of the Covered Fuel Types.

Estimated Annual Burden Hours: 31,976 (derived from 13,043 recordkeeping hours added to 18,933 disclosure hours).

Estimated Annual Labor Costs: \$481,374.¹

Estimated Annual Capital or Other Non-labor Costs: \$104,888.²

Abstract: The Fuel Rating Rule establishes standard procedures for determining, certifying, and disclosing the octane rating of automotive gasoline and the automotive fuel rating of alternative liquid automotive fuels, as required by the Petroleum Marketing Practices Act. 15 U.S.C. 2822(a)–(c). The Rule also requires refiners, producers, importers, distributors, and retailers to retain records showing how the ratings were determined, including delivery tickets or letters of certification.

Request for Comment

On May 2, 2023, the FTC sought public comment on the information collection requirements associated with the Rule. 88 FR 27514. No germane comments were received. Pursuant to the OMB regulations, 5 CFR part 1320, that implement the PRA, 44 U.S.C. 3501 *et seq.*, the FTC is providing this second opportunity for public comment while seeking OMB approval to renew the pre-existing clearance for the Rule.

Your comment—including your name and your state—will be placed on the public record of this proceeding. Because your comment will be made

¹ The hourly wage rates are updated from the 60-Day **Federal Register** notice and are based on mean hourly wages found at <http://www.bls.gov/iag/tgs/iag211.htm#earnings> for petroleum pump system operators, refinery operators, and gaugers and <http://www.bls.gov/iag/tgs/iag447.htm> for service station attendants. See Bureau of Labor Statistics, 2022 Occupational Employment Statistics for more details.

² This estimate is updated from the 60-Day **Federal Register** notice.

public, you are solely responsible for making sure that your comment does not include any sensitive personal information, such as anyone’s Social Security number; date of birth; driver’s license number or other state identification number, or foreign country equivalent; passport number; financial account number; or credit or debit card number. You are also solely responsible for making sure that your comment does not include any sensitive health information, such as medical records or other individually identifiable health information. In addition, your comment should not include any “trade secret or any commercial or financial information which . . . is privileged or confidential”—as provided by section 6(f) of the FTC Act, 15 U.S.C. 46(f), and FTC Rule 4.10(a)(2), 16 CFR 4.10(a)(2)—including in particular competitively sensitive information such as costs, sales statistics, inventories, formulas, patterns, devices, manufacturing processes, or customer names.

Josephine Liu,

Assistant General Counsel for Legal Counsel.

[FR Doc. 2023-19982 Filed 9-14-23; 8:45 am]

BILLING CODE 6750-01-P

GENERAL SERVICES ADMINISTRATION

[Notice-PBS-2023-05; Docket No. 2023-0002; Sequence No. 26]

Draft Environmental Impact Statement for the Buildings at 202, 214, and 220 South State Street, Chicago, Illinois

AGENCY: Public Building Service (PBS), General Services Administration (GSA).

ACTION: Notice of availability (NOA).

SUMMARY: GSA, in cooperation with the Federal Protective Service (FPS) and in accordance with the National Environmental Policy Act (NEPA), announces the availability, and opportunity for public review and comment, of the Draft Environmental Impact Statement (DEIS) for the buildings at 202, 214, and 220 South State Street, Chicago, Illinois. GSA is considering two action alternatives (Alternative A, Demolition or Alternative B, Viable Adaptive Reuse of the buildings) and a No Action Alternative.

DATES: GSA will hold a public hearing for the Draft EIS on Monday, October 2, 2023, from 3:00 p.m. to 5:00 p.m. Central Daylight Time (CDT) at the Morrison Conference Center, Metcalfe Federal Building located at 77 West

Jackson Boulevard, Chicago, IL. The public may attend the hearing in person or participate virtually in the hearing by registering at https://GSA-South_State-Street-Public-Hearing.eventbrite.com.

Council on Environmental Quality (CEQ) Regulations require a minimum 45-day review period. The review period starts on September 15, 2023, when the NOA of the draft EIS is published in the **Federal Register**. Comments are due to the GSA contact named below no later than Tuesday, October 31, 2023. GSA will address and incorporate public comments received as it prepares the Final EIS.

ADDRESSES: Comments may be presented orally or in writing during the meeting, by email, and by mail. All comments received will become public and part of the Administrative Record. Questions or comments concerning the Draft EIS should be directed to:

- *Email:* statstreet@gsa.gov.
- *Mail:* Joseph Mulligan, U.S. General Services Administration, 230 S. Dearborn St., Suite 3600, Chicago, IL 60604

Further information, including an electronic copy of the Draft EIS, may be found online on the following website: <https://www.gsa.gov/about-us/regions/region-5-great-lakes/buildings-and-facilities/illinois/chicago-202220-s-state-st-fps>.

FOR FURTHER INFORMATION CONTACT: Joseph Mulligan, GSA, 230 S. Dearborn St., Suite 3600, Chicago, IL 60604; cell: 312-886-8593; email: statstreet@gsa.gov.

SUPPLEMENTARY INFORMATION:

Proposed Action

The Proposed Action is to address the future of the three vacant buildings at 202, 214 and 220 South State Street, east of the Dirksen Courthouse. The purpose of the Proposed Action is to address the security needs of the Dirksen Courthouse, respond to Congressional intent considering the authorization of funds made to GSA by Congress in the 2022 Consolidated Appropriations Act, and manage Federal assets.

Alternatives Under Consideration

Demolition (Alternative A): This alternative would demolish the buildings at 202, 214 and 220 South State Street, Chicago, Illinois. In the 2022 Consolidated Appropriations Act, Congress appropriated funding to GSA for the purpose of demolition of the buildings, protecting adjacent buildings, securing the site, and landscaping the vacant site following demolition.

Viable Adaptive Reuse (Alternative B): This alternative would involve

contracting with one or more private developers to lease and use the three buildings at 202, 214, and 220 South State Street in accordance with the 15 viable adaptive reuse criteria, listed below, that were developed by GSA in collaboration with the U.S. District Court for Northern Illinois and Federal law enforcement agencies. These criteria were established to achieve GSA's and Federal law enforcement agencies' security objectives for the Dirksen Courthouse and would apply to any future uses of the buildings. No Federal funds would be available for rehabilitation, preservation, or restoration of buildings at 202, 214, and 220 South State Street, Chicago, Illinois; therefore, any rehabilitation or modification of the buildings to meet the criteria would not be performed at the Federal Government's expense. However, developers will have the opportunity to make improvements to the buildings in lieu of rent in accordance with section 111 of the National Historic Preservation Act. GSA will consider viable adaptive reuse alternatives if they meet or exceed the following viable adaptive reuse criteria. These restrictions would be applicable to all tenants and subtenants in perpetuity:

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 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.

No Action Alternative

GSA would continue to monitor the buildings' condition and secure the buildings; the buildings would remain in place and vacant, in need of significant repairs. GSA would also continue its efforts to develop a long-term plan for the buildings, as it has since it acquired them. GSA would have limited Federal funds available to continue with the maintenance and the buildings would be at risk of further deterioration.

After the Notice of Intent to prepare this Draft EIS was issued, GSA undertook an emergency action to demolish 208-212 South State Street because the structure posed an immediate threat to human health and safety. The demolition of 208-212 South State Street, a non-historic property, was a separate action and GSA completed an emergency Environmental Assessment (EA) to comply with NEPA. 208-212 South State Street was thus removed from the analysis of this Proposed Action.

Summary of Potential Impacts

The Draft EIS identifies, describes, and analyzes the potential effects of the Action and No Action alternatives,

including direct, indirect, and cumulative effects. GSA identified the following resources for analysis of both beneficial and adverse potential impacts: cultural resources; aesthetic and visual resources; land use and zoning; community facilities; socioeconomic and environmental justice; greenhouse gas, climate change, and embodied carbon; hazardous materials and solid waste; air quality; noise; health and safety; and transportation and traffic. The Draft EIS considers measures that would avoid, minimize, or mitigate identified adverse impacts. GSA welcomes public input on these potential impacts.

National Historic Preservation Act

In addition to NEPA, consultation under section 106 of the NHPA is occurring concurrently with the NEPA process. Two of the three buildings being considered for demolition are the Century Building (202 South State Street) and the Consumers Building (220 South State Street), which are historic resources that contribute to the Loop Retail Historic District listed in the National Register of Historic Places (NRHP). In this proposed action, 214 South State Street is being treated as eligible for listing in the NRHP as a contributing resource to the Loop Retail Historic District.

Schedule for Decision-Making Process

The following is a list of estimated time frames to complete the NEPA process:

- Draft EIS Public Comment Period: September 15 to October 31, 2023
- Final EIS: February 2024
- Record of Decision: April 2024

William Renner,

Director, Facilities Management and Services Programs Division Great Lakes Region 5, U.S. General Services Administration.

[FR Doc. 2023-19518 Filed 9-14-23; 8:45 am]

BILLING CODE 6820-CF-P

GENERAL SERVICES ADMINISTRATION

[Notice-ID-2023-11; Docket No. 2023-0002; Sequence No. 32]

Privacy Act of 1974; Rescindment of a System of Records

AGENCY: Office of the Chief Privacy Officer, General Services Administration, (GSA).

ACTION: Rescindment of a system of records notice.

SUMMARY: Pursuant to the Privacy Act of 1974 and Office of Management and

Budget (OMB) Circular No. A-108, notice is hereby given that the General Services Administration (GSA) proposes to rescind the GSA/OAP-4 FedBizOps System of Records Notice (SORN). The rescinded system of records described in this notice no longer maintains any Personally Identifiable Information (PII).

DATES: Effective immediately.

ADDRESSES: Submit comments identified by "Notice-ID-2023-11, Rescindment of a System of Records" via <http://www.regulations.gov>. Search for "Notice-ID-2023-11, Rescindment of a System of Records." Select the link "Comment Now" that corresponds with "Notice-ID-2023-11, Rescindment of a System of Records." Follow the instructions provided on the screen. Please include your name, company name (if any), and "Notice-ID-2023-11, Rescindment of a System of Records" on your attached document.

FOR FURTHER INFORMATION CONTACT: Call or email the GSA Chief Privacy Officer, Richard Speidel: telephone 202-969-5830; email gsa.privacyact@gsa.gov.

SUPPLEMENTARY INFORMATION: The information in the GSA/OAP-4 FedBizOps SORN is now obsolete as all relevant records are now maintained in a different system, GSA's *SAM.gov*. It should be removed from GSA's inventory once OMB approves via ROCIS (OMB OIRA—Office of Information and Regulatory Affairs).

SYSTEM NAME AND NUMBER:

GSA/OAP-4FedBizOps.

HISTORY:

73 FR 22386 on 04/24/2008.

Richard Speidel,

Chief Privacy Officer, Office of the Deputy Chief Information Officer, General Services Administration.

[FR Doc. 2023-20048 Filed 9-14-23; 8:45 am]

BILLING CODE 6820-34-P

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Agency for Healthcare Research and Quality

Meeting of the National Advisory Council for Healthcare Research and Quality

AGENCY: Agency for Healthcare Research and Quality (AHRQ), HHS.

ACTION: Notice of public meeting.

SUMMARY: This notice announces a meeting of the National Advisory Council for Healthcare Research and Quality.

DATES: The meeting will be held on Thursday, November 16, 2023, from 10 a.m. to 3:30 p.m.

ADDRESSES: The meeting will be held in-person.

FOR FURTHER INFORMATION CONTACT:

Jaime Zimmerman, Designated Federal Official, at the Agency for Healthcare Research and Quality, 5600 Fishers Lane, Mail Stop 06E37A, Rockville, Maryland, 20857, (301) 427-1456. For press-related information, please contact Bruce Seeman at (301) 427-1998 or Bruce.Seeman@AHRQ.hhs.gov.

Closed captioning will be provided during the meeting. If another reasonable accommodation for a disability is needed, please contact the Food and Drug Administration (FDA) Office of Equal Employment Opportunity and Diversity Management on (301) 827-4840, no later than Tuesday, October 31, 2023. The agenda, roster, and minutes will be available from Jenny Griffith, Committee Management Officer, Agency for Healthcare Research and Quality, 5600 Fishers Lane, Rockville, Maryland 20857. Jenny Griffith's phone number is (240) 446-6799.

SUPPLEMENTARY INFORMATION:

I. Purpose

In accordance with the Federal Advisory Committee Act, this notice announces a meeting of the National Advisory Council for Healthcare Research and Quality (the Council). 5 U.S.C. 1009. The Council is authorized by section 941 of the Public Health Service Act, 42 U.S.C. 299c. In accordance with its statutory mandate, the Council is to advise the Secretary of the Department of Health and Human Services and the Director of AHRQ on matters related to AHRQ's conduct of its mission including providing guidance on (A) priorities for health care research, (B) the field of health care research including training needs and information dissemination on health care quality and (C) the role of the Agency in light of private sector activity and opportunities for public private partnerships. The Council is composed of members of the public, appointed by the Secretary, and Federal ex-officio members specified in the authorizing legislation.

II. Agenda

On Thursday, November 16, 2023, NAC members will meet to conduct preparatory work prior to convening the Council meeting at 10:45 a.m., with the call to order by the Council Chair, an introduction of NAC members, and approval of previous Council summary

Appendix B

Newspaper Advertisements

Client Name: / PO# GSAENVIRONMENTAL

Advertiser: Jacobs

Section/Page/Zone: Legal Notice Classified/2013/ALL

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CAREERS

Talk it up: Speaking at work? Keep it simple to avoid nerves, bad habits

Like it or not, speaking is an essential skill that can be used in your professional and personal lives. Taking the time to work on the ability to speak publicly will make you more marketable on a job hunt or even more valuable in your current position.

"You have to make it work using what you have," says speaking coach Joan Detz, adding that there are several basic tools used when giving a speech: words, voice, body language, eye contact and — in some cases — props.

These tools can help your presentation out but, like any tool, there are ways to use them incorrectly.

Also, it's important to remember to keep your thesaurus in check and your cliches to a minimum. Fancy words or extraneous phrases may make you feel smarter, but they distract an audience.

"These people are already listening to you," says Detz. "There's no reason to use something like 'at this juncture in time' when you can just say 'now.'"

Clean it up

When giving a speech, eliminate little ticks, including "like" and "um."

Have someone listen to your speech and count your ticks, then work on your speech repeatedly until you feel comfortable enough to speak clearly without using verbal ticks as a crutch.

Turning away from the audience can be detrimental to any presentation. If the audience gives you their undivided attention, you should do the same. Try to keep eye contact as much as possible. But you need your notes, right? Sure, but put your notes only on the top half of a sheet of paper so you're not looking further down than you need to.

Get their attention

Your dedication to maintaining a high audience awareness will hold

your listener's interest, but how do you grab their attention in the first place? Consider taking a statistic related to your presentation and making it resonate with your audience.

If you're speaking about healthcare, for example, you could open with something like "in the hour we're here, 12 people from our community will go to the emergency room. Just make sure your statistics are correct and placed in the proper context."

— Marco Buscaglia



Dreamstime

INFORMATION TECHNOLOGY >>

Sr. Principal, SW Eng Omnium
Chicago, IL Apply online or by mail

THE NORTHERN TRUST COMPANY - seeks a Sr. Principal, SW Eng Omnium to design, develop, test, and deploy software solutions. Propose new designs and modify existing ones to continuously improve performance, functionality, and stability of systems. Design and develop high-performance programming language components used by trading applications. Build real time desktop applications capable of handling large volumes of streaming data. Perform multi-threaded application design and development, including testing and deployment phases. Act as the principal designer for major systems and their subsystems. Provide technical expertise to support and enhance core trading applications. Position requires a Bachelor's degree in Computer Science, Electronic Engineering, Information Systems, or a related STEM field, and 3 years of experience working with end-to-end BI Tools including Microsoft SQL Server, Integration Services, Reporting Services and Analytical Services. Experience must include a minimum of: 3 years of experience with coding and debugging software applications; 3 years of experience with Data modeling and Data Warehousing; 3 years of experience with SQL Scripting abilities. Stored Procedures, views, data aggregation and manipulation through SQL queries/joins; 3 years of experience working with various data sources for extraction, manipulation, and loading using SSIS/ETL Tools; 3 years of experience with creating complex paginated, drill down and drill through reports using SSRS; 3 years of experience with designing, developing, and publishing Power BI reports and Dashboards; 3 years of experience with the software development life cycle, client area functions and systems, and applications program development technological alternatives; and 3 years of experience with continuous integration and collaboration tools such as JIRA, Bitbucket, GitHub, and Confluence. Telecommuting benefit available. To apply, please visit: <https://careers.northerntrust.com> and enter job requisition number 23067 when prompted. Alternatively, please send your resume, cover letter, and a copy of the ad to: Lora Duffer, 181 W. Madison, Chicago, IL 60602.

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Oak Brook, IL Apply by Email

ASPIRE SYSTEMS, INC. - Test customized software. Req: Bachelors or foreign equivalent in Comp Sci, Electrical/Electronics Engineering, Math, or related field. 3 years exp in related. Exp. in working w/various phases of the Software Testing Life Cycle & should have worked w/automation tools & multiple QA methodologies like Selenium, Tricentis TOSSCA, Cucumber, Adobe Genie, Sikuli, Appium, Protractor, MueX Tool, Cypress IO & Ranorex JMeter, Load runner, Performance Center, New Relic, Grafana, DataDog, Dynatrace, C#, Java, Ruby & JavaScript, MS Unit, NUnit, TestNG, SQL, MySQL & Oracle, SVN, Git, Visual Studio, Eclipse, Ruby Mine, ALM 11.0, Rally, OQCompass, JIRA, qTest, Windows, Mac, HTML, XML, .Net, Web, Mobile Native & Web Apps, Windows CE devices, POS. submit C.V. to careers.us@aspresys.com.

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BLUECROSS AND BLUESHIELD ASSOCIATION - Tech Solutions Lead for BlueCross and Blueshield Association in Chicago, IL to be responsible for delivering Enterprise Information Technology (EIT) technical solutions initiatives in the full software development life cycle. Requires: Bachelor's degree in Computer Science, Electronic Engineering, Information Technology or related field (willing to accept foreign education equivalent) plus seven (7) years of experience in software application design and implementation or, alternatively, a Master's degree and five years of experience as noted above. Work-from-home 85 percent with in-office required 15 percent. Submit resume to norman.timonera@bccbsa.com. Reference Position Number: 000691.

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MANAGEMENT >>

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Manager (Service Now Consulting)
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A.T. KEARNEY, INC. - has multi openings for Manager - Practice Aligned(s) in Chicago, IL (with extensive travel and/or possible relocation in unanticipated locations throughout the U.S.) to specialize in providing management-consulting services to private and public organizations. Conduct organizational studies and evaluations and develop solutions or alternative methods to assist management in operating more efficiently and effectively. Telecommuting is permitted. Requirement: Bach's deg or frgn equiv in Economics, Engineering, Management, Business, Information Technology or rtdt quant fld and 3 yrs exp in Economics, Business, Engineering, Management, Information Technology or rtdt fld. Exp to include: Experience leading cross-functional projects/teams; Conducts extensive primary and secondary research; drives strategic decisions for clients (E.G. Cost structure assessment, operational improvement strategy, organizational restructuring); Collaborates in an international setting to better understand or serve global needs of clients; Develops business case and cost-benefit analysis for new processes, organization or systems roll-out; Executes detailed project plans to assure successful delivery. Apply online at www.kearney.com. Reference [Job ID #ILO15].

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LEGAL NOTICES

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NOTICE OF PUBLIC HEARING AND NOTICE OF AVAILABILITY FOR THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE BUILDINGS AT 202, 214 AND 220 SOUTH STATE STREET, CHICAGO, ILLINOIS

The U.S. General Services Administration (GSA), in cooperation with the Federal Protective Service (FPS) and in accordance with the National Environmental Policy Act (NEPA), announces the availability, and opportunity for public review and comment, of the Draft Environmental Impact Statement (DEIS) for the buildings at 202, 214, and 220 South State Street, Chicago, Illinois.

GSA will hold a public hearing for the Draft EIS on Monday, October 2, 2023, from 3:00 p.m. to 5:00 p.m. CDT at the Morrison Conference Center in the Metcalfe Federal Building at 77 West Jackson Boulevard, Chicago, Illinois. Registration at https://gsa-south_state-street-public-hearing.eventbrite.com is required to attend the hearing in person or participate virtually. Scan the QR code to the right to register.

GSA is providing a 45-day opportunity for public review and comment of the Draft EIS. The comment period opens September 15, 2023 and closes October 31, 2023. An electronic copy of the Draft EIS is available and can be viewed online at <https://tinyurl.com/GSA-202-220-StateStreet> or by scanning the QR code to the right.

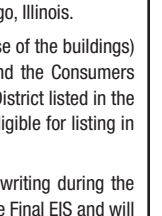
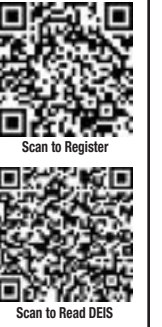
The Draft EIS analyzes the potential environmental impacts of a Proposed Action by GSA to address the future of the vacant buildings GSA owns at 202, 214, and 220 South State Street between Adams Street and Jackson Boulevard, adjacent to the Everett McKinley Dirksen Federal Courthouse in downtown Chicago, Illinois.

GSA is considering two action alternatives (Alternative A, Demolition or Alternative B, Viable Adaptive Reuse of the buildings) and a No Action Alternative. Two of the buildings are the Century Building (202 South State Street) and the Consumers Building (220 South State Street), which are historic resources that contribute to the Loop Retail Historic District listed in the National Register of Historic Places. In this proposed action, 214 South State Street is being treated as eligible for listing in the National Register of Historic Places as a contributing resource to the Loop Retail Historic District.

Comments regarding the environmental impacts of the Proposed Action may be presented orally or in writing during the hearing, by email, and by mail. All comments received will be considered by GSA in the development of the Final EIS and will be part of the public record.

Please direct any questions or comments regarding the Draft EIS to:

- Email: statestreet@gsa.gov
- Mail: Joseph Mulligan, U.S. General Services Administration, 230 S. Dearborn St., Suite 3600, Chicago, IL 60604



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Senior Electrical Engineer
(Original & Promotional)

Application Filing Period: September 22, 2023 through October 6, 2023. **Examination Date:** November 11, 2023. **Location:** Chicago High School for Agricultural Sciences (CHAS), 3857 West 111th Street, Chicago, IL. **Scope of Examination:** Knowledge of Senior Electrical Engineer practices. **Nature of Position and Duties:** Under supervision, operates or assists in the operation of assigned mechanical equipment at a sewage treatment plant, sludge disposal facility or pumping station, and checks various components of the equipment for normal condition and operation. **Salary:** \$56,73 per hour

Senior Mechanical Engineer
(Original & Promotional)

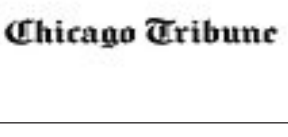
Application Filing Period: September 22, 2023 through October 6, 2023. **Examination Date:** November 2, 2023 - November 4, 2023. **Location:** MWRD Main Office Building Annex, 111 East Erie, Chicago, IL. **Scope of Examination:** Knowledge of Senior Mechanical Engineer practices. **Nature of Position and Duties:** Performs supervisory and professional electrical engineering work. Prepares studies, designs, economic analyses and other reports; performs resident engineer duties; and supervises the maintenance and operations of electrically operated equipment, electric distribution equipment and systems and computer control and data acquisition systems. **Salary:** \$109,195.06 per year

Senior Structural Engineer
(Original & Promotional)

Application Filing Period: September 22, 2023 through October 6, 2023. **Examination Date:** November 2, 2023 - November 4, 2023. **Location:** MWRD Main Office Building Annex, 111 East Erie, Chicago, IL. **Scope of Examination:** Knowledge of Senior Structural Engineer practices. **Nature of Position and Duties:** Performs supervisory professional structural engineering work in connection with the design, layout, preparation of plans and estimates and erection or alteration of structural steel, timber, concrete and reinforced concrete structures. **Salary:** \$109,195.06 per year

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LEGAL NOTICES
GOVERNMENT/EDUCATION

The Metropolitan Water Reclamation District of Greater Chicago will be accepting applications for the following classification(s):

IT Security Administrator
(Original & Promotional)

Application Filing Period: September 15, 2023 through September 29, 2023. **Examination Date:** October 28, 2023. **Location:** Chicago High School for Agricultural Sciences (CHAS), 3857 West 111th Street, Chicago, IL. **Scope of Examination:** Knowledge of IT Security Administrator practices. **Nature of Position and Duties:** Ensures the secure operation of the in-house computer systems, servers, and network connections. This includes checking server and firewall logs, scrutinizing network traffic, establishing and updating virus scans and troubleshooting. This position also analyzes and resolves security breaches and vulnerability issues in a timely and accurate fashion and conducts user activity audits where required. **Salary:** \$97,826.30 per year

Operating Engineer I
(Original & Promotional)

Application Filing Period: September 22, 2023 through October 6, 2023. **Examination Date:** November 11, 2023. **Location:** Chicago High School for Agricultural Sciences (CHAS), 3857 West 111th Street, Chicago, IL. **Scope of Examination:** Knowledge of Operating Engineer I practices. **Nature of Position and Duties:** Under supervision, operates or assists in the operation of assigned mechanical equipment at a sewage treatment plant, sludge disposal facility or pumping station, and checks various components of the equipment for normal condition and operation. **Salary:** \$56,73 per hour

Senior Electrical Engineer
(Original & Promotional)

Application Filing Period: September 22, 2023 through October 6, 2023. **Examination Date:** November 2, 2023 - November 4, 2023. **Location:** MWRD Main Office Building Annex, 111 East Erie, Chicago, IL. **Scope of Examination:** Knowledge of Senior Electrical Engineer practices. **Nature of Position and Duties:** Performs supervisory and professional electrical engineering work. Prepares studies, designs, economic analyses and other reports; performs resident engineer duties; and supervises the maintenance and operations of electrically operated equipment, electric distribution equipment and systems and computer control and data acquisition systems. **Salary:** \$109,195.06 per year

Senior Mechanical Engineer
(Original & Promotional)

Application Filing Period: September 22, 2023 through October 6, 2023. **Examination Date:** November 2, 2023 - November 4, 2023. **Location:** MWRD Main Office Building Annex, 111 East Erie, Chicago, IL. **Scope of Examination:** Knowledge of Senior Mechanical Engineer practices. **Nature of Position and Duties:** Performs supervisory and professional electrical engineering work. Prepares studies, designs, economic analyses and other reports; performs resident engineer duties; and supervises the maintenance and operations of electrically operated equipment, electric distribution equipment and systems and computer control and data acquisition systems. **Salary:** \$109,195.06 per year

Senior Structural Engineer
(Original & Promotional)

Application Filing Period: September 22, 2023 through October 6, 2023. **Examination Date:** November 2, 2023 - November 4, 2023. **Location:** MWRD Main Office Building Annex, 111 East Erie, Chicago, IL. **Scope of Examination:** Knowledge of Senior Structural Engineer practices. **Nature of Position and Duties:** Performs supervisory professional structural engineering work in connection with the design, layout, preparation of plans and estimates and erection or alteration of structural steel, timber, concrete and reinforced concrete structures. **Salary:** \$109,195.06 per year

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BUSINESS & SERVICE DIRECTORY

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Engineering Group 02625 Butterfield Road, Suite 099W, Oak Brook, IL 60523 is seeking qualified candidates to provide professional estimating and subcontract engineering services for the City of Joliet Water Distribution System Rehabilitation Program. Subcontracting opportunities include the following areas: construction engineering, field inspection and materials testing. DBE/MBE/WBE firms should contact: Mr. Greg Serrano at gserrano@thomas-engineering.com provide their qualifications prior to October 4, 2023. Responses will be evaluated based on similar work experience (50%), scope of work (30%), past City of Joliet experience (10%), and availability (10%). 855-533-1700

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GENERAL SERVICES

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Cook County - Chgo. W
DIVISION BY AUSTIN, 1 m Studio w/ sep kitchen & full bath on bus and train line. \$625/mo. Tenant pays utilities. Call 708-307-2440

Cook County - Suburban

2 bed/1 bath in Burbank, IL. Heat, gas, and water included. \$1300/mo. two months security deposit. Credit check required & no pets. Email: gienpropertiesllc@gmail.com or call 708-671-8826

Lake County

Round Lake Beach, IL Cedar Villas is accepting applications for subsidized 1BR Apt. waiting list for seniors 62 years or older and the disabled. Rent is based on 30% of annual income. For details, call us 847-546-1899

Round Lake Beach, IL Cedar Villas is accepting applications for Subsidized 2 and 3 bedroom apt waiting list. Rent is based on 30% of annual income for qualified applicants. Contact us at 847-546-1899 for details.

Apartments, Furnished
Cook County - Chgo. S

Crossroads Hotel SRO
SINGLE RMS Private bath, PHONE, CABLE & MAIDS
1 Block to Orange Line
5300 S. Pulaski 773-581-1188

Ashland Hotel: Nice clean rms.
24 hr desk/maid/TV/laundry/air. Low rates daily/weekly/monthly. South Side. Call 773-378-5200

Rooms
Cook County - Chgo. S

PULLMAN AREA 111th St., East of King Dr. Near shops & 1/4 blk to metro. Newly remod rooms. \$575-865/mo. 773-340-9313

Downtown Hyde Park
Hyde Park Arms Residential Hotel, 5316 S. Harper, elev. bldg fully furnished, cable avail, fridge, priv. BA, Indry, \$165 & up/wk, \$350/mo-wk, \$725/mo. 773-493-3500/1 anytime

Furn rooms, 45+ male pref, utils incl., cable ready, near Whole Foods, Starbucks, Green Line & buses. From \$410. 331-321-6587

Sleeping Rooms
Cook County - Chgo. N

BIG ROOM with stove, fridge, bath & nice wood floors. Near Red Line & Buses, Elevator & Laundry, Shopping. \$128/wk + up. 773-561-4970

NICE ROOM w/stove, fridge & bath Near Aldi, Walgreens, Beach, Red Line & Buses, Elevator & Laundry. \$135/wk + up. 773-275-4442

Cook County - Chgo. W

CLEAN ROOM w/fridge & micro, Near Oak Park, Food-4-Less, Walmart, Walgreens, Buses & Metra, Laundry. \$125/wk & up. 773-637-6957

Rental Misc.
Cook County - Chgo. W

Division by Austin, 1100sqft + private office. Plumbing from previous occupant (nail salon). \$1100/mo + utils. 708-307-2440

AUTOMOTIVE

Autos
2013 Hyundai Sonata, automatic selling price \$2300 T, L & F AT FirstMarshallAutoAuction.com. (708)333-2266. Silver

2015 Kia Rio, automatic, selling price \$1900 T, L & F AT FirstMarshallAutoAuction.com (708)333-2266. Black

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**FOR BEST DEAL CALL THE OWNER
ARELI TORRES 630-346-5650**

Autos

2015 Nissan Versa, automatic selling price \$1900 T, L & F AT FirstMarshallAutoAuction.com (708)333-2266. Blue

Autos

Autos

FirstMarshallAutoAuction.com

- 398 E 147th St., Harvey, IL 60426
- 2012 Chevrolet Malibu, auto, price \$1700
- 2011 Nissan Rogue, auto, selling price \$1900
- 2014 Ford Focus, automatic, price \$1800
- 2011 Buick Enclave, automatic, price \$2500
- 2013 Dodge G. caravan, 7pass, auto, \$1700
- 2013 Ford F-150 Pickup crew Cab, 4x4, \$4500

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We are not affiliated with any government office.
All the prices listed above are excluding T, L & F.

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2014 Chevrolet Express Cargo Van, auto, selling price \$3300 T, L & F AT FirstMarshallAutoAuction.com (708)333-2266. Blue

2010 Lincoln MKX, automatic, selling price \$1800 T, L & F AT FirstMarshallAutoAuction.com (708)333-2266. Black

Public Notices

NOTICE OF PUBLIC HEARING AND NOTICE OF AVAILABILITY FOR THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE BUILDINGS AT 202, 214 AND 220 SOUTH STATE STREET, CHICAGO, ILLINOIS

The U.S. General Services Administration (GSA), in cooperation with the Federal Protective Service (FPS) and in accordance with the National Environmental Policy Act (NEPA), announces the availability, and opportunity for public review and comment, of the Draft Environmental Impact Statement (DEIS) for the buildings at 202, 214, and 220 South State Street, Chicago, Illinois.

GSA will hold a public hearing for the Draft EIS on Monday, October 2, 2023, from 3:00 p.m. to 5:00 p.m. CDT at the Morrison Conference Center in the Metcalle Federal Building at 77 West Jackson Boulevard, Chicago, Illinois. Registration at https://GSA-South_State_Street-Public-Hearing.eventbrite.com is required to attend the hearing in person or participate virtually. Scan the QR code to the right to register.

GSA is providing a 45-day opportunity for public review and comment of the Draft EIS. The comment period opens September 15, 2023 and closes October 31, 2023. An electronic copy of the Draft EIS is available and can be viewed online at: https://tinyurl.com/GSA-202-220-StateStreet or by scanning the QR code to the right.

The Draft EIS analyzes the potential environmental impacts of a Proposed Action by GSA to address the future of the vacant buildings GSA owns at 202, 214, and 220 South State Street between Adams Street and Jackson Boulevard, adjacent to the Everett McKinley Dirksen Federal Courthouse in downtown Chicago, Illinois.

GSA is considering two action alternatives (Alternative A, Demolition or Alternative B, Viable Adaptive Reuse of the buildings) and a No Action Alternative. Two of the buildings are the Century Building (202 South State Street) and the Consumers Building (220 South State Street), which are historic resources that contribute to the Loop Retail Historic District listed in the National Register of Historic Places. In this proposed action, 214 South State Street is being treated as eligible for listing in the National Register of Historic Places as a contributing resource to the Loop Retail Historic District.

Comments regarding the environmental impacts of the Proposed Action may be presented orally or in writing during the hearing, by email, and by mail. All comments received will be considered by GSA in the development of the Final EIS and will be part of the public record.

Please direct any questions or comments regarding the Draft EIS to:
• Email: statetstreet@gsa.gov
• Mail: Joseph Mulligan, U.S. General Services Administration, 230 S. Dearborn St., Suite 3600, Chicago, IL 60604

Bid Notice

The Board of Education of Crete-Monee School District 201-U, Will County, Illinois, is requesting and accepting sealed bids from qualified Contractors for a Winter Break Abatement Project at The Early Learning Center, 1500 S Sangamon Street, Crete, Illinois 60417

Bids are to be addressed to:
**Crete-Monee School District 201-U
Maintenance and Receiving Building
295 W Burville Rd.
Crete, IL 60417**

Attn: Keith McLean – Director of Buildings and Grounds
Bids will be opened publicly at the Crete-Monee School District 201-U Maintenance Building, 295 W Burville Rd, Crete, IL 60417 at 2:00 pm local time on October 3 rd, 2023. Bids not received by 2:00 pm local time on Thursday, October 3 rd, 2023 will become the property of the district and will not be opened and will not be returned. There will be a pre-bid walkthrough at 10:30 am on September 25 th, starting at the Early Learning Center, Main Entrance, 1500 South Sangamon Street, Crete, IL 60417 Door #1

Bid Specifications will be available at the Crete-Monee Maintenance Department, 295 W. Burville Rd Crete, Illinois and on the Crete-Monee School District 201-U website: www.cm201u.org on September 18 th, 2023. Bidders retrieving their packet online must check the district website post location for updates and/or addendums. The Board of Education for Crete-Monee School District 201-U reserves the right to reject any and all bids, and to waive any formalities in the bidding process. 9/19/2023 #1162321



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CLASSIFIEDS 312.321.2345

LEGAL

Assumed Name

ASSUMED NAME
Notice is hereby given, pursuant to "An Act in relation to the use of an Assumed Business Name in the conduct or transaction of Business in the State," as amended, that a certification was registered by the undersigned with the County Clerk of Cook County.

Registration Number: Y23011049 on September 28, 2023
Under the Assumed Business Name of

DOMONIQUE MICHELLE THORNHILL
with the business located at: 15826 S LAGRANGE RD 127 ORLAND PARK, IL 60462, PO BOX 2427, ORLAND PARK, IL 60462. The true and real full name(s) and residence address of the owner(s)/partner(s) is: DOMONIQUE THORNHILL, 16965 JASMINE LANE, ORLAND HILLS, IL 60487, USA 9/29, 10/6, 10/13/2023 #1162779

ASSUMED NAME
Notice is hereby given, pursuant to "An Act in relation to the use of an Assumed Business Name in the conduct or transaction of Business in the State," as amended, that a certification was registered by the undersigned with the County Clerk of Cook County.

Registration Number: Y23011002 on September 18, 2023
Under the Assumed Business Name of

PSYCHIC GALLERY
with the business located at: 656 W ALGONQUIN RD, DES PLAINES, IL 60016. The true and real full name(s) and residence address of the owner(s)/partner(s) is: TINA JOHNS, 1473 WHITMAN CT, SCHAUMBURG, IL 60173, USA 9/22, 9/29, 10/6/2023 #1162442

ASSUMED NAME
Notice is hereby given, pursuant to "An Act in relation to the use of an Assumed Business Name in the conduct or transaction of Business in the State," as amended, that a certification was registered by the undersigned with the County Clerk of Cook County.

Registration Number: Y23010976 on September 13, 2023
Under the Assumed Business Name of

MCLEAN LITTLE STORE
with the business located at: 2037 N. Cicero Ave, Chicago, IL, 60639. The true and real full name(s) and residence address of the owner(s)/partner(s) is: RUTH HERNANDEZ, 2037 N. CICERO AVE, CHICAGO, IL, 60639 USA 9/22, 9/29, 10/6/2023 #1162377

ASSUMED NAME
Notice is hereby given, pursuant to "An Act in relation to the use of an Assumed Business Name in the conduct or transaction of Business in the State," as amended, that a certification was registered by the undersigned with the County Clerk of Cook County.

Registration Number: Y23010979 on September 13, 2023
Under the Assumed Business Name of

KAT & JEN NAILS
with the business located at: 235 W GOLF RD SUITE 155, SCHAUMBURG, IL 60195. The true and real full name(s) and residence address of the owner(s)/partner(s) is: SOON OK KIM, 1370 MEYER RD, HOFFMAN ESTATES, IL 60169 9/22, 9/29, 10/6/2023 #1162231

Name Change

Cook County Change of Name State of Illinois
County of Cook
In The Circuit Court For Cook County, Illinois
In The Matter of the Petition of Jessica Schneider
Case # 20232002873
For Change of Name.
Notice of Publication
Public Notice is hereby given that on October 24, 2023, at 10:00 am, being one of the return days in the Circuit Clerk of the County of Cook, I will file my petition in said court praying for the change of my name from Jessica Blair Schneider, to that of Jesekah Blair O'Donnell, pursuant to the statute in such case made and provided.

Dated at Evanston, Illinois, September 19th, 2023.
Signature of Petitioner /s/ Jessica Schneider
9/22, 9/29, 10/6/2023 #1160952

Probate

State of Illinois
In The Circuit Court of Cook County, Illinois
Probate Division
In the matter of the estate of Ernesto Sosa Arceo (Deceased)
Case No. 2023 P 005181
Publication Notice
Notice is hereby given that on the date of the first publication of this notice and any claim not filed within that period is barred. Copies of any claim filed with the Clerk must be mailed or delivered to the representative and to the attorney within 10 days after it has been filed.
/s/ Isabel Vallejo (Representative)
/s/ Cary A. Lind (Attorney)
9/22, 9/29, 10/6/2023 #1162476

Claims against the estate may be filed in the office of the Clerk of the Circuit Court in Room 1202, Richard J. Daley Center, Chicago, Illinois 60602, or with the representative, or both, on or before March 22, 2024, which date is not less than 6 months from the date of the first publication of this notice and any claim not filed within that period is barred. Copies of any claim filed with the Clerk must be mailed or delivered to the representative and to the attorney within 10 days after it has been filed.
/s/ Isabel Vallejo (Representative)
/s/ Cary A. Lind (Attorney)
9/22, 9/29, 10/6/2023 #1162476

Storage - Legal

SSII 1600 Busse Rd, LLC will hold an online auction to enforce a lien imposed on said property, as described below, pursuant to the Illinois Self-Storage Facility Act, Illinois Code 770 ILCS 95/1 to 95/7 on or after 12:30p.m, October 17th, 2023 at SmartStop Self Storage, 1600 Busse Rd, Elk Grove Village, IL 60007, 224-906-9586. All interested bidders may go to www.selfstorageauction.com to register and see photos of the items available for sale. Management reserves the right to withdraw any unit from sale.
Aleksandar Vukajlovic 4093, Ryan O'Connor 3157, Heather Colwell 2178, and Coleman Hallom 3045
9/22, 9/29/2023 #1162435

SST II 240 W Army Trail Rd, LLC will hold an online auction to enforce a lien imposed on said property, as described below, pursuant to the Illinois Self-Storage Facility Act, Illinois Code 770 ILCS 95/1 to 95/7 on or after 10:30a.m, October 17th, 2023 at SmartStop Self Storage, 240 W Army Trail Rd, Bloomington, IL 60108, 630-947-5714. All interested bidders may go to www.selfstorageauction.com to register and see photos of the items available for sale. Management reserves the right to withdraw any unit from sale.
Frederick Tunk C002, Alexandra Monaco C041, Stacey Peters C073
9/22, 9/29/2023 #1162434

Storage - Legal

ister and see photos of the items available for sale. Management reserves the right to withdraw any unit from sale.
Frederick Tunk C002, Alexandra Monaco C041, Stacey Peters C073
9/22, 9/29/2023 #1162434

Public Notices

NOTICE OF AVAILABILITY OF AUDIT REPORT OF CALUMET TOWNSHIP

Calumet Township hereby provides public notice that an audit of its funds for the period April 1, 2022 to March 31, 2023 has been made, and that a report of such audit dated September 29, 2023 has been filed with the County Clerk of Cook County, in accordance with 30 ILCS 150.01 et seq. The full report of the audit is available for public inspection at 2353 York Street, Blue Island, IL 60406 during regular business hours between 10:00 A.M. to 4:00 P.M. Monday through Friday, except for Holidays.
9/29/2023 #1162768

Public Notices

Community Reinvestment Act ("CRA") regulations require a bank that has developed a CRA Strategic Plan (the "Plan") to publish Notice of the Plan and solicit formal written public comment for at least a 30-day period. Western Alliance Bank (the "Bank") hereby provides notice of its intention to submit a CRA Strategic Plan to the Federal Reserve Bank (the "FRB"). Written comments from the public concerning the Plan are encouraged. Requests for copies of the Plan or to share comments regarding the Plan should be directed to Craig Robinson, Head of Community Relations, by mail or phone, at 1 East Washington Street, Suite 1400, Phoenix, Arizona 85004, (408) 689-8417. Comments received on or before October 29, 2023 will be considered prior to submission of the Plan for approval to the FRB.
9/29/2023 #1162451

Public Notices

CRESTWOOD PUBLIC LIBRARY DISTRICT TREASURER'S ANNUAL STATEMENT OF RECEIPTS AND DISBURSEMENTS FOR THE FISCAL YEAR BEGINNING JULY 1, 2022, AND ENDING JUNE 30, 2023. The undersigned, Suzanne Bleskin, being duly sworn on oath deposes and states as follows: 1. That she is the duly appointed, qualified and acting treasurer of the Crestwood Public Library District, Crestwood, Illinois, and by virtue of said office receives funds and disburses funds on behalf of said Public Library District; 2. That in compliance with the Public Funds Statement Publication Act 30 ILCS 151/1 et al, that she has prepared the annual statement of receipts and disbursements for the year beginning the first day of July, 2022, and ending the thirtieth day of June, 2023. 3. That the following identifies all monies received by the Crestwood Public Library District including stating the source and the amount received in combining all funds together; 4. That the following identifies all monies paid out to vendors of the Crestwood Public Library District where such total amount paid during the fiscal year beginning July 1, 2022, and ending June 30, 2023, exceed \$2,500 in the aggregate, naming the vendor and indicating the amount paid and the account charged as well as combine all funds together; 5. That the following identifies all vendors of the Crestwood Public Library District receiving less than \$2,500 combined and reported as below as all other disbursements less than \$2,500; 6. That the following identifies all monies paid as compensation, personal services, listing the name and compensation received by every elected/appointed official and employee breaking out payroll in categories of under \$25,000; 7. Total Payroll: \$74,999; Balance on hand July 1, 2022, \$1,139,734.06; Receipts: Real Estate Taxes: 552,388.17; Replacement Taxes: 21,523.80; Overdue Fines: 1,804.37; Copier Income: 3,974.68; Interest: 23,292.29; Interest on Investments: 14,044.77; Total Receipts: 617,028.98; Total Cash Available: 1,756,763.04; Payments: Payroll Under \$25,000: Margaret G., Joanne H., Liam K., Hannah K., Julia M., Kenneth S., \$25,000 or more: Deborah F., Johnathan S., Kathryn G., Daniel P., Total Payroll: 242,472.49; General: IMRF - 29,848.56; SWAN 19,904.87; Baker & Taylor 17,885.58; QuickBooks Payroll Service 13,677.55; Roy Erikson Outdoor Maint. 12,371.25; Comcast Business 10,806.62; Utica National Insurance Group 9,718.00; AT&T 9,499.16; Hearne & Assoc. 8,825.00; Versatile Computer Services 8,268.49; MicroMarketing 6,717.93; Cygan-Hayes, Ltd. 6,035.00; NICOR 5,137.24; Cengage Learning 4,792.59; Overdrive 4,432.20; Bankcard Processing Center 3,541.18; Juniper 3,347.43; Juniper 3,347.43; Juniper Guild 3,342.92; TBS 3,341.40; COMED 3,297.82; Amazon 3,031.45; Service Master 2,838.00; Midwest Tape 2,609.85; Total for amounts to Vendors more than \$2,500: 193,270.10; amounts to Vendors totaling less than \$2,500: 49,073.68; Total General Disbursements \$242,343.66; Total Disbursements and Payroll \$484,616.15; Actual Balance on Hand June 30, 2023 \$1,271,946.89; 7. That the undersigned has read the above and foregoing Statement of Receipts and Disbursements and that the same is true and correct. Suzanne Bleskin, Treasurer, Board of Library Trustees; Subscribed and Sworn before me, This 25th day of September, 2023, Debbie Fisher, Notary Public. #1162757

Public Notices

Ordinance No. FY23/24/2: Ordinance Authorizing Levy of an Additional Tax for the Purchase of Sites and Buildings for the Construction and Equipment of Buildings for the Rental of Buildings Required for the Library Purposes and for the Maintenance, Repairs, and Alteration of the Library Building and Equipment; Whereas, 35-5 of Chapter 75, Act of the Illinois Compiled Statutes authorizes the levy of an additional tax of 0.02% of the taxable property in the District, as equalized or assessed by the Department of Revenue, for the purchase of sites and buildings, for the construction and equipment of buildings, for the rental of buildings required for library purposes, and for the maintenance, repairs and alterations of the Library building and equipment. Now, therefore, be it ordained by the Board of Library Trustees of the Crestwood Public Library District, Cook County, Illinois, that they hereby determine to levy an additional tax of 0.02% of the value of all the taxable property in the District, as equalized or assessed by the Department of Revenue, for the purchase of sites and buildings, for the construction and equipment of buildings, for the rental of buildings required for library purposes, and for the maintenance, repairs and alterations of the Library building and equipment. Be it further ordained that within fifteen (15) days after the adoption of this Ordinance, the Secretary shall publish it at least once in one or more newspapers published in the District, or if no newspaper is published therein, then in one or more newspapers with a general circulation within the District. Be it further ordained that if no petition is filed with the Board of Library Trustees by -October 30, 2023, thirty (30) days after the aforesaid publication, the District shall then proceed with the levy of said additional tax. However, if within the thirty (30) day period a petition is filed with the Board of Library Trustees, signed by electors of the District equal in number to 653 or more of the electors (being 10% or more of the total number of registered voters in the Library District) in the Library District, asking that the question of levying such a 0.02% tax be submitted to the electors of the District, the question shall be submitted at the Consolidated Election on April 2, 2024. If a majority of votes cast upon the question are in favor thereof, the Board of Library Trustees may levy the additional tax. The Secretary of the District shall provide a petition form to any individual requesting one. Adopted this 25th day of September, 2023, to a roll call vote as follows:
Ayes: Chillum, Bleskin, Morissette, Marsh; Nays: None; Absent: Salamone, Weber, Koepf, Susan M. Chillum, President. Attest: Barbara Weber, Secretary. Published by me this 25th day of September, 2023. State of Illinois; County of Cook; Secretary's Certificate: I, Barbara Weber, the duly qualified and acting Secretary of the Board of Library Trustees of the Crestwood Public Library District, Cook County, Illinois, and the keeper of the records thereof, do hereby certify that attached hereto is a true and correct copy of an Ordinance entitled: Ordinance No. FY23-24/2: Ordinance Authorizing Levy of an Additional Tax for the Purchase of Sites and Buildings for the Construction and Equipment of Buildings for the Rental of Buildings Required for the Library Purposes and for the Maintenance, Repairs, and Alteration of the Library Building and Equipment; adopted at the regular meeting of the said Board of Library Trustees held on the 25th day of September, 2023. In witness whereof, I have hereunto set my hand this 25th day of September, 2023. Barbara Weber, Secretary
9/29/2023 #1162776

Public Notices

Ordinance No. FY23/24/2: Ordinance Authorizing Levy of an Additional Tax for the Purchase of Sites and Buildings for the Construction and Equipment of Buildings for the Rental of Buildings Required for the Library Purposes and for the Maintenance, Repairs, and Alteration of the Library Building and Equipment; Whereas, 35-5 of Chapter 75, Act of the Illinois Compiled Statutes authorizes the levy of an additional tax of 0.02% of the taxable property in the District, as equalized or assessed by the Department of Revenue, for the purchase of sites and buildings, for the construction and equipment of buildings, for the rental of buildings required for library purposes, and for the maintenance, repairs and alterations of the Library building and equipment. Now, therefore, be it ordained by the Board of Library Trustees of the Crestwood Public Library District, Cook County, Illinois, that they hereby determine to levy an additional tax of 0.02% of the value of all the taxable property in the District, as equalized or assessed by the Department of Revenue, for the purchase of sites and buildings, for the construction and equipment of buildings, for the rental of buildings required for library purposes, and for the maintenance, repairs and alterations of the Library building and equipment. Be it further ordained that within fifteen (15) days after the adoption of this Ordinance, the Secretary shall publish it at least once in one or more newspapers published in the District, or if no newspaper is published therein, then in one or more newspapers with a general circulation within the District. Be it further ordained that if no petition is filed with the Board of Library Trustees by -October 30, 2023, thirty (30) days after the aforesaid publication, the District shall then proceed with the levy of said additional tax. However, if within the thirty (30) day period a petition is filed with the Board of Library Trustees, signed by electors of the District equal in number to 653 or more of the electors (being 10% or more of the total number of registered voters in the Library District) in the Library District, asking that the question of levying such a 0.02% tax be submitted to the electors of the District, the question shall be submitted at the Consolidated Election on April 2, 2024. If a majority of votes cast upon the question are in favor thereof, the Board of Library Trustees may levy the additional tax. The Secretary of the District shall provide a petition form to any individual requesting one. Adopted this 25th day of September, 2023, to a roll call vote as follows:
Ayes: Chillum, Bleskin, Morissette, Marsh; Nays: None; Absent: Salamone, Weber, Koepf, Susan M. Chillum, President. Attest: Barbara Weber, Secretary. Published by me this 25th day of September, 2023. State of Illinois; County of Cook; Secretary's Certificate: I, Barbara Weber, the duly qualified and acting Secretary of the Board of Library Trustees of the Crestwood Public Library District, Cook County, Illinois, and the keeper of the records thereof, do hereby certify that attached hereto is a true and correct copy of an Ordinance entitled: Ordinance No. FY23-24/2: Ordinance Authorizing Levy of an Additional Tax for the Purchase of Sites and Buildings for the Construction and Equipment of Buildings for the Rental of Buildings Required for the Library Purposes and for the Maintenance, Repairs, and Alteration of the Library Building and Equipment; adopted at the regular meeting of the said Board of Library Trustees held on the 25th day of September, 2023. In witness whereof, I have hereunto set my hand this 25th day of September, 2023. Barbara Weber, Secretary
9/29/2023 #1162776

Public Notices

Ordinance No. FY23/24/2: Ordinance Authorizing Levy of an Additional Tax for the Purchase of Sites and Buildings for the Construction and Equipment of Buildings for the Rental of Buildings Required for the Library Purposes and for the Maintenance, Repairs, and Alteration of the Library Building and Equipment; Whereas, 35-5 of Chapter 75, Act of the Illinois Compiled Statutes authorizes the levy of an additional tax of 0.02% of the taxable property in the District, as equalized or assessed by the Department of Revenue, for the purchase of sites and buildings, for the construction and equipment of buildings, for the rental of buildings required for library purposes, and for the maintenance, repairs and alterations of the Library building and equipment. Now, therefore, be it ordained by the Board of Library Trustees of the Crestwood Public Library District, Cook County, Illinois, that they hereby determine to levy an additional tax of 0.02% of the value of all the taxable property in the District, as equalized or assessed by the Department of Revenue, for the purchase of sites and buildings, for the construction and equipment of buildings, for the rental of buildings required for library purposes, and for the maintenance, repairs and alterations of the Library building and equipment. Be it further ordained that within fifteen (15) days after the adoption of this Ordinance, the Secretary shall publish it at least once in one or more newspapers published in the District, or if no newspaper is published therein, then in one or more newspapers with a general circulation within the District. Be it further ordained that if no petition is filed with the Board of Library Trustees by -October 30, 2023, thirty (30) days after the aforesaid publication, the District shall then proceed with the levy of said additional tax. However, if within the thirty (30) day period a petition is filed with the Board of Library Trustees, signed by electors of the District equal in number to 653 or more of the electors (being 10% or more of the total number of registered voters in the Library District) in the Library District, asking that the question of levying such a 0.02% tax be submitted to the electors of the District, the question shall be submitted at the Consolidated Election on April 2, 2024. If a majority of votes cast upon the question are in favor thereof, the Board of Library Trustees may levy the additional tax. The Secretary of the District shall provide a petition form to any individual requesting one. Adopted this 25th day of September, 2023, to a roll call vote as follows:
Ayes: Chillum, Bleskin, Morissette, Marsh; Nays: None; Absent: Salamone, Weber, Koepf, Susan M. Chillum, President. Attest: Barbara Weber, Secretary. Published by me this 25th day of September, 2023. State of Illinois; County of Cook; Secretary's Certificate: I, Barbara Weber, the duly qualified and acting Secretary of the Board of Library Trustees of the Crestwood Public Library District, Cook County, Illinois, and the keeper of the records thereof, do hereby certify that attached hereto is a true and correct copy of an Ordinance entitled: Ordinance No. FY23-24/2: Ordinance Authorizing Levy of an Additional Tax for the Purchase of Sites and Buildings for the Construction and Equipment of Buildings for the Rental of Buildings Required for the Library Purposes and for the Maintenance, Repairs, and Alteration of the Library Building and Equipment; adopted at the regular meeting of the said Board of Library Trustees held on the 25th day of September, 2023. In witness whereof, I have hereunto set my hand this 25th day of September, 2023. Barbara Weber, Secretary
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DESIGN

October Public Hearing For State Street's Century And Consumers Buildings

“The U.S. General Services Administration (GSA) invites you to attend a public hearing in support of an Environmental Impact Statement (EIS) to address the future of the buildings at 202, 214 and 220 South State adjacent to the Dirksen United States Courthouse in downtown Chicago. GSA, in cooperation with the Federal Protective Service, announces the availability, and opportunity for public review and comment, of the draft EIS for the future of these buildings...GSA is considering two action alternatives (Alternative A, Demolition or Alternative B, Viable Adaptive Reuse of the buildings) and Alternative C No Action.” The draft EIS is [here](#). Register for the public hearing [here](#).

Appendix C

Public Hearing Invitation



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

Public Hearing

Monday, October 2, 2023

3:00 PM to 5:00 PM CDT

You're invited!

The U.S. General Services Administration (GSA) invites you to attend a public hearing for a Draft Environmental Impact Statement (EIS) for the buildings at 202, 214, and 220 South State Street, Chicago, Illinois. The meeting will be held on Monday, October 2, 2023 from 3:00 PM to 5:00 PM CDT at the Metcalfe Federal Building's Morrison Conference Center located at 77 West Jackson Boulevard in Chicago.

The public hearing provides an opportunity for public engagement and feedback on the Draft EIS, which considers two action alternatives (Alternative A: Demolition or Alternative B: Viable Adaptive Reuse of the buildings) and a No Action Alternative.

Meeting participants can submit comments on the Draft EIS when registering for the meeting via Eventbrite, during the meeting via comment card or a court reporter, or in writing. GSA will address and incorporate public comments received as it prepares the Final EIS. Comments can be submitted via email to statestreet@gsa.gov or by mail to **Joseph Mulligan, U.S. General Services Administration, 230 S. Dearborn St., Suite 3600, Chicago, IL 60604** no later than **Tuesday, October 31, 2023**.

The Draft EIS will be available to view on the following website from September 7, 2023: <https://tinyurl.com/GSA-202-220-StateStreet>. You can also scan the QR code to the right to go to the Draft EIS.



Scan to Read DEIS

Metcalfe Federal Building's
Morrison Conference Center
77 W Jackson Boulevard
Chicago, IL 60604



Scan to Register

ADVANCE REGISTRATION IS REQUIRED TO ATTEND.

Please use the QR code above or visit Eventbrite at:
https://GSA-South_State-Street-Public-Hearing.eventbrite.com
to register.

For more information please contact statestreet@gsa.gov.

Public Hearing for the buildings at 202, 214, and 220 South State Street, Chicago, IL

Meeting Details

Monday, October 2, 2023, 3:00 PM to 5:00 PM CDT
Metcalfe Federal Building's
Morrison Conference Center
77 W Jackson Boulevard, Chicago, IL 60604

Participants may attend in-person or virtually. In-person registrants will be limited to approximately 150 due to space constraints. There is no cost.

Please note that as the Metcalfe Building is a federal building, meeting attendees will be subject to a standard security screening as they enter the building.

The building is within walking distance from LaSalle/Van Buren, Harold Washington Library-State/Van Buren and Jackson CTA "L" stops and is accessible by bus routes 7, 22, 24, 36, 62, 126, and 151.

The meeting room is accessible to persons with disabilities. Please email statestreet@gsa.gov or contact **(773) 458-2842** by September 25, 2023 to make an accommodation request.

General Services Administration
Design and Construction Project Delivery Division
230 S. Dearborn Street
Suite 3600
Chicago, Illinois 60604

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HERE

Mailing Address Line 1
Mailing Address Line 2
Mailing Address Line 3
Mailing Address Line 4
Mailing Address Line 5



Appendix D

Public Hearing Flyer



Public Hearing

You're invited!

The U.S. General Services Administration (GSA) invites you to attend a public hearing for a Draft Environmental Impact Statement (EIS) for the buildings at 202, 214, and 220 South State Street, Chicago, Illinois.

Monday, October 2, 2023

3:00 PM to 5:00 PM CDT

Metcalfe Federal Building's Morrison Conference Center

77 West Jackson Boulevard in Chicago

ADVANCE REGISTRATION IS REQUIRED TO ATTEND EITHER IN-PERSON OR VIRTUALLY

Register at <https://GSA-South State-Street-Public-Hearing.eventbrite.com> or scan the QR code.



Scan to Register

The public hearing provides an opportunity for public engagement and feedback on the Draft EIS, which considers two action alternatives (Alternative A: Demolition or Alternative B: Viable Adaptive Reuse of the buildings) and a No Action Alternative.



Scan to Read DEIS

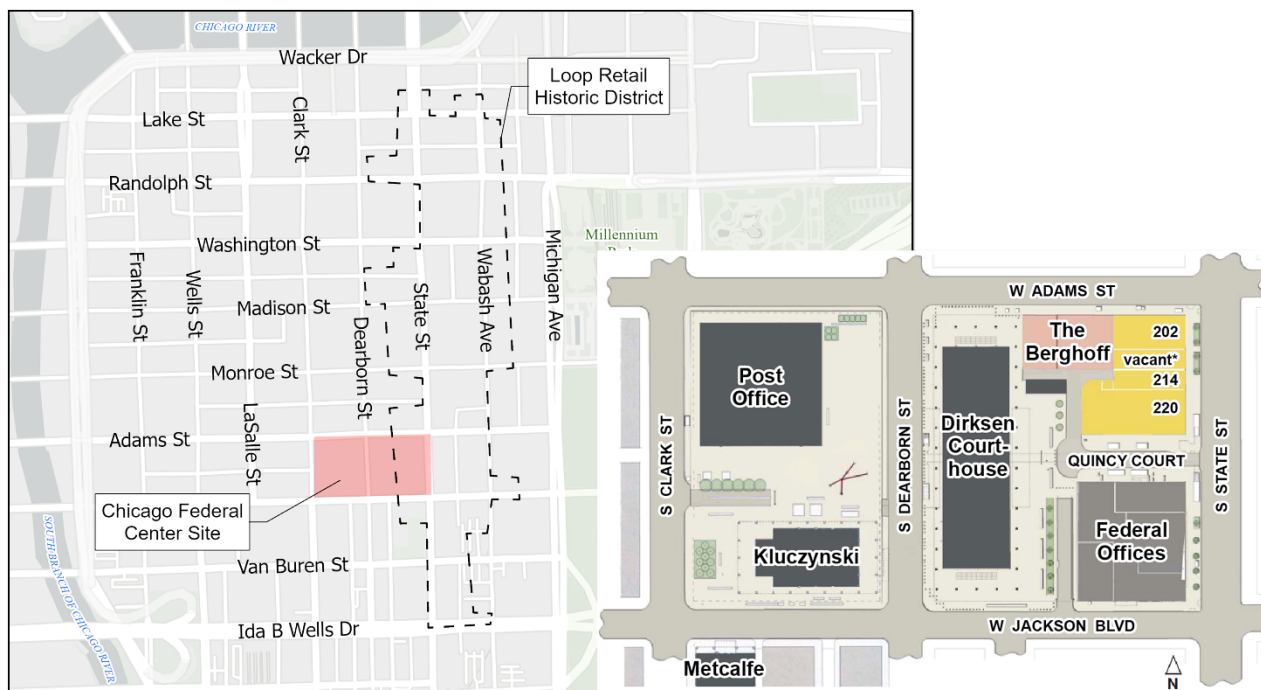
You can read the Draft EIS here: <https://tinyurl.com/GSA-202-220-StateStreet> or by scanning the QR code to the right.

Meeting participants can submit comments on the Draft EIS when registering for the meeting via Eventbrite, during the meeting via comment card or a court reporter, or in writing. GSA will address and incorporate public comments received as it prepares the Final EIS. Comments can be submitted via the electronic comment form which can be accessed via QR code or this link: <https://tinyurl.com/GSADEISComment>, by email to statestreet@gsa.gov or by mail to **Joseph Mulligan, U.S. General Services Administration, 230 S. Dearborn St., Suite 3600, Chicago, IL 60604** no later than **Tuesday, October 31, 2023**.



Scan to Comment

Site Location 202, 214, and 220 South State Street in Chicago



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

For more information, please contact statestreet@gsa.gov.

Appendix E
GSA Press Release on Public Hearing



GSA to host public hearing for 202, 214, and 220 South State Street

September 20, 2023

GSA Contact: Tanya Schusler, [312-206-6131](tel:312-206-6131) | tanya.schusler@gsa.gov

The U.S. General Services Administration (GSA) will host a public hearing on the Draft Environmental Impact Statement (EIS) as part of its ongoing engagement to address the future of three buildings at 202, 214, and 220 S. State St., adjacent to the Dirksen U.S. Courthouse in downtown Chicago. These three properties reside in the Loop Retail Historic District listed in the National Register of Historic Places.

The public is encouraged to attend and participate in the meeting on Monday, Oct. 2, from 3-5 p.m. CT, at the Morrison Conference Center on the second floor of the Ralph H. Metcalfe Federal Building, 77 W. Jackson Blvd., Chicago, Illinois. Advanced registration is required at https://GSA-South_State-Street-Public-Hearing.eventbrite.com.

The public hearing provides an opportunity for public engagement and feedback on the Draft EIS in accordance with provisions of the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. The draft EIS, which examines two action alternatives (Alternative A: Demolition or Alternative B: Viable Adaptive Reuse of the buildings) and a No Action Alternative. Meeting participants can submit comments on the Draft EIS when registering for the meeting via the Eventbrite link above, during the meeting via comment card or a court reporter, or in writing. GSA will consider all comments received in the preparation of the Final EIS.

Comments can be submitted via email to statestreet@gsa.gov or by mail to Joseph Mulligan, U.S. General Services Administration, 230 S. Dearborn St., Suite 3600, Chicago, IL 60604, no later than Tuesday, Oct. 31, 2023.

The Draft EIS is available for viewing on the following website: <https://tinyurl.com/GSA-202-220-StateStreet>.

WHAT: Draft Environmental Impact Statement Public Hearing

WHEN: Monday, Oct. 2, 2023, 3-5 p.m. CT

WHERE: Ralph H. Metcalfe Federal Building, Morrison Conference Center, 77 W. Jackson Blvd., Chicago, Illinois.

WHO: General public

HOW: Advanced registration is required via https://GSA-South_State-Street-Public-Hearing.eventbrite.com.

###

About GSA: GSA provides centralized procurement and shared services for the federal government, managing a nationwide real estate portfolio of nearly 370 million rentable square feet, overseeing about \$87 billion in products and services via federal contracts, and delivering technology services that serve millions of people across dozens of federal agencies. GSA's mission is to deliver the best customer experience and value in real estate, acquisition, and technology services to the government and the American people. For more information, visit GSA.gov and follow us at [@USGSA](https://twitter.com/USGSA).

Appendix F

Social Media Advertisements

Chicago, IL

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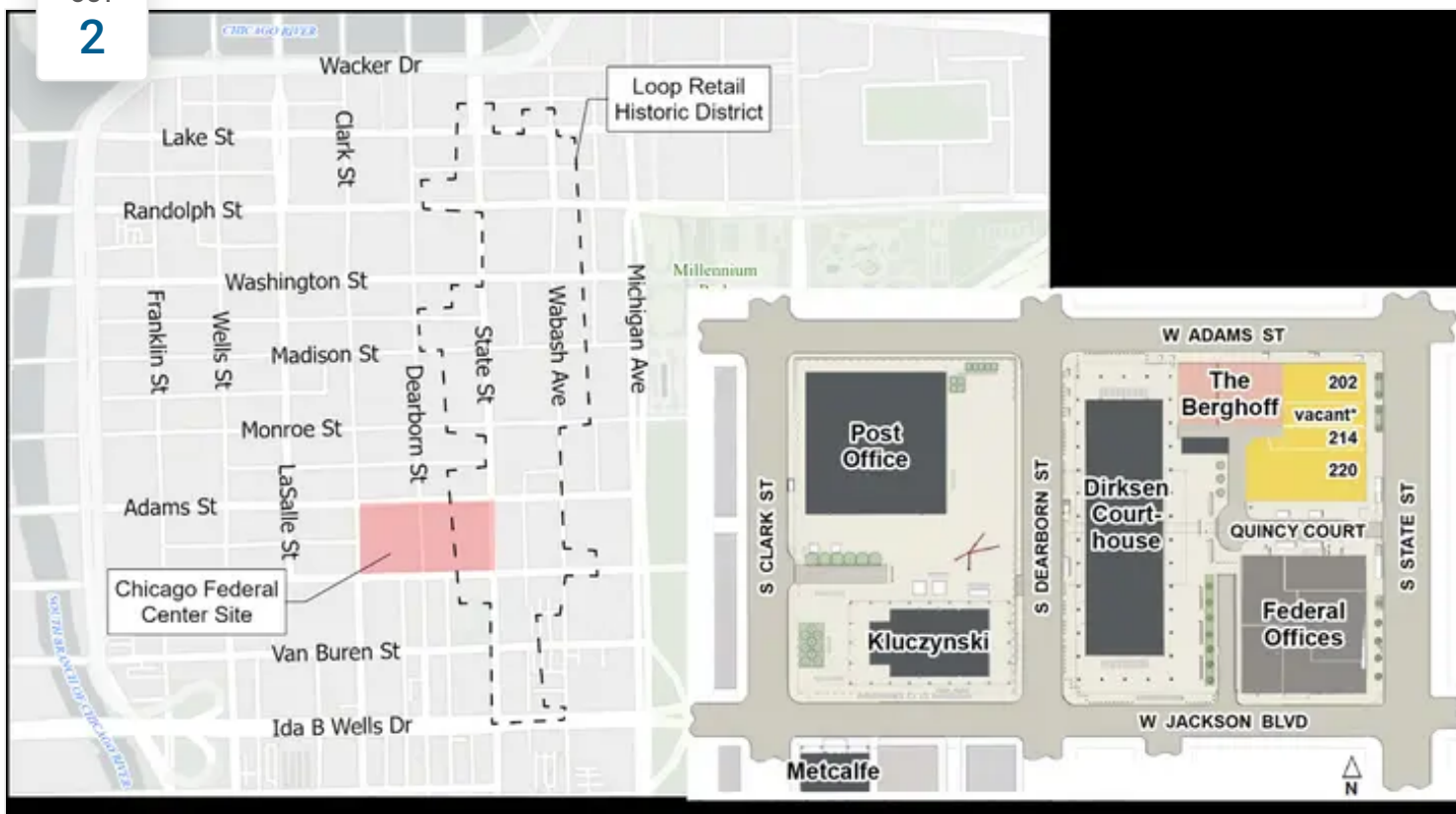
This post was contributed by a community member. The views expressed here are the author's own.

Chicago | Local Event

Public Hearing for Draft Environmental Impact Statement for 202, 214, and 220 S. State Street

Carla Mykytiuk, Neighbor

OCT
2



Event Details

Edit

Mon, Oct 2, 2023 at 3:00 PM

Add to calendar

Ralph H. Metcalfe Federal Building, 77 W Jackson Blvd, Chicago, IL, 60604

[More info here](#)

ADVERTISEMENT

The U.S. General Services Administration (GSA) invites you to attend a public hearing for a Draft Environmental Impact Statement (EIS) for the buildings at 202, 214, and 220 South State Street, Chicago, Illinois.

Monday, October 2, 2023

3:00 PM to 5:00 PM CDT

Metcalfe Federal Building's Morrison Conference Center

77 West Jackson Boulevard in Chicago

ADVANCE REGISTRATION IS REQUIRED TO ATTEND EITHER IN-PERSON OR VIRTUALLY

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Sunday at 3 PM – 5 PM
 **FreeN' Fun BarBingo @ Buona (Glendale Heights)**
 Jenn

Friday, September 29, 2023 at 8:30 PM
 **Planet Groove at Two Brothers Roundhouse in Aurora**
 Jim and Liz

Monday, October 2, 2023 at 3 PM – 5 PM
 **Public Hearing for Buildings at 202, 214 & 220 South State St.,...**

Recommended Events [See all](#)

Today at 5 PM – 7:30 PM
 **Cosley Zoo Uncorked Wine Tasting**
 Michelle and Melanie

Saturday at 7 PM – 10:30 PM
 **Mike and Joe at The Hideaway Brew Garden (Hoffman Estates)**
 Jim and 3 friends

Public Hearing

10.2.23, CHICAGO




MONDAY, OCTOBER 2, 2023 AT 3 PM – 5 PM

Public Hearing for Buildings at 202, 214 & 220 South State St.,...

77 W Jackson Blvd, Chicago, IL 60604-3614, United States

Details

-  Event by **U.S. General Services Administration Great Lakes Region**
-  **77 W Jackson Blvd, Chicago, IL 60604-3614, United States**
-  Duration: 2 hr
-  Public · Anyone on or off Facebook

The U.S. General Services Administration (GSA) invites you to attend a public hearing in support of an Environmental Impact Statement (EIS) to address the future of the buildings a... [See more](#)

[Social issues](#) [Chicago](#)





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41.877990, -87.630440

Meet Your Host



U.S. General Services Administration Great Lakes R...

6 past events · Page · Government organization

The Great Lakes Region supports federal agencies in Illinois, Indiana, Michigan, Minnesota, Ohio, an

Message

Related Events

THIS SATURDAY AT 7:30 PM

Maggie Speaks at Taste of Lockport

Lockport Illinois

Jim is interested

Interested



Appendix G

Public Hearing Boards

Welcome

to the Public Hearing for the Buildings at
202, 214, and 220 South State Street



Please Sign In

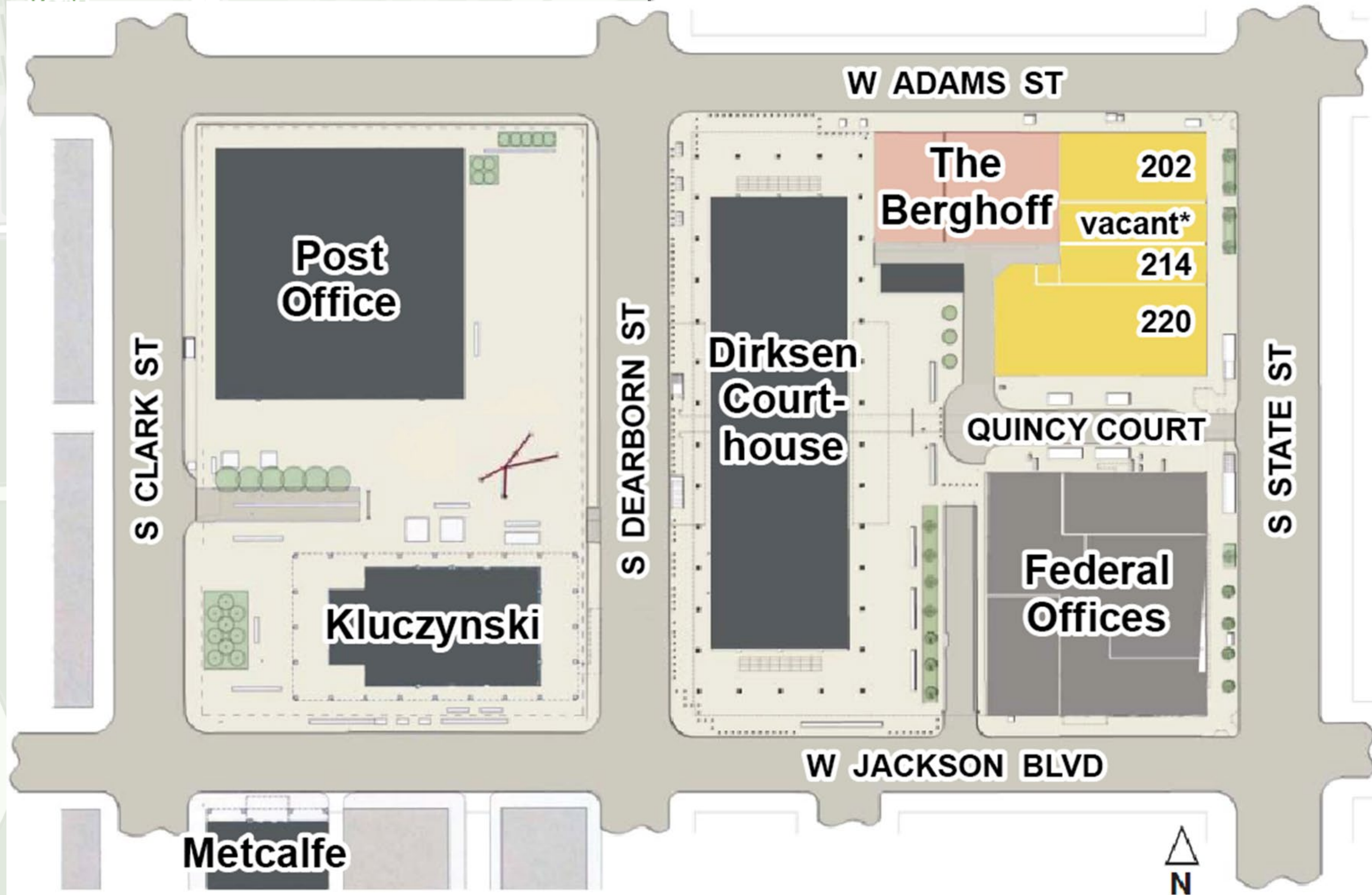
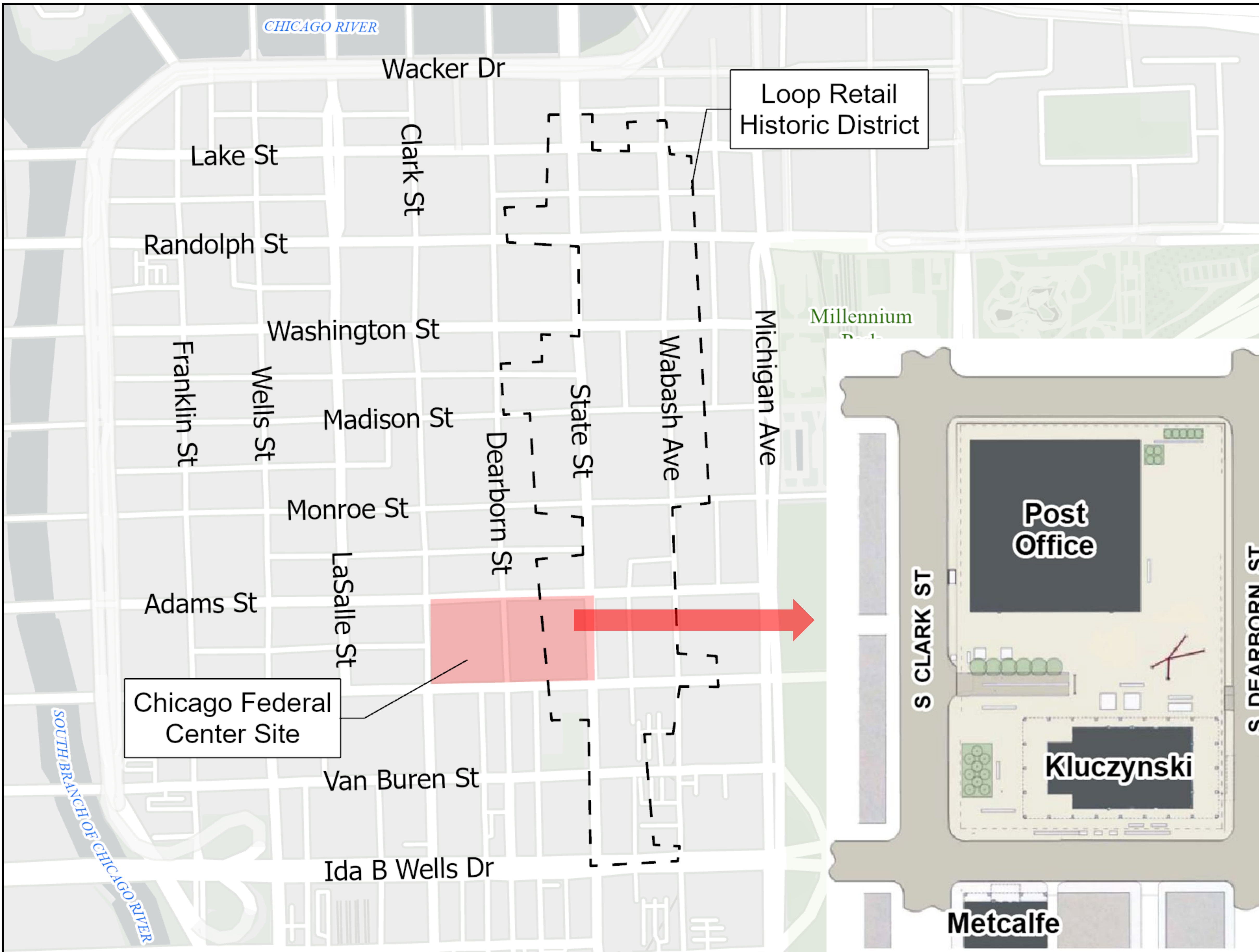
The purpose of today's meeting is to obtain public input on the Draft Environmental Impact Statement which GSA has prepared in compliance with the National Environmental Policy Act.

Hearing Agenda:



202, 214, and 220 South State Street

Site Location



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

202, 214, and 220 South State Street

Area of Potential Effect

Historic and Cultural Resources



202-220 South State Street

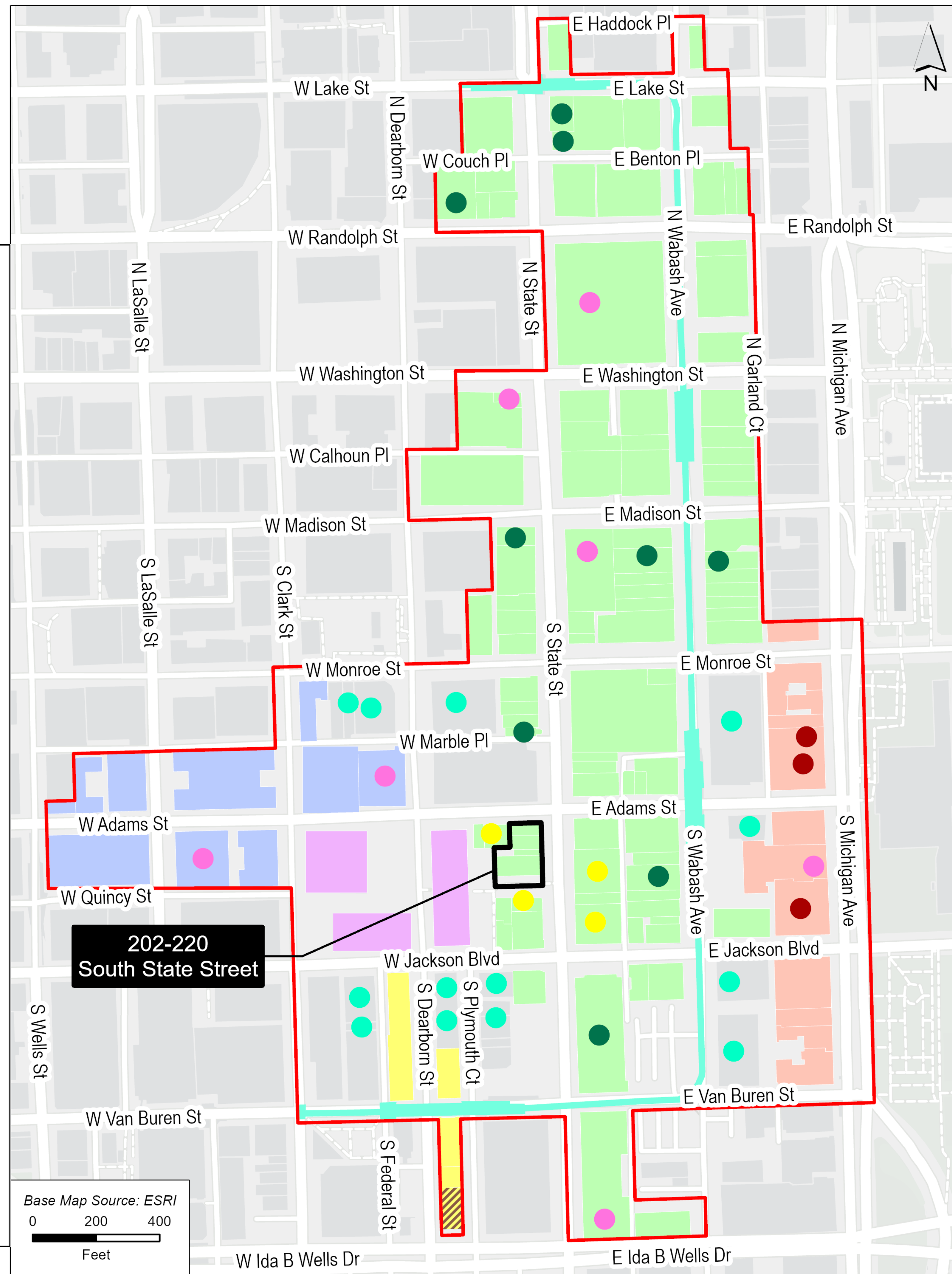
Area of Potential Effects

Historic Districts

- Loop Retail Historic District
- Chicago Federal Center
- Historic Michigan Boulevard District
- West Loop-LaSalle Street Historic District
- South Dearborn Street - Printing House Row North National Historic Landmark District
- South Loop Printing House District
- South Dearborn Street - Printing House Row North National Historic Landmark District/South Loop Printing House District

Building Category

- Adjacent Historic Building
- Individual Historic Property (Outside Historic District)
- Individually Listed Property (within Loop Retail Historic District)
- Individually Listed Property (within Michigan Boulevard Historic District)
- National Historic Landmark
- Chicago Union Loop Elevated Structure (The "L")



202, 214, and 220 South State Street

Guidelines for Commenting



- All project-related comments are welcome
- All comments are given the same consideration regardless of how they are submitted
- Comments must be submitted by **Tuesday, October 31, 2023:**
 - Use the electronic comment form which can be accessed via QR code or this link: <https://tinyurl.com/GSADEISComment>
 - Email to: StateStreet@gsa.gov
 - Mail to: Joseph Mulligan, General Services Administration, 230 S. Dearborn Street, Suite 3600, Chicago, Illinois 60604
- **Please note that all comments will be made public.**

How to submit comments during this meeting:

- ✓ In writing by submitting a comment form in the comment box
- ✓ Verbally with the stenographer (during the formal comment portion of the meeting or individually in Room 325)
- ✓ Via the electronic comment form which can be accessed via QR code or this link: <https://tinyurl.com/GSADEISComment>

Scan to
Comment



202, 214, and 220 South State Street

Impacts Summary Table

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. Impacts to aesthetic and visual resources at the project site and within the surrounding area, regarding scale, form, and materials, would be negative, minor-to-moderate, and long term.	Under this alternative, no long-term impacts 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.
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, minor-to-moderate, long-term impacts to land use.	Land use would not change under the No Action Alternative. Thus, there would be no impact.
Community Facilities	Potential disruptions to transportation and impacts from noise would result in negative, minor-to-moderate, short-term impacts.	No community facilities would be directly impacted; therefore, impacts would be negligible and short term.	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 no impacts to heritage tourism or environmental justice.	There would be no impacts to socioeconomics, heritage tourism, or environmental justice.
Greenhouse Gases, Climate Change, and Embodied Carbon	Greenhouse gas emissions would occur from removing the buildings. No long-term greenhouse gas emissions would occur after demolition. The impact would be minor to moderate and short term.	Greenhouse gas emissions would occur from the viable adaptive reuse of the buildings. The impact would be minor to moderate in the short term and negligible in the long term.	There would be no new impacts from climate change.
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, long-term impacts to local landfills.	Impacts would be beneficial, minor, and long term as a result of the removal of existing hazardous materials from the project site. Demolition debris would result in negative, minor, long-term impacts to local 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 negligible 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 negligible for regional air quality.	The No Action Alternative would not change current conditions. Therefore, no impacts to air quality would occur.
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 and the protection of children would be negligible during construction.	There would be moderate, long-term impacts to health and safety and the 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.

Mitigation Measures

Tools that GSA would implement to avoid or minimize potential impacts to resources



Resource Area	Summary of Potential Mitigation Measures
Cultural Resources	Mitigation measures will be stipulated in a legally binding Section 106 agreement document and included in the Record of Decision. 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 lot would be an open space with landscaping in compliance with GSA and U.S. Court design guidelines.
Land Use and Zoning	Under the Demolition Alternative , GSA would coordinate with City of Chicago 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.
Climate Change and Greenhouse Gases	No mitigation measures are required. GSA will consider several measures to reduce greenhouse gas emissions.
Hazardous Materials and Solid Waste	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.

202, 214, and 220 South State Street

Review the Draft Environmental Impact Statement HERE



202, 214, and 220 South State Street

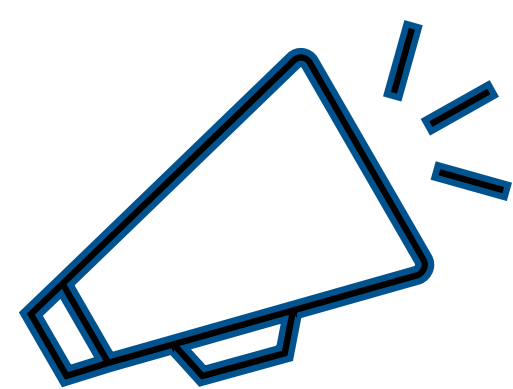
Participation Instructions

- Verbal remarks will be limited to 3 minutes.
- Speakers will be called in the order in which they signed up, either through online registration or with the sign-in sheet at today's meeting.
- At the beginning of your comment, please state your name and if applicable, your agency and title.
- The Panel will not respond to comments during the meeting.
- If there is time remaining after registered speakers have spoken, additional opportunities to speak will be given.
- If time does not allow for your verbal comment, please provide a written comment. If you prefer, an additional stenographer is available down the hallway in Room 325.
- GSA will consider public input received during the Draft EIS review period in their preparation of the Final EIS. All comments received will be part of the public record.

Stenographer



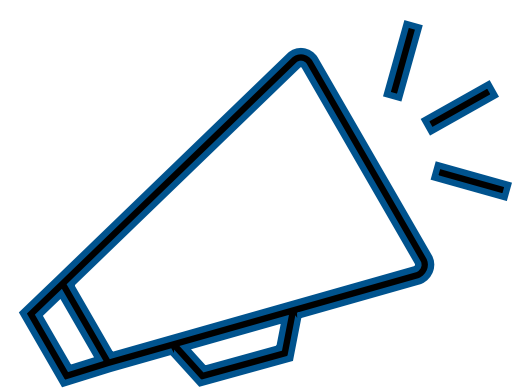
Room 325



If you have not signed up to speak at the meeting, verbal comments can be made to the stenographer.

202, 214, and 220 South State Street

Comment Table



Please put your comment form in the box or hand to a project team member.

202, 214, and 220 South State Street

Appendix H

Comment Form



Appendix I

Draft EIS Comments

1 **Comments Received on the Draft EIS**

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SCOPING MEETING FOR 202-220 SOUTH STATE STREET
U.S. GENERAL SERVICES ADMINISTRATION
COMMENTS FROM THE PUBLIC

Report of public comments given at the Public
Hearing for the U.S. General Services Administration
held at Metcalfe Federal Building, 77 West Jackson
Boulevard, Chicago, Illinois on the 2nd day of
October, A.D., 2023, commencing at the hour of
3:00 p.m.

PANEL PRESENT:

- MR. JOSEPH MULLIGAN,
GSA Project Manager
- MS. REGINA NALLY,
GSA Great Lakes Regional Historic Preservation Officer
- MR. MICHAEL GONCZAR,
GSA Great Lakes Regional NEPA Program Manager
- MR. CHARLIE WEBB,
Jacobs Project Manager

1 MS. MYKYTIUK: Hello, I did just want to point
2 out some of our housekeeping.

3 I believe you probably all heard that this
4 meeting is being recorded, in addition to that, having a
5 recording for our people who are in the hybrid meeting
6 on Zoom. We do have a court reporter taking a
7 transcript of the meeting, just to let you know.

8 The meeting presentation should start in just a
9 few moments at 3:10. We did want to let you know that
10 the comment form and a link to the notice of
11 availability will be provided in the chat. Participants
12 will and should be muted during the meeting, and that,
13 of course, goes for the people online.

14 If you've requested to participate in the formal
15 comment period, you will be asked to unmute and provide
16 your comment when your name is called, and, again, for
17 people in the room, we will call you in the order that
18 you have signed up to comment. Comments left in the
19 zoom meeting chat, and this is very important, are not
20 part of the formal public record.

21 You should use one of the other mechanisms to
22 submit a comment, and we will be providing that
23 information in the presentation, and if you look back on
24 your Eventbrite registration confirmation, that

1 information is also there in those emails.

2 Just a reminder, that you may submit comments by
3 email or regular mail until October 31st, 2023. Thanks
4 for participating.

5 MR. WEBB: Good afternoon, and thank you for
6 coming. We'll begin with introductions and then we'll
7 go through an agenda. Then we will start a short
8 presentation before we get to public comments. So,
9 Joseph Mulligan, GSA's project manager is here; Regina
10 Nally, the regional historic preservation officer; and
11 Michael Gonczar, the regional NEPA program manager are
12 here.

13 My name is Charlie Webb. I'm with Jacobs. I'm
14 the project manager for the consulting team that GSA has
15 brought on to assist them with complying with the
16 National Environmental Policy Act and the National
17 Historic Preservation Act.

18 So the purpose of the meeting tonight is to
19 receive public and agency comments on the draft
20 environmental impact statement that the general services
21 administration has prepared in accordance with the
22 National Environmental Policy Act.

23 Our agenda for the meeting, Joe and Regina and I
24 will go through the first four parts of the agenda, then

1 we'll have remarks from Commissioner Dizon and Chief
2 Judge Pallmeyer and then we will get to public comments,
3 which is the main part of this afternoon's agenda.

4 A couple of items for those of you who are from
5 the media are here tonight, Tanya Schusler, the GSA's
6 public information person couldn't make it. Her contact
7 information is out at the sign in table if you did not
8 already get that.

9 One other thing, all of the public comments
10 received tonight will be responded to, but not tonight.
11 GSA wants to reserve the bulk of the time, as much time
12 as possible, to receive public input, all of the
13 comments will be responded to, but GSA will not be
14 responding to comments at this afternoon's meeting.

15 Joe.

16 MR. MULLIGAN: So good afternoon.

17 Many of you joined us almost a year ago for our
18 public scoping meeting in November. So this information
19 is a review. Why we're all here today is for the
20 proposed action of the future of the properties located
21 at 202, 214, and 220 South State Street.

22 The purpose of our proposed action is to address
23 security concerns from the adjacent courthouse, the
24 Dirksen U.S. Courthouse, to respond to a federal

1 appropriation of the 2022 consolidated appropriations
2 act, which provides funding authorities to general
3 services administration to demolish the said properties
4 and, three, managing our federal assets, recognizing
5 that GSA does not have a federal use for the properties.
6 In accordance to that process, we have two statutory
7 requirements to fulfill, one is NEPA, the National
8 Environmental Policy Act, and two is the National
9 Historic Preservation Act. Both are being run
10 concurrently.

11 We initiated both of those in our scoping
12 meeting last November. The purpose of tonight, or
13 today, is to get public input on our draft environmental
14 impact statement. With that, we're also opening that to
15 anything under section 106 NHPA, to get general public
16 input on that as well. Your recommendations and
17 comments will be taken and responded to in what's called
18 a summary document, which is provided after the comment
19 period ends on October 31st.

20 An overview at the bottom of the slide that
21 you're looking at, it shows when we initiated our
22 process, last November, so it's almost a year later and
23 you can see we're midway through in preparing the
24 drafted environmental impact statement, and now in our

1 public comment review period. Again, that concludes on
2 October 31st.

3 From there, we would prepare a final
4 environmental impact statement. Before we do that,
5 we're looking to align several other deliverables, like
6 the 106, programmatic agreement, and other pieces of
7 analysis that would complement our effort to -- for our
8 decision-maker to make an informed decision on the
9 future of the properties.

10 That final EIS is also open in the public
11 comment period. There's no hearing, but you will be
12 allowed to provide input to GSA when we issue that
13 document as well. And we anticipate in doing that in
14 early 2024, and currently are projecting a record
15 decision in spring of 2024.

16 So Regina Nally is our regional historic
17 preservation officer and she'll speak regarding the
18 status of that undertaking.

19 MS. NALLY: Thanks, Joe.

20 We just wanted to provide you a quick overview
21 of the four steps, the section 106 process. The first
22 step is to initiate consultation, which we started with
23 the opening of our public scoping meeting back in
24 November of '23, as Joe said earlier. We did that and

1 simultaneously started with NEPA, and we -- we sought
2 consulting parties to participate.

3 Step number two, which were in the final steps
4 of close out for step number two in identifying historic
5 properties. In early '23 we convened the consulting
6 parties and we, since then, had seven meetings with
7 those consulting parties. Our reports from those
8 meetings are currently out for review by the State
9 Historic Preservation Office, the advisory council, and
10 the consulting parties.

11 We have initiated assessing effects for the
12 historic properties. I think we started those
13 conversations around about May with the consulting
14 parties to identify affects to historic properties which
15 include the subject properties, historic districts, and
16 other historic properties in the vicinity. We are
17 documenting those effects as we speak.

18 Our next step would be step number four, which
19 would be to resolve adverse effects. The purpose of
20 this step is to eventually create a programmatic
21 agreement that guides GSA in the direction on how to
22 avoid, minimize, or mitigate adverse effects to historic
23 properties. The agreement would be at a minimum among
24 GSA, the State Historic Preservation Office, the

1 Advisory Council Historic Preservation and any other
2 organizations that have responsibility to execute
3 anything.

4 Currently, we anticipate concluding the
5 agreement document in early 2024, with the intent of
6 moving towards our record of decision in spring of 2024,
7 as Joe had mentioned.

8 That's an overview of that.

9 MR. WEBB: Thank you.

10 So we have an overview of the impacts as
11 documented in the draft and environmental impact
12 statement. There's two copies of this document in the
13 back of the room. It is, of course, online, so you can
14 take a look at it there. There is a paper copy just
15 down the street at the Harold Washington Library
16 reference section, too, if you're not able to get to it
17 online.

18 So a couple of the things, the draft
19 environmental impact statement does not say which
20 alternative is better. It does not indicate a preferred
21 alternative on behalf of GSA. The final environmental
22 statement that Joe mentioned that will identify GSA's
23 preferred alternative, but the draft EIS does not.

24 I'm going to pause for a second because we lost

1 Wi-Fi momentarily.

2 Okay. And we're back.

3 For of those of you who lost the connection
4 online, we paused the meeting so you didn't miss
5 anything.

6 So the draft EIS evaluates a whole range of
7 resources, and you can see the list in the blue banner
8 on the right side of this slide. And for each of those
9 resources, the draft EIS identifies four things, it
10 identifies the intensity of the impact, whether it's
11 significant or moderate or minor or there is no impact
12 to that resource.

13 It assesses the geographical context of that
14 impact, is it just a footprint of these three buildings
15 that would be affected or is it the Loop or is it Cook
16 County? It gives a -- the quality of the impact, is it
17 a negative impact or is it a beneficial impact?

18 And lastly, it discusses the duration of the
19 impact, is it a short-term impact that would be only be
20 experienced during adaptive reuse or during demolition
21 or is a long-term impact that would be experienced after
22 either of those two alternatives is implemented?

23 So on this slide it lists, under alternative A
24 in the left column, those resources that would have a

1 significant or moderate the impact, so for the
2 demolition alternative, there would be a significant
3 impact to cultural resources and to land use, a moderate
4 impact to the Loop Retail Historic District and the
5 Chicago Federal Center, and I should back up a second,
6 of course a significant cultural resources impact would
7 be to 202, 214, and 220 South State Street.

8 For the purpose of this undertaking, the
9 building at 214 South State Street is being treated as
10 eligible for the National Register as a contributing
11 element to the Loop Retail District.

12 And, lastly, under the demolition alternative
13 being moderate noise impact, short-term during
14 implementation of that alternative, you can see
15 alternative B, and the no action alternative, we list
16 those -- there are no significant impacts identified in
17 the draft environment impact statement under the
18 adaptive reuse alternative, but there would be moderate
19 short-term to the surrounding community, in terms of
20 noise during renovations and the no action alternative
21 could have a moderate long-term impact to these cultural
22 resources as these buildings would remain in their
23 current condition and need of repair.

24 Joe?

1 MR. MULLIGAN: So for next steps, as I stated
2 earlier, we are now in the public review of the draft
3 EIS. This forum is one of those opportunities for the
4 public to provide comment. We'll go through other means
5 on how you can provide comment as well, and, again, we
6 stated previously, but just to show the timeline for the
7 NEPA effort, the final EIS in early 2024, with a record
8 decision in spring 2024.

9 So ways you can provide public comment -- we
10 look forward to receiving comment today from everyone in
11 attendance. However, you can reserve comments and still
12 provide them through this month, October 31st being the
13 deadline. We have, via email, our statestreet@gsa.gov,
14 as well as you can send them in mail to my attention.

15 Again, all comments are considered, documented
16 in our summary report, and then considered in the final
17 environmental impact statement. So there is value,
18 there is a way for the public to engage in this effort,
19 and then for us to properly respond.

20 With that, I'd like to introduce two speakers
21 today who will give brief remarks. The first being our
22 regional commissioner, Angel Dizon, so I'd like to
23 introduce him.

24 MR. DIZON: Thanks, Joe.

1 Good afternoon everybody, can I do a quick poll
2 to find out how many of you all were here in November?
3 Okay. I can tell. This is twice as many people as we
4 had in November. And so for those of you that came
5 back, thank you so much for coming back and for all the
6 new folks, welcome to this opportunity to provide your
7 comments.

8 I'm going to keep my remarks pretty short. Not
9 because I don't care, but Joe's really the smart one
10 here. I do want to tell you up front, that there has
11 been no decision made about the disposition of these
12 buildings and I know that that's a concern out there, so
13 I just want to make sure I put that out there right away
14 that we are going through this process to determine what
15 might be the best solution to all of this.

16 And I'll tell you that, us working collectively
17 is much better than anyone of us working in isolation,
18 so we're smarter as a collective, which is the good
19 thing, and based on some of the public comments that I
20 have read about GSA, no one thinks we're all that bright
21 to begin with, so having your input is really helpful.

22 And what I think I'll just close with is that, I
23 think what Joe's already stated, is that I think there's
24 going to be plenty of opportunities for folks to provide

1 their input, and my hope is that the way that we work as
2 a collective, that we can find ways to satisfy the real
3 security issues that the courts have and provide
4 opportunities to preserve the buildings. So I think
5 that's what our collective goal is and I think that
6 opportunity does exist.

7 So, anyways, that's enough from me, but I'll
8 turn it over to Chief Judge Pallmeyer.

9 JUDGE PALLMEYER: Thank you, Angel.

10 And thank you to Joe Mulligan and all of those
11 of you within GSA that have been leading this process.

12 I want to thank the consulting parties for their
13 collaboration and their commitment to exploring truly
14 viable reuse alternatives first, and also, of course,
15 the public, for your own expressed interest in the
16 outcome of this process and these properties. I am
17 Rebecca Pallmeyer, I'm the chief judge of the court, the
18 United States District Court for the Northern District
19 of Illinois.

20 As you may know already, I serve also as chair
21 of the Dirksen Courthouse Building Safety and Security
22 Committee. My role and priority in that role -- in that
23 responsibility is to ensure the safety and security of
24 the federal courthouse and to protect thousands of

1 people who visit the courthouse every day, more than 70
2 judges, 1500 public servants, hundreds of jurors,
3 hundreds of citizenship candidates and their families,
4 including small children, groups of schoolchildren on
5 field trips from their civic responsibilities, and
6 thousands of members of the public who need to access
7 services at our court or other federal offices in the
8 building.

9 Just as a reminder, the security threats to the
10 Dirksen Courthouse are not just matters of theory or
11 speculation, in 2004 Gale Nettles was indicted and
12 ultimately convicted for plotting to destroy our
13 courthouse with a truck bomb of ammonium nitrate.
14 Partly in response to this episode in 2005, congress
15 authorized the purchase of the properties that are
16 surrounding the courthouse for the specific purpose of
17 creating a security buffer zone for our building.

18 The exception was that we would ultimately use
19 those properties for federal purposes. But as years
20 have passed, the need for federal office space has
21 declined and, indeed, public and private office space is
22 vacant throughout the Chicago downtown area.

23 There's currently no need for federal office
24 space and the federal courts are under, what they call a

1 no net new mandate, which prohibits the expansion of the
2 Court's footprint. In short, our need for space has
3 diminished, but our need for security has not.

4 Disrupted activity and threats to the Court's security
5 and safety continue.

6 In recent years, the United States Marshals
7 Service, the FBI, the ATF, the Federal Protective
8 Service, the Administrative Office of the United States
9 Courts, and private sector security experts have
10 conducted an analysis of our courthouses security
11 vulnerabilities.

12 As a result of those lessons learned from that
13 analysis and the review, we developed a list of 15
14 criteria for the adaptive reuse of the state's three
15 properties. Those criteria points outline what law
16 enforcement professionals have concluded is required to
17 protect the Dirksen Courthouse and its functions, and
18 the adaptive reuse would have to meet those criteria.
19 Our motivation is not demolition for the sake of lake
20 views or convenience.

21 Our concern really is for the safety of the
22 employees, visitors, and community. We are hopeful that
23 this section 106 process and the ideas that result from
24 collaboration here will result in a resolution that does

1 protect the security and safety of the courthouse public
2 and reclaims the dignity of the courthouse surroundings
3 for the benefit and the enjoyment of the public.

4 Thank you.

5 MR. WEBB: So we can now begin public comments.
6 Let me grab my list of -- my list of those signed up to
7 speak. We'll go through them in order as people signed
8 up, it will be a mix of people who are here in the room
9 tonight and people who are online. For those -- I
10 will -- I will give you notice of the next two or three
11 people scheduled to talk so you can be ready. For those
12 of you online, Carla will unmute you when we are ready
13 to receive your testimony.

14 Just to reiterate, what we have the sign-ups in
15 the back of the room, so in addition to the court
16 reporter we have here recording everything in this room,
17 if you'd like to give verbal comments tonight but you'd
18 prefer not to come up to the microphone, we have a
19 second court reporter who's across the hall, if you go
20 out the door, over your back left shoulder and kind of
21 do a 180, there's a stenographer, Sharon, in there who
22 will record your testimony. You can go in there at any
23 time, you do not need to sign up. That testimony there
24 counts just as much as the testimony given in the room

1 tonight or online or in a comment form tonight or in an
2 email to Joe any time before October 31st. So with
3 that, Carla, are we ready to begin?

4 MS. MYKYTIUK: Yes.

5 MR. WEBB: A couple of logistical things we'll
6 take care of. So while Carla is doing that, let me give
7 the names of the first three people who will speak.
8 Jacob Klippenstein will speak first, followed by
9 Christopher Cody, followed by Anne Morse.

10 So Jacob is in person. If Jacob is here, you're
11 free to begin your remarks. I don't see Jacob here. So
12 we're going to go to Christopher Cody, who I believe is
13 online; is that right, Carla?

14 MS. MYKYTIUK: Yes.

15 MR. WEBB: Okay, Christopher, who's online,
16 we're ready for your testimony and then Anne Morse will
17 follow Christopher.

18 MR. CODY: Hi. This is Christopher Cody. I'd
19 like to concede my time to the next speaker. Thank you.

20 MR. WEBB: Okay. Thank you, Christopher. So,
21 Anne, we'll go to you, and then Kendra Parzen will
22 follow Anne.

23 MS. MORSE: Hello, everyone. Thank you so much
24 for giving us this opportunity.

1 As a 35-year-resident of Chicago, I've seen a
2 lot of changes on State Street, up and down State
3 Street, there's been a lot of very interesting ideas
4 proposed, some of them executed.

5 Unfortunately, the vacancy rate and the decline
6 of State Street has a tendency to depress creative reuse
7 and adaptive reuse of that space. Voids on the
8 streetscape are a contributing factor to that decline.
9 So demolition has a very feel effect on the culture of
10 Chicago of the way we live in the city.

11 One of the things I'm inclined to point out is
12 that there are some things that didn't get mentioned in
13 the impact statement and one of those is that when you
14 take down those buildings, you're putting them in
15 landfill, you're not just leaving a hole in the mouth of
16 State Street, but also distributing that waste material
17 elsewhere.

18 And in the event that at some point something is
19 built, we're using extractive purposes to create the
20 materials, to build new buildings, which, unfortunately,
21 in our experience, have a tendency to then turn into
22 landfill themselves in a much shorter period of time
23 than 19th century buildings, which were essentially
24 built to last.

1 So I'm hoping all of that kind of thing will be
2 taken into consideration, that people will have an
3 opportunity to build on the creative or adaptive reuse
4 that have been suggested and to come up with a
5 meaningful change.

6 Another situation that I haven't heard discussed
7 is whether or not, it seems as though it's being
8 presented as an all or nothing situation where all three
9 properties will have to be demolished. Perhaps one of
10 them can be saved. Perhaps one of them can anchor that
11 streetscape, which is a very important corner in
12 Chicago.

13 Thank you very much for your time. I appreciate
14 that.

15 MR. WEBB: Thank you.

16 So go to Kendra, and then Kandalyn Hahn after
17 Kendra. I think Kendra is here. Go ahead, Kendra.
18 Thank you.

19 MS. PARZEN: Thank you.

20 Good afternoon. My name is Kendra Parzen. I'm
21 the advocacy manager for Landmarks Illinois. We are the
22 statewide nonprofit organization advocating for historic
23 Preservation.

24 In both 2022 and 2023, we included these

1 buildings on our annual list of the most endangered
2 historic places in Illinois, and we appreciate this
3 opportunity to comment on the draft EIS.

4 So I have to say, I think we were pleasantly
5 surprised by the draft's findings regarding the Impacts
6 of alternative A demolition; and alternative B, adaptive
7 reuse. We strongly agree with the characterization that
8 demolishing these buildings would have impacts that are
9 negative, significant, and long-term, and we also agree
10 that adaptive reuse would have impacts that are
11 beneficial and long-term.

12 So, if these findings, frankly, pose the
13 question, how can the demolition of these buildings
14 remain on the table when adaptive reuse is clearly the
15 superior alternative from an environmental perspective?

16 Nevertheless, since demolition is still very
17 much on the table, we also feel compelled to comment on
18 the mitigation proposed in this draft report, which is
19 to landscape the cleared lots as green space, although
20 there are certainly examples of flat green spaces and
21 plazas in the greater Loop area. With the exception of
22 Pritzker Park, these examples are not located along
23 State Street, one of our city's densest corridors.

24 Open space with landscaping is not consistent

1 with the visual character of State Street nor with land
2 use plans for this area of the city. The aesthetic and
3 visual effects of this change would not be minor to
4 moderate but severe, and would be extremely poor
5 compensation for the loss of these significant historic
6 buildings.

7 Thank you for considering our comments. I
8 anticipate submitting additional comments in writing, so
9 I yield the remainder of my time.

10 Thank you.

11 MR. WEBB: Thank you, Kandalyn.

12 MS. MYKYTIUK: Kendra. Kandalyn has not spoken
13 yet.

14 MR. WEBB: Sorry. I didn't have my reading
15 glasses on. I can't read.

16 Okay. So Kandalyn is on -- signed up to speak
17 online, but we do not see her on the list of online
18 participants Carla tells me.

19 So, Kandalyn, if you're online and we're not
20 seeing you, now is your time to speak. But we can look
21 back to her if she does come online.

22 So the next person to speak will Brian Hodapp,
23 followed by Shawn Ursini. So Brian is online, I
24 believe. So, Brian, if you can hear me, go ahead.

1 We're ready for your testimony.

2 Oh, he just dropped off. Okay. So until Brian
3 comes back on, Sean, who is in person. Sean, go ahead.

4 MR. URSINI: Thank you. Shawn Ursini.

5 I work with the Council on Tall Buildings and
6 Urban Habitat, but my statement will be of my own
7 opinion.

8 And I'm just going to start with a statement I
9 found on the GSA's website, the GSA's goal are to help
10 its customers reach their sustainability goals, reduce
11 environmental impact to the federal government, and to
12 make the -- make the working environment more
13 sustainable and environmentally friendly.

14 So I just want to pose the question, how does
15 demolition further these goals, because it actually runs
16 counter to them? Even if, hypothetically, these
17 buildings were entirely recycled with their demolition
18 debris under scenario A, which that's not even possible,
19 but even if, hypothetically, it was, it completely
20 ignores the embodied carbon that exists within these
21 buildings today and I felt that that was lacking in the
22 draft EIS because it's not really fully considering the
23 environmental impact holistically if these buildings
24 were to be removed.

1 And while I'm encouraged by the draft EIS making
2 a mention of potentially retaining these buildings, it
3 does appear that decision has already made it toward
4 demolition, in no small part because the appropriation
5 language for the congressional funding with regard to
6 these buildings does specify demolition.

7 So even if we had a favorable outcome for
8 retaining these buildings ultimately out of this process
9 the legislation would need to be amended, and there
10 would be an additional hurdle to be making that happen.
11 I hope that does not impact the final decision that's
12 yet to be made.

13 And the EIS does mention the obvious impact to
14 Cultural resources by demolition of these existing
15 buildings. However, it doesn't consider the broader
16 impact that it's going to have on State Street overall,
17 which has an extraordinarily distressed commercial
18 retail market right now. And if you destroy part of the
19 streetscape, that streetscape is going to look more like
20 a mouth with broken teeth, rather than a holistic whole
21 that's contributing to Chicago's historic resources of
22 this being a birthplace of the skyscraper.

23 And some of the preservation experts have
24 mentioned that if we were going to try to apply for

1 UNESCO World Heritage, this sort of erodes our standing
2 in even doing so. It's extremely important that we
3 retain some of these historic buildings because they
4 were some of the earliest skyscrapers.

5 And, you know, where does the security perimeter
6 end, like 209 South State Street is up for sale right
7 now as a potential redevelopment opportunity? Are we
8 going to say that no one can invest across the street,
9 too, because of security concerns?

10 I mean, I understand the concerns that the
11 federal government has on these properties, but there
12 are other new courthouses and renovated courthouses in
13 urban centers, like, Des Moines, Greenville, Nashville,
14 Toledo, Savannah, Harrisburg, Mobile, Alabama that the
15 GSA has just invested in.

16 But if we consider that Chicago's unique
17 environment because of the level of density we have,
18 maybe we should consider that a federal courthouse in a
19 major city center is not a compatible use, and maybe
20 consider relocating elsewhere in the city.

21 Thank you.

22 MR. WEBB: Okay. We're going to go back to
23 Brian.

24 Brian, we're ready for you.

1 MR. HODAPP: Can everyone hear me?

2 MR. WEBB: Yes. Go ahead, Brian.

3 MR. HODAPP: Okay. Yes -- you know, support for
4 the adaptive reuse --

5 MR. WEBB: Brian, you are cutting in and out.

6 MR. HODAPP: -- old century and consumers --

7 MR. WEBB: Brian, you are cutting in and out.

8 We're not able to pick up your comments, so I'm going to
9 suggest that we put Brian on mute again. We'll go back
10 to him, but let's continue down our list, Carla.

11 So the next person to speak --

12 Does that sound all right?

13 MS. MYKYTIUK: Yeah. It may be a problem with
14 the Wi-Fi in the room.

15 MR. WEBB: Okay. Well, let's go onto the next
16 speaker.

17 So the next person on our list is Anna Mizzi,
18 followed by Richard Prinz. Anna is online.

19 Anna, we're ready for your testimony.

20 MS. MIZZI: Hi, my name is Anna Mizzi, and I am
21 a fourth generation Chicago --

22 (Technical difficulties.)

23 -- as such, I love this city, and I hope that
24 the GSA uses this unique opportunity it currently has --

1 to -- they have beautiful buildings with --

2 (Technical difficulties.)

3 -- the use of materials and skills -- as a
4 federal employee, purchase --

5 (Technical dificulties.)

6 -- holder and -- I know the response -- the
7 government has to make fiscally sound use --

8 (Technical difficulties.)

9 -- and purchasing. By choosing to repurpose,
10 this could be seen as --

11 MS. MYKYTIUK: Anna, we are not hearing you
12 after you said "repurpose."

13 MS. MIZZI: -- the landfill waste produced can
14 dump the raw material -- lastly, there are interested
15 groups .

16 (Technical difficulties.)

17 -- the security was hired for the Dirksen
18 Building, which was the -- of the original purchase.
19 For the future use of the site, it is evident that the
20 presence of these buildings do not pose a risk on their
21 own as they have been standing for the last nearly two
22 decades. I am a resident of Printer's Row just a few
23 blocks away and has been my neighbor --

24 MS. MYKYTIUK: Anna, you are faded out again.

1 MR. WEBB: So a couple things for those of us
2 in the room: We identified the problem, and it's us.
3 It's the Wi-Fi here. It's not on behalf of the
4 speakers. So we're going attempt to get that squared
5 away.

6 We'll go back to Brian. We'll go back to Anna.
7 The next five or six speakers are all people who are
8 signed up to give testimony in person. So we'll do
9 that. But, also, Carla was getting a transcript on her
10 screen of Anna's entire statement. So it's going on the
11 record. But we're going to have to get our Wi-Fi in the
12 room squared away.

13 Anna and Brian, especially, after all of the
14 speakers who are online, email your comments, if you
15 would, to Joe Mulligan at the address that Joe gave a
16 moment ago and we'll have it on the screen before the
17 meeting ends. But let's go now to the people who are in
18 the room while we get the Wi-Fi situation squared away.
19 So we'll go to Richard next and then Mary Lu Seidel will
20 follow Richard.

21 So is Richard here? Richard was signed up to
22 give testimony in person. Not seeing Richard, so let's
23 go to Mary Lu. Is Mary Lu here?

24 MS SEIDEL: Yeah.

1 MR. WEBB: Okay. Thank you, Mary Lu, go ahead.
2 And then after Mary Lu is Victoria.

3 MS. SEIDEL: Thank you very much. My name is
4 Mary Lu Seidel. I'm the director of community
5 engagement at Preservation Chicago.

6 We've been involved in every community meeting,
7 consulting party meeting to date. We're encouraged by
8 this process of late, but we agree with -- I want to
9 concur with all of the comments Kendra Parzen from
10 Landmarks Illinois made a little while ago about the
11 process and our concerns about the future.

12 The impact statement also indicates that there's
13 no impact really of not doing anything, and we would
14 disagree very clearly that there is significant impact
15 of not doing anything on any of these buildings because
16 for the last 12 years that's what's happened to them.
17 It hasn't had a good positive impact.

18 So we think that really needs to be clearly
19 spelled out in the EIS that no action will be a
20 detrimental -- a significant detrimental impact. But I
21 just wanted to reiterate those points about the process,
22 making sure that we really need to lighten up on those
23 15 criteria, I think to the other gentleman's point
24 about if there are so many concerns being so close to

1 many high-rise buildings for the federal courthouse,
2 that maybe they should consider a different place for
3 that as well.

4 But we care about the concerns and the safety
5 for the judges. We care about all of the people who
6 work and visit those buildings, but we also think that
7 you can preserve -- you can address all of those issues
8 without destroying part of our city's history. Thank
9 you.

10 MR. WEBB: Thank you, Mary Lu.

11 So we'll go to Victoria and then Ward after
12 Victoria.

13 So the Wi-Fi is down. Should we go ahead with
14 the in-person comments?

15 Okay. So we'll continue with the -- is Victoria
16 here?

17 Okay, Victoria Kahle -- okay, you're signed up
18 to speak but you don't want to speak; is that right?

19 MS. KAHLE: I did not sign up.

20 MR. WEBB: Okay. You did not sign up to speak.
21 Okay. Very good.

22 So then, Ward, we'll go to you, and then after
23 Ward we'll go to Rolf.

24 Go ahead, Ward.

1 MR. MILLER: Thank you. For the record, Ward
2 Miller, executive director of Preservation Chicago.

3 We at Preservation Chicago want to continue to
4 encourage the General Services Administration, the
5 justices and the related parties to preserve, restore,
6 and reuse the Century and Consumers buildings located at
7 202 and 220 South State in the heart of the Chicago
8 Loop.

9 Century and Consumers Building were part of
10 Chicago's most endangered for the last two years and
11 actually once about a decade ago, and we were assured
12 during that time that they were in good hands and safe.
13 We at Preservation Chicago, along with the city of
14 Chicago and many in the architecture and preservation
15 world, are of the opinion that the 16-story Century
16 Building of 1915 by architects Holabird and Roche, along
17 with the 21-story Consumers Building by Jenney, Mundie &
18 Jensen, should also become designated Chicago landmarks.

19 As you know, these structures have been taken
20 into the City's landmarks process to be considered for
21 designation and thereby join other Chicago buildings on
22 the world stage where we would welcome them. The
23 proposed demolition will create a severe adverse effect,
24 not a moderate impact to The Loop and The Loop and

1 Retail National Register Historic District, the State
2 Street street wall, and will cause much undo and severe
3 harm to Chicago's architectural legacy.

4 It will also cause a hole in the city center,
5 much like Block 37 harmed this historic built
6 environment, and profoundly and adversely impacted this
7 incredible unique collection of terra cotta buildings
8 and skyscrapers on State Street and throughout The Loop
9 in downtown Chicago.

10 These two structures are essentially the
11 Reliance Building in waiting, referring to the building
12 at State and Washington, just three blocks to the north.
13 We saw an amazing transition there.

14 We also want to acknowledge the draft
15 environmental impact statement prepared for the
16 buildings at 202, 214, and 220 South State appear to be
17 flawed at best and contradictory. The document also
18 notes, among other items, that the GSA should reduce
19 their real estate footprint in accordance with their
20 statutory mission and in addition to a series of
21 presidential memorandums and implementation policies.

22 So that would imply that perhaps the Century and
23 Consumers Building could be offered for sale as an
24 option and still be in compliance with other

1 requirements pertaining to safety issues at the Chicago
2 Federal Center and the Dirksen Federal Courthouse. This
3 could also include possible state and municipal offices
4 as well.

5 A charrette was held last Thursday at the
6 Wizeski [phonetic] Building, became obvious that there
7 are other nearby federal properties outside the
8 boundaries of the Central Loop that could be sold at a
9 premium for private redevelopment.

10 This includes the 13-story Railroad Retirement
11 Board Building, also known as the Lipinski Building at
12 844 North Rush Street in the Gold Coast Community and
13 located about a mile from the federal center. This
14 structure is more than 90 percent leased to other
15 entities, including a Bentley Rolls-Royce and
16 Lamborghini showroom and only three floors of that
17 massive building are used for the Railroad Retirement
18 Board.

19 We also have a building in the West Loop built
20 in 1975 at 600 West Madison. The potential sale of
21 those premium properties on the Gold Coast and The West
22 Loop and the consolidation of offices into those
23 structures or into the Century and Consumers Building
24 could also very much support the renovation and

1 restoration of the Century and Consumers Buildings.

2 Therefore, many of our federal services could be
3 consolidated into the federal center complex. This is a
4 tremendous idea which can serve the needs of the GSA,
5 its agencies for years to come, while also satisfying
6 safety requirements and preserving the promise 17 years
7 ago to preserve these structures in these two prominent
8 Loop sites.

9 We have additional comments that we'd like to
10 submit in the written form that go outside the three
11 minute testimony conversation.

12 I also want to ask if we continue to have
13 terrible problems with half the people that are trying
14 to speak online, if their comments are in the written
15 form that those could be read by the speaker, just to
16 share with all of us in the audience, a more public
17 transparent process is what we're all looking for, and
18 we look forward to a positive impact here. We all want
19 to see these buildings preserved.

20 Thank you.

21 MR. WEBB: Thank you, Ward.

22 Yeah. If we can get written comments from those
23 who are online who have not yet been able to give their
24 testimony, we'll read those, but --

1 UNIDENTIFIED SPEAKER: And they are saying they
2 are able to hear each other online as well, so it's more
3 of a problem with the room, but Brian H. would like
4 another opportunity to speak.

5 MR. WEBB: All right. Do you think we're ready
6 for another --

7 UNIDENTIFIED SPEAKER: Yeah. I think so.

8 MR. WEBB: All right. We're just going to pause
9 for a minute to see if the Wi-Fi is working and then
10 we'll go back to Brian.

11 MR. HODAPP: Hi, Brian Hodapp. I'm a resident
12 of the city of Chicago for 15 years. I have a strong
13 interest in the architecture of Chicago, which I believe
14 makes it a very unique city, so that's why myself, along
15 with similar to majority of people in the public that
16 I've come across who are broadly in defense of
17 supporting and maintaining the Century and Consumers
18 Buildings, we believe that their historic character
19 contributes to The National Register of Historic Places
20 in The Loop Retail Historic District.

21 MR. WEBB: Brian, we lost you again, so we're
22 going to go back to the people in the room. And, yeah,
23 if we can, get written comments from those who are
24 online, we will read them here in the room.

1 Interestingly, Carla tells me that everybody online can
2 hear one another, it's just that we can't hear them. At
3 least that's what were we told. Okay. So let's go back
4 to those in the room.

5 So, Rolf, go ahead. And then Anna signed up to
6 present in person, but Anna was also signed up online,
7 and she started her comments online.

8 So, anyway, Rolf, go ahead.

9 Or excuse me. Could you pause for a second?
10 I'm just trying to get the Wi-Fi back before we turn the
11 floor over to you.

12 (Technical difficulties.)

13 MR. ACHILLES: -- other buildings including 131
14 South Dearborn and the Monadnock Building at 53 West
15 Jackson, so how can proximity to these buildings be
16 considered safe while others are not? Urban renewal is
17 widely agreed to have been a mistake with devastating
18 consequences that reinforced segregation, increased
19 dependency on the automobile, and wiped out entire
20 neighborhoods off the map. Let's not repeat these
21 mistakes.

22 If the Dirksen Courthouse is at risk, then I
23 hope that the GSA should have the expertise and
24 resources to mitigate that risk not by devastating the

1 neighborhood of The Loop but by reassessing the safety
2 of the courthouse and seeking a safe, private,
3 redevelopment plan for the Centuries and Consumers
4 Buildings.

5 This approach is completely feasible and it
6 would even be cost effective for the GSA. Spending 52
7 million just to destroy the buildings is not a good use
8 of federal resources. Those are my comments.

9 Thank you.

10 MR. WEBB: Thank you, Brian. Brian, if you're
11 able to submit your comments in either a document in the
12 chat or to email them to Carla, we'll read them because
13 we in the room could not hear them start to finish. We
14 will get them in the record one way or another.

15 Okay. Are we ready for Rolf?

16 So after Rolf, when we're back up and running,
17 then we'll go to John Borgman and then to Brian
18 Whitlock, who are both speaking in person tonight.

19 Okay. Rolf, go ahead whenever you're ready, and
20 then we'll go to John and then Brian.

21 MR. ACHILLES: Hi, Rolf Achilles, and thank you
22 for the opportunity to talk to you, even though the
23 floor hasn't turned over yet, it's still very stable in
24 here.

1 My comments are about the three buildings in
2 discussion because there's an aspect of those buildings
3 that we haven't really talked about at all, not just
4 preserving or destroying them, but the reason those
5 buildings are significant today is not just because
6 they're skyscrapers, but its they're terra-cotta.
7 They're in the middle range of Chicago's great
8 terra-cotta boom.

9 Chicago invents architectural terra-cotta in a
10 new way in the course of the 19th century and we have
11 numerous examples; and, first, in fact, we have the
12 first signed piece of the terra-cotta in the United
13 States. It's by Isaac Scott. It's at 1401 North
14 Dearborn Street, but these buildings are terra-cotta, a
15 whitish terra-cotta, which was innovative in an age of
16 soot and grime.

17 They're white terra-cotta, the Reliance Building
18 was just before them and The Wrigley Building is just
19 after them. They're the kids in between -- this block
20 is the two in between where all around the buildings
21 were constantly soot covered, but these two weren't in
22 1910 to '20s, and that makes them significant, not just
23 as skyscrapers that didn't get dirty and could be sort
24 of self-washed. And it makes them significant because

1 they're of a terra-cotta age that's right in between the
2 early terra-cotta and then the later terra-cotta.

3 So they're superb examples for terra-cotta, and
4 if you tear them down you do have a big hole and you
5 lose that aspect which for a world heritage is quite
6 significant because you can argue about the history of
7 terra-cotta in Chicago. You don't have to go to Tulsa
8 or some other city to see what Chicago has done and
9 possibly takes away. Those are my comments.

10 Thank you very much.

11 MR. WEBB: Thank you, Rolf. And thank you for
12 your patience while we waited.

13 Okay. So we'll go to John Borgman. Is John
14 here? Very good.

15 MR. BORGMAN: Hi, my name is John.

16 I speak as a resident of Chicago for over two
17 decades and as a board member for The Institute of
18 Classical Architecture and Art.

19 I'd simply like to say somebody mentioned here
20 about the UNESCO, there is an active proposal for, I
21 believe, nine sites for early American skyscrapers in
22 Chicago. I believe that the Century and Consumers
23 Buildings are direct descendants of those buildings that
24 are in those sites being considered by UNESCO.

1 So essentially the story of Chicago's
2 architecture will be discontinuous with the loss of the
3 Century and Consumers Buildings, so the link between
4 Sullivan, Jenny, Root, Atwood, Roche, and Holabird onto
5 Mies Vander, Bertrand Goldberg, Curtis Graham, Fossler
6 Kauhn, Stanley Tigerman and currently John Ronan, Carol
7 Rusbarman, Jean Davis [all names phonetic] and others,
8 that's story will be cut with the loss of these
9 buildings and I believe it's not a moderate benefit to
10 Chicago to save them.

11 Thank you.

12 MR. WEBB: Thank you, John.

13 Is Brian Whitlock here? Brian, go ahead. Thank
14 you.

15 MR. WHITLOCK: Thank you.

16 Brian Whitlock, I'm a 69-year resident of the
17 city of Chicago.

18 I live at Jackson and Michigan, and I'm the
19 president of the Metropolitan Tower Condominium
20 Association, which is a building that is of historical
21 significance also. We're celebrating our 100th year
22 next year.

23 It's important, I think, to preserve the
24 character of the city and so adaptive reuse I think

1 would be my first preference in terms of the property.
2 But I think the environmental impact statement does
3 ignore the fact that demolition, if it was to go
4 forward, would at least free up the space and allow it
5 to be developed otherwise.

6 I submitted comments with my registration. I'll
7 echo some of those comments that -- They are that -- and
8 I would like to remind the GSA that the zoning for this
9 area is educational at this end of State Street and so
10 as educational space, we're surrounded by a number of
11 universities and also high schools that lack theatrical
12 space and performance art space. The north end of State
13 Street is the theater district and that center part of
14 State Street is retail.

15 I think if the space was readapted or it was
16 replaced in demolition, I think to have some sort of a
17 fine art center would be a wonderful addition to this
18 space, so certainly on the lower levels and lower floors
19 to have that be theater, theatrical-type and performance
20 arts space, have educational and classrooms on the
21 middle floors, and then perhaps lean on the comments
22 that were by the Dreyfus [phonetic] people having the
23 upper floors perhaps be repurposed and to some other
24 governmental space and relocate governmental employees

1 out of the spaces that, perhaps, could be sold and have
2 those people move back into the downtown central
3 corridor I think would be important.

4 So I think reuse of the space would be the best
5 alternative. Doing nothing as -- has been detrimental
6 to State Street. Doing something I think is imperative,
7 whether that's demolition and replacement, whether it is
8 adaptive reuse.

9 I think something needs to be done. We just
10 can't keep going along. State Street is dying, and I
11 think doing something, particularly something that might
12 bring back and be adaptive in connection with the
13 theatrical and educational would certainly help
14 resurrect some of the retail space in the center of
15 State Street as well.

16 Thank you.

17 MR. WEBB: Thank you, Brian.

18 So that's the extent of the speakers who have
19 signed up to speak in person. So now there's a couple
20 of people who were not online when we called their name.
21 Let's go to them and then we'll go back to the people
22 who were -- who -- those of us in the room could not
23 hear their testimony. But one of the person signed up
24 to speak online who has not spoken yet, that's Joseph

1 Antunovich. Carla tells me the Wi-Fi is as good as it's
2 ever been.

3 So, Joseph, if you're still online, we're ready
4 for your testimony.

5 MR. ANTUNOVICH: Good afternoon.

6 My name is Joe Antunovich. I'm the CEO and
7 founder of Antunovich Associates, an architectural firm
8 here in Chicago. I've lived in Chicago and worked in
9 Chicago for the last 50 years as an architect. I'll
10 make a few comments here and then we will also submit a
11 written document expanding my comments.

12 Our firm has worked as restoration architects on
13 buildings in Chicago and mainly on State Street. We
14 renovated the former Goldblatt Building, the historic
15 Goldblatt Building, for DePaul University, a little
16 south of the subject property. And also north of the
17 subject property we restored the beautiful Reliance
18 Building from a decrepit falling down office building
19 into one of the gems of American architecture, bringing
20 it back from office to a hotel.

21 As mentioned earlier, both those buildings are
22 beautiful terra-cotta enclosed buildings, much like the
23 buildings that we were discussing at 202 and 220 State
24 Street. Our experience with this site goes even

1 further.

2 In 2017, we were part of a development team that
3 looked at the feasibility of adaptive reuse for these
4 important buildings, these beautiful terra-cotta
5 buildings that form the nucleus of development along
6 State Street. Right now they sit as a missing tooth in
7 the development all the way along our great street.

8 Our studies in 2017 and presented to both the
9 city of Chicago and the GSA address all of the safety
10 concerns that were raised by the GSA and our mixed use
11 development created almost 500 new residential
12 apartments in the three buildings that are being
13 discussed today, in addition to 25,000 additional square
14 feet of retail on the ground floor.

15 To renovate and to bring back these buildings
16 with activities such as these is exactly what our city
17 is craving and what The Loop needs to bring people back
18 into the heart of our city. Please, please, do not
19 demolish these buildings. These are our jewels. We are
20 the caretakers of these beautiful, beautiful buildings
21 and other examples along State Street show how the
22 renovation of these buildings can assist and continue
23 the rebuilding of this great, great, great street.

24 So I encourage you, I encourage you, please, to

1 pursue the viable adaptive reuse option alternative B
2 and do not, do not demolish the gorgeous, gorgeous
3 buildings that great architects in the past have passed
4 on down to us for our care and loveable, loveable
5 nourishment.

6 Thank you very much.

7 MR. WEBB: Okay. Thank you, Joe.

8 Let's move back through the people online. Is
9 Kandalyn online, Carla?

10 Okay. It looks like Kandalyn is not online.

11 So there's two people who gave online comments
12 that we could not hear the whole thing. That was Anna
13 Mizzi and Brian. So I'm going to suggest we go to Anna.
14 We were having Wi-Fi problems, Anna, when you started
15 your testimony. So if you wouldn't mind, if you're
16 still online, could you give your comments again,
17 please?

18 MS. MIZZI: Sure.

19 Hello, my name is Anna Mizzi, and I am a fourth
20 generation Chicagoan.

21 As such, I love this city and hope that the GSA
22 uses their unique opportunity it currently has to choose
23 to restore and repurpose these buildings rather than to
24 demolish. They are beautiful buildings with intricate

1 design that speaks to the historic majesty of Chicago.
2 Buildings like these are no longer constructed and
3 cannot be made as the materials and scope are a thing of
4 the past.

5 As a federal employee, a former purchase card
6 holder, and a current core [phonetic], I know the
7 responsibility the government has to make fiscally sound
8 use of taxpayer dollars. The federal government is also
9 encouraged to make environmentally conscious decisions
10 for purchasing.

11 By choosing to repurpose, this could be seen as
12 a feather in the GSA's cap to adhere to both. Aside
13 from the 56 million dollar demolition and any costs to
14 rebuild, assuming about 10 million dollars a floor,
15 there is also the environmental cost of any chemical,
16 particles in the air during demolition, the landfill
17 waste that is produced, and then the raw materials to be
18 used as well as.

19 Lastly, there are interested groups desiring to
20 repurpose the space that would meet NEPA security
21 required for the Dirksen Building which was the impetus
22 of the original purchase. As for the future use of this
23 site, it is evident that the presence of the buildings
24 do not pose a risk on their own.

1 I am a resident of Printer's Row, which is just
2 about four blocks south, and this is my neighborhood.
3 The Loop does not need more vacant lots and empty
4 storefronts, office use downtown is declining and there
5 are grants currently in place to bring businesses back
6 to the LaSalle Corridor, so there's little need for the
7 typical reasons for new construction. I am in favor
8 of -- for these buildings to remain and be repurposed as
9 an archive or such.

10 Thank you.

11 MR. WEBB: Thank you, Anna.

12 So the only other person who signed up to speak
13 online that we have not heard from is Brian.

14 MS. BLASIUS: Excuse me. I signed up to speak
15 in person. My name is Elizabeth Blasius.

16 MR. WEBB: Okay. I'll tell you what, let me
17 ask -- one moment. We got our Wi-Fi working. Let's
18 have Brian. Brian started to give his comments twice
19 and we couldn't hear. So, Brian, if you are still --
20 Brian, if you are still online, please give your
21 comments and then we'll go to while next.

22 MR. HODAPP: Okay. Can you hear me now?

23 MR. WEBB: Yes. We can, Brian. Thank you.

24 MR. HODAPP: Great.

1 Hello, everyone. I am a long-time resident of
2 the city of Chicago, and I'm passionate about protecting
3 the architectural legacy of our city. I am speaking
4 simply as a city resident without any agenda other than
5 the desire to ensure the Century and Consumer Buildings
6 are preserved for future generations and I -- my hope is
7 that repurposing the buildings as possible instead of
8 destruction as and demolition as the solution.

9 I, along with the public, would like to come out
10 broadly in defense of these buildings and their historic
11 character which contribute to The National Register of
12 Historic Places and there are a range of reasons not to
13 demolish these buildings. Post-war urban renewal gutted
14 viable commercial corridors and destroyed neighborhoods
15 and, today, South State Street already has dozens of
16 retail vacancies because of pandemic era closures.

17 And demolition of the Century and Consumers
18 Buildings would be bad for business. It would create an
19 additional void on Chicago's most iconic thoroughfares.
20 The demolition is also highly bad for the -- very bad
21 for the planet. Post-war urban renewal consigned entire
22 neighborhoods to the trash heap. It wasted resources
23 and energy.

24 So sending millions more pounds of the Century

1 and Consumers Buildings, terra-cotta, brick, glass and
2 metal into a landfill would be very anti-environmental
3 friendly. It's been contended that the Centuries and
4 Consumers Buildings have been vacant and unused for
5 years and have fallen into serious disrepair, leaving
6 demolition as the only option, but let's make no mistake
7 that this disrepair is the direct result of GSA's lack
8 of maintenance and care for the buildings and it's not a
9 reason for their demolition.

10 Meanwhile, the GSA has expertly maintained the
11 Dirksen Federal Building, replacing the exterior curtain
12 wall in 2006 and repainting the complex with black
13 paint. The GSA owns an inventory almost 500 historic
14 buildings spanning over 200 years of American
15 architectural history. Each of these buildings demands
16 that GSA consider design, security in planning
17 surrounding the buildings in concert with the area
18 surrounding them.

19 It's been argued that the Century and Consumer
20 Buildings are too close to the Dirksen and that no plan
21 put forth for private redevelopment has addressed the
22 security risk, yet the Dirksen is within the dense urban
23 core of downtown Chicago adjacent to numerous buildings
24 including 131 South Dearborn and the Monadnock Building

1 at 53 West Jackson.

2 How can proximity to these buildings be
3 considered safe while The Century and -- proximity to
4 The Century and Consumer Buildings is not?

5 Urban renewal is widely agreed to have been a
6 mistake with devastating consequence that reinforce
7 segregation, increased dependency on the automobile and
8 wiped entire neighborhoods off the map. Let's not
9 repeat this mistake today.

10 If GSA claims that The Dirksen Courthouse is at
11 risk, then the GSA should have the expertise and
12 resources to mitigate that risk by not devastating a
13 neighborhood, The Loop, but reassessing the safety of
14 the courthouse and seeking a safe, private redevelopment
15 plan for the Century and Consumers Building. This is an
16 approach that is completely feasible and cost effective
17 for the GSA and it will preserve the vibrant, dense,
18 commercial core of the city, The Dirksen Building
19 serves.

20 I hope that the GSA can work to make this not a
21 gravel pit in the heart of The Loop, the future legacy
22 of the site of the Century and Consumer Building.

23 Thank you.

24 MR. WEBB: Thank you, Brian. I thank you for

1 your patience while we worked through the Wi-Fi issues.

2 Okay. So we have --

3 UNKNOWN: Tara --

4 MR. WEBB: Well, we'll have this young lady
5 speak. I told her she could go next. So go ahead. And
6 then Tara signed up to speak online. We'll go to Tara
7 next.

8 MS. BLASIUS: Good afternoon.

9 My name is Elizabeth Blasius. I'm an
10 architectural historian and co-founder of Preservation
11 Futures.

12 Our office is in the Monadnock building, and my
13 professional background includes work on natural
14 disaster recovery and mitigation for FEMA, and the
15 sensitive retrofit of historic buildings that may be
16 sensitive to or the subject of an act of terror under
17 the Department of Homeland Security's targeted violence
18 and terrorism prevention grant program.

19 For the record, I stand in solidarity with my
20 colleagues here in Preservation. I have specific
21 comments on the other alternatives considered and
22 dismissed as they relate to the retrofitting of the
23 Dirksen Courthouse. The section is one paragraph. The
24 reason we are discussing the proposed demolition of

1 these buildings, the safety at the Dirksen Courthouse is
2 owed more than just this one paragraph in the draft EIS,
3 and the GSA needs to provide more detail on that with
4 respect to its responsibility to the public and public
5 properties.

6 I understand the undertaking is to address the
7 potential security vulnerabilities associated with 202,
8 220, and 212 South State Street to effectively manage
9 the security risks at the Dirksen Federal Courthouse.
10 And the undertaking is to address security measures at
11 the Dirksen Courthouse, the undertaking is, per the
12 logic and process of NEPA and NHPA and 106, should be
13 fully articulated and explained for the benefit of the
14 public.

15 In the draft EIS, the paragraph references an
16 earlier section, 1.3.1 that states, "the ability of the
17 federal government to retrofit the Dirksen Courthouse
18 with countermeasures to address known security needs
19 would be infeasible from both a construction and then
20 cost consideration standpoint."

21 Section 2.3.1 then states, "security, numerous
22 studies by the FBI and the United States Marshal Service
23 have demonstrated that additional countermeasures at the
24 Dirksen Courthouse are cost prohibitive and not possible

1 because of the design and the construction of the
2 Dirksen Courthouse.

3 Additionally, other suggested countermeasures,
4 such as blackout curtains, are not acceptable security
5 standards.

6 I want to speak briefly on construction and the
7 cost consideration of that earlier section. The
8 countermeasures hang on the U.S. Court Design Guide,
9 which states "exceptions can be made to the design
10 guides standards if they are approved by the respective
11 authorities and reasons for renovation can be guided by
12 a modernization of major repair and alteration project
13 planned by the GSA to address aging buildings systems or
14 to upgrade current standards and codes."

15 There are acceptable security standards
16 explicitly stated by the design guide, but we need more
17 detail on what has been done to the Dirksen to mitigate
18 security concerns. To summarize, we need to hear
19 specifically from the FBI, the U.S. Marshals Service,
20 the Dirksen Courthouse Security and Safety Committee,
21 with respect to the to, you know, of course, our own
22 security.

23 To understand how these have been analyzed, the
24 flexibility of the U.S. Courts Design Guide, and the

1 ability for Congress to allocate funding needs to be
2 fully expanded, that 53 million that was allocated to
3 demolish the buildings, that same money could go right
4 to the Dirksen per Congress. Congress. Thank you.

5 MR. WEBB: Thank you.

6 And it was Tara that was signed up to speak
7 online, Carla?

8 MS. MYKYTIUK: Yes.

9 MR. WEBB: Okay. Go ahead, Tara.

10 MS. TOREN-RUDISILL: Hi, can everybody hear me
11 okay?

12 MR. WEBB: Yeah. Thank you.

13 MS. TOREN-RUDISILL: Okay. Thank you. My name
14 is Tara Toren-Rudisill. I am currently a senior
15 associate with Klein and Hoffman. We're an architecture
16 and structural engineering firm here in Chicago. My
17 comments today are my own.

18 For the better part of the past 20 years, I've
19 had the privilege to be one of the building consultants
20 on behalf of various architects of record for both 202
21 and 220 South State Street. I'm one of a very few
22 people who have had the opportunity to observe the
23 facades close up 100 percent.

24 I would like to first commend the local GSA

1 staff for their efforts to maintain the facades with the
2 extremely limited resources and funding available to
3 them. Work, repair work, has been -- was designed in
4 accordance with preservation standards and completed by
5 qualified contractors.

6 Over 100 years of atmospheric pollution has
7 diminished the grandeur of these buildings, but the
8 facades are salvageable. If restored, these buildings
9 will rival The Wrigley Building and other Chicago
10 landmarks.

11 Regarding site security, removal of these two
12 buildings would open up numerous site lines between the
13 court and several privately owned buildings and parking
14 structures in the immediate vicinity of the building --
15 of the court.

16 Both historic buildings and the site can be
17 hardened. There are several firms that specialize in
18 both threat assessment and protective design that can
19 develop necessary solutions for historic structures,
20 including firms located here in Chicago.

21 It is my fervent hope that limited
22 understandings of all of the issues affecting this
23 specific site are -- are discussed more holistically and
24 that a limited understanding does not result in the

1 destruction of these gorgeous buildings that are part of
2 the foundation of the city of Chicago and its heritage.

3 Thank you.

4 MR. WEBB: Thank you, Tara.

5 Carla, is there anyone else online signed up to
6 speak?

7 MS. MYKYTIUK: Nobody else online.

8 MR. WEBB: The other person was Richard Prinz.
9 Okay. While Carla is checking that, is there anyone
10 else in the room here who would like to give comments?
11 I see two hands go up. This gentlemen, I saw your hand
12 first and then we'll go to the lady in the back.

13 MR. TEMPKINS: Built from 1902 to 1905 --

14 MR. WEBB: I'm sorry, sir. Could you state your
15 name first?

16 MR. TEMPKINS: Oh, I'm Ryan Tempkins [phonetic].

17 MR. WEBB: Thank you.

18 MR. TEMPKINS: I'm a 33-year resident of
19 Chicago.

20 Built from 1902 to 1905, 19 stories ornately
21 terra clad -- terra cotta-clad office building and
22 demolished. Does this story sound familiar? This is
23 not the Century nor Consumers Buildings though, it was
24 the Republic Building located at 29 South State that was

1 demolished in 1961.

2 Unlike the Century and Consumers Buildings,
3 which are being discussed for demolition due to
4 abandonment and neglect, the hands of the slumlord that
5 eminent domained them in 2005, the Republic Building was
6 torn down to make way for the new, but shorter, Federal
7 Home Federal Savings and Loan Association Building.
8 Next door to the Home Federal Building is the 1949
9 Woolworth Building, currently for sale, but is being
10 marketed as a redevelopment site for a high-rise
11 apartment building.

12 Both of these buildings would sit across from
13 the street from the future security zone should the
14 Consumers and Century Buildings both get demolished.
15 How soon until the federal government then wants to
16 procure these and tear them down since they would now
17 have unobstructed views of the same courthouse which
18 caused the Centuries and Consumers Buildings to be
19 raised in the first place?

20 Precedents are dangerous because once they're
21 set, they're impossible to reverse. If GSA destroys
22 these buildings for security, where does it end? Why
23 not the next two across State? The National Register of
24 Historic Places listed Monadnock Building. The Citadel

1 Building across Adams. The landmark Berghoff Restaurant
2 next door. How many of blocks, how many square miles of
3 vacant land does the federal government need to
4 obliterate for a veil of safety? I chose the wording
5 "veil of safety" deliberately.

6 The Century and Consumers Buildings aren't the
7 problem. They're the excuse. The GSA isn't addressing
8 the root problem, but, instead, trying to cover over the
9 actual problem, like painting over a crack on your wall
10 versus addressing the settling foundation. All
11 Demolition of the Consumers and Century Buildings would
12 do is push the problem across the street or a block
13 over.

14 54 million dollars is a lot of money. Can the
15 courtrooms, judges' chambers and other spaces can be
16 protected for better than 54 million without demolishing
17 more than 200 years of combined architectural history?
18 Yes. And the federal government already knows how to do
19 this.

20 Both The White House and The Pentagon have
21 received well publicized security makeovers decades ago
22 that included bulletproof glass. One security firm says
23 on their website, quote, "Jim Richards, CEO of Total
24 Security Solutions has experience -- experience

1 retrofitting ballistic glass in historic government
2 buildings in and around Washington D.C. He's found that
3 backing existing windows with a second ballistic layer
4 is almost the norm," end quote. The truth is cost.

5 When Joe Biden's predecessor didn't live in The
6 White House, he had the residents in a gaudy, tacky,
7 cheap high-rise at 725 5th Avenue in New York City. The
8 Secret Service are said to have replaced the glass with
9 bulletproof glass. Quote, Lee Mandel, a security expert
10 at IntraLogic Solutions provides some estimates based on
11 his past experience and expertise. "There's bulletproof
12 glass which could be 5 to \$10,000 per window for
13 physical replacement of the glass."

14 If we're to use the high-end of that range
15 \$10,000 to account for inflation since 2016 and divide
16 it into 54 million dollars, the federal government could
17 replace 5,400 in the Dirksen Federal Building with
18 bulletproof glass, in fact, Dirksen has exactly 5,304
19 panes of glass. 78 windows on the long side, 24 windows
20 on the short side, 204 windows per floors, 26 floors,
21 5,304. Not only would there be money left --

22 MR. WEBB: Excuse me.

23 MR. TOMPKINS: -- over, but replacing these
24 windows with thicker, more energy efficient technologies

1 would actually end up saving the federal government
2 money and follow their commitment to being
3 environmentally responsible. Something that Demolition
4 absolutely is not.

5 MR. WEBB: Could you wrap up your comments, sir?
6 Your three minutes is long past.

7 MR. TEMPKINS: The idea to demolish the Century
8 and Consumers Building is shortsighted, and half-baked
9 at best.

10 MR. WEBB: Thank you.

11 Young lady in the back, if you could state your
12 name and go ahead with your comments.

13 MS. KOSIAN: Hi, my name is Celine Kosian.

14 I'm just a resident. I live literally like a
15 block away from these buildings, and I'd just like to
16 say I support adaptive reuse. I think everything should
17 be done to maintain the historical character of this
18 city.

19 I think everyone who lives here knows that --
20 like, architecture, architectural tours, and the history
21 of Chicago is a big draw to tourism, but also civic
22 pride. I also think that there's a lot of demand for
23 any sort of nonprofit work or any active reuse.

24 The government has \$54 million to demolish these

1 buildings, I feel that could be used in a better way
2 that's more productive, more environmentally friendly,
3 and is better for the residents.

4 I think we should remember this is help to all
5 of Chicago. I appreciate the concerns for the federal
6 buildings, but there are also lots of people that live
7 in The Loop and visit The Loop.

8 So, thank you for your time. And I hope you
9 support adaptive reuse.

10 MR. WEBB: Thank you for your comments, Celine.

11 Anyone else in the room interested in speaking?

12 Seeing no hands, we'll go -- okay. We have no
13 indication that anyone online would like to speak.

14 We'll give one more opportunity for anyone online who
15 would like to speak.

16 And hearing no indication that anyone online
17 would like to speak --

18 MR. MULLIGAN: We'll stay on until 5, but we
19 need to dismiss the public from the hearing.

20 MR. WEBB: Okay. So we'll keep the online part
21 of the meeting open until 5, which is the end of the
22 hearing, but those of you in the room, you can be
23 released if you'd like.

24 (4:31 p.m., proceedings concluded.)

1 STATE OF ILLINOIS)
2) SS.
3 COUNTY OF COOK)
4

5 Isaiah Roberts, being first duly sworn, on
6 oath says that he is a Certified Shorthand Reporter,
7 Registered Professional Reporter doing business in the
8 City of Chicago, County of Cook and the State of
9 Illinois;

10 That he reported in shorthand the proceedings
11 had at the foregoing Public Hearing;

12 And that the foregoing is a true and correct
13 transcript of his shorthand notes so taken as aforesaid
14 and contains, to the best of his ability, all the
15 proceedings had at the said Public Hearing.

16 

17 _____
18 Isaiah Roberts, CSR, RPR
19 Illinois CSR #084-004890

20 SUBSTRIBED AND SWORN TO
21 before me this 17th day of
22 November A.D., 2023.

23  

24 _____
NOTARY PUBLIC

Table I-1: Comments Submitted via Eventbrite Registration or Electronic Comment Form

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
EventBrite	Jan Donatelli		9/8/2023	B: Viable Adaptive Reuse if possible. If not, A: Demolition
EventBrite	Janet Elson	Nearby resident and worker	9/8/2023	I think the buildings should be rehabbed and out to a useful purpose such as archives if there is no way to make at least a portion residential
EventBrite	Celine Kosian		9/9/2023	These buildings should be saved and preserved through adaptive reuse. These buildings represent an important part of Chicago's history and significant opportunity to help revitalize a part of State Street that is experiencing high levels of vacancy. I would strongly urge that this body consider partnerships with other civic and nonprofit organizations to find uses for these buildings that would align the security needs for nearby Federal properties.
EventBrite	Jacob Klippenstein	Farwell Courtyard LLC	9/9/2023	I prefer the buildings be rehabilitated and utilized to their fullest extent. We have the opportunity to receive UNESCO world heritage status due to our historic skyscrapers. To demolish or continue to neglect 2 prime buildings would be an utter failure on our part to protect and preserve our cultural heritage. We cannot continue to make the same mistakes of the past and expect progress can be found through wholesale demolition as a form of "urban renew". We must recognize the unique history and character of this part of the loop that is present in these 2 buildings and preserve them for better and higher use for future generations to come.
EventBrite	Barbra Goering		9/10/2023	Preserve. Explore and pursue development as archive buildings. That would be compatible with the academic institutions around the buildings and can satisfy security concerns.
Online Comment Form	Anonymous		9/11/2023	Demolition. The U.S. government owes it to Chicago to develop a beautiful, grand park to compensate the city for the destruction of these properties and for creating a potential dead zone in the city center. The government should ensure the space is attractive and inviting to those who live, work and visit the area - and that it does not become a magnet for crime or loitering. I am skeptical of the security demands posed by the government, but it is clear that those security demands make any alternative to demolition all but impossible.
EventBrite	Anne Morse		9/12/2023	I support Alternative B, Viable Adaptive Reuse of the buildings. There are meaningful and practical proposals for the reuse of these structures. It is aesthetically and commercially undesirable to leave gaps in the fabric of State Street. Having watched the former Block 37 lie fallow for decades, I have no confidence that new structures will be built in a timely manner in this economic climate, with double-digit vacancy rates in neighboring Loop office buildings. Historic buildings are Chicago's pride, and these buildings might be a source of revenue for tourism and hospitality like the Reliance Building, or serve as archives for many businesses and institutions that require them.
EventBrite	Corey Chan		9/12/2023	My preferred alternative is adaptive reuse. These buildings contribute too much to the historical character and culture of Chicago to be demolished.

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Anonymous		9/12/2023	Adaptive Reuse. These are historic buildings which are a critical part of State Street. This is a good opportunity to put residential development on State, with at least 20% of the units reserved for affordable housing. These buildings must not be demolished.
Online Comment Form	Nikolas Gamarra		9/13/2023	I would prefer Adaptive Reuse. High density urban environments have the lowest carbon impact per capita of human development. We should not be demolishing our urban environment. It's a city, cities have tall buildings next to each other. If the feds want privacy they can buy some window shades or move to the suburbs. Don't demolish the city.
Online Comment Form	Anonymous		9/13/2023	B - Chicago is a city that prides itself on its architecture, and these buildings are phenomenal examples of the city's prowess. Destroying these buildings will be a permanent shame on the GSA and create a hole in loop. There are numerous other high rises around the federal courthouse that could all post safety risks. Perhaps rather than utilize demolition by neglect tactics, the GSA needs to fortify the spaces within their own buildings.
EventBrite	Thomas Kasputis		9/14/2023	It is important to save existing structures and not create an empty 'hole' on State St
Online Comment Form	Jason Meter	CTA Traffic Planning	9/18/2023	Street-level access to CTA subway stations, as well as the underground pedway connection between the Red and Blue line stations must be maintained upon completion of any work or demolition at or around the site in question. If absolutely necessary to temporarily impact CTA access or facilities, coordination with CTA must take place as least 30 days in advance of any impacts. Notifications and requests for coordination may be sent to: [REDACTED]
Online Comment Form	Thomas Kwilosz		9/21/2023	These buildings can be repurposed and still maintain Federal Security issues. They are architecturally unique, and significantly contribute the State Street historical retail district.
EventBrite	Mary Brush	BRUSH architects	9/22/2023	BRUSH Architects was asked to design stabilization to both building facades by the GSA. This offer had a very small budget and literally designing stabilization extents while on scaffold. The budget did not cover the access and was pushed for another fiscal year. We did get a good look at the buildings anyway. They do require extensive work but they are salvageable or candidates for renewal. We also assessed the facade of Dirksen. If the security concern is for Dirksen, then follow our recommendations for security glazing and facade changes on Dirksen. Let the other buildings throughout Chicago with views of Dirksen continue to be excellent historic and new innovative architecture.

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
EventBrite	Brian Whitlock	Metropolitan Tower Condominium Association	9/25/2023	The City land use plan has zoned that area for Educational Use. The area between Adams and Washington is zoned Retail Use and the Area North of Washington is the Theatre District. If the space was developed into a Federal Arts Center similar to the Kennedy Center in Washington DC, then it could be used by the neighboring secondary, tertiary and graduate schools as a performing arts center. Multiple theatrical spaces, classrooms and workshops could be placed within the space which could serve as an incubator theatre venues for Community Theater and small theatre groups that currently operate in and around Chicago in store fronts and substandard space. It would allow these groups to perform in a large central business and residential area. It could anchor the development of restaurants and retail development between Adams and Washington along State Street and revitalize State Street.
EventBrite	Anna Mizzi		9/25/2023	Please preserve these buildings.
Online Comment Form	Joseph Olivier		9/25/2023	I agree with the EIS that Alternative A, Demolition would involve significant and long-term negative consequences for the Loop historic business district. It would remove historically and architecturally significant buildings that are a part of Chicago's past. If Alternative B is chosen, these buildings can continue into Chicago's future in a historically and culturally significant way. Option B is clearly the winner here.
EventBrite	Teresa Peek	Tour Through A Lens	10/1/2023	I'm unsure why (or if) these buildings can't be sold to a public or private non-federal entity for repurposing. I think whatever is decided should be within the scope of the current research on "what to do to revitalize The Loop". I don't see these two being mutually exclusive
EventBrite	Laura Lavernia	Advisory Council on Historic Preservation (ACHP)	10/2/2023	ACHP staff has no comments regarding the draft EIS at this time.
EventBrite	Christopher Koepfel	ACHP	10/2/2023	ACHP staff has no comments regarding the draft EIS at this time.

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
EventBrite	Tara Toren-Rudisill	Klein & Hoffman	10/2/2023	For the better part of the past 20 years, I have had the privilege of being the building envelop consultant, on behalf of various Architects of Record, for both 202 and 220 South State. I am one of the few individuals who have performed up-close observations of 100% of the facades. I would like to commend the local GSA staff for their efforts to maintain the facades with the limited funding available - all work completed was designed to comply with preservation standards and qualified contractors were selected to perform the work. Over 100 years of pollution has built up on the facades diminishing their grandeur but both facades are salvageable. If restored, these buildings would rival the Wrigley Building and other well-known Chicago landmarks. Regarding court security, removal of these buildings would open up numerous lines of sight from privately owned buildings and parking garages. Both 202 and 220 (and the surrounding site) can be successfully hardened to increase protection. There are a number of firms that specialize in both threat assessment and protective design that are qualified to develop such solutions for historic structures, including some firms located here in Chicago. It is my fervent hope that a narrow understanding of the buildings' potential does not result in the loss of these beautiful buildings that were once anchors for the development of the City of Chicago.
Online Comment Form	Travis Root		10/3/2023	The only responsible and conscionable choices are Alternative B (adaptive reuse) or a No Action Alternative. Alternative A (demolition) is a horrifying prospect, not only for our city's history, architectural legacy, and day-to-day life around that street corner, but also for setting a precedent of just lazily demolishing anything that poses any security issue. Our post-9/11 paranoia must not be allowed to claim another victim-- American freedom is about accepting risks bravely and responsibly, not demolishing our historic architecture out of fear.
Online Comment Form	Anonymous		10/3/2023	I strongly support preserving these important skyscrapers. The Century and Consumers buildings are important examples of Chicago's heritage of skyscraper construction, and it makes far more sense to reuse them than to destroy these buildings and leave a hole in the urban fabric of the loop.
Online Comment Form	Rob Rion		10/3/2023	I support Alternative B, Viable Adaptive Reuse. These buildings can be rehabbed and provide security to the nearby courthouse. If the buildings are removed there would be no real possibility of new buildings on this site causing loss of density in the downtown area of Chicago. This should have been done many years ago and rehab is the only actual option.

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Anonymous		10/3/2023	<p>I strongly encourage Alternative B for Viable Adaptive Reuse of the Century and Consumers buildings. These are beautiful and historic buildings that deserve a new life, and should absolutely NOT be demolished over unfounded and unimaginative federal security concerns.</p> <p>Speaking strictly environmentally, it is absurd to even consider demolishing buildings of this magnitude if the federal government wants to feign any care in the present climate crisis at all. Renovation and reuse (Alternative B) is much less damaging to the environment and produces far less waste - this should be the only option being considered by a federal entity in our current moment.</p> <p>In the past, there were proposals to convert to residential that the federal government shot down, and I think they should revisit using these buildings to help address the housing crisis that we in Chicago are currently facing. Security concerns within the courthouse seem a moot point to I think any reasonable citizen (given that the courthouse is situated in one of the densest downtowns in the country and already faced by many, many buildings) but stipulations for redevelopment could easily address them - don't face any windows towards the courthouse, and don't allow tenant access to roofs unless such an outdoor space would be enclosed facing the courthouse and overhead. While I think most people in Chicago would love to see these buildings used in a lively manner for residential or community use and not squandered and forced into desolation by an uninterested and unrepresentative federal entity, even the most barebones usage of these buildings as document or library storage purposes would be vastly preferable to seeing these pieces of architectural history lost forever.</p> <p>Please do NOT demolish the Century and Consumers buildings. Doing so would be a tragic moment for the city of Chicago and would show a federal government actively interested in undermining the interests of the communities which it is supposed to serve. I think the city of Chicago deserves a government ready to move away from the empirically destructive and anti-urban policies of urban renewal and demolition that have plagued the federal government for decades and work towards a more imaginative solution that will bring life to Chicago and its downtown, not destroy it.</p>
Online Comment Form	Anonymous		10/3/2023	<p>Support for alternative B, viable for adaptive reuse. Chicago's rich architectural heritage should be upheld and celebrated by federal, state, and city agencies through viable adaptive reuse of the Century and Consumers Building. Adaptive reuse will allow the historic character of State street and the Chicago loop to remain intact.</p>

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Christopher Owen		10/3/2023	I write in full support of adaptive reuse of the buildings located at this address. These buildings are part of the City's architectural heritage - a heritage that has often times been disregarded for no good reason. The adjacent Federal buildings already resulted in the loss of some of the City's architectural gems - particularly the former Federal courthouse building. Demolishing these buildings would only compound the loss. While I understand the security concerns that have been raised, those concerns seem to be exaggerated given the other buildings in close proximity to the Federal buildings where this issue has not been raised. Regardless, I am confident that there are creative solutions that would address any security concerns while allowing these buildings to remain. In short, there is no good reason for these buildings to be demolished. Adaptive reuse should be the default solution here.
Online Comment Form	Anonymous		10/3/2023	These buildings should NOT be torn down. They should be adapted and reused.
Online Comment Form	Christina Peacock		10/3/2023	These buildings should not be torn down - they are historical and architectural gems.
Online Comment Form	Anonymous		10/3/2023	<p>The Century and Consumers buildings are a direct reflection of Chicago's place as the birthplace of the skyscraper. Many of the buildings in this area are under review by UNESCO to be potential World Heritage sites. These two buildings absolutely contribute to that heritage. It would be foolish to tear down these buildings based on nebulous "security concerns" and "student safety" issues.</p> <p>Having worked in the building on a Federal Grand Jury for 18 months, it is obvious that many nearby buildings have direct site lines into the Dirksen building. The Century and Consumer buildings were there 50 years before Dirksen was built and they should remain long after Dirksen is replaced. Demolishing these buildings would be a foolish example of security theater and another case of our culture simply tossing out things that are considered "too old."</p> <p>I have not heard a compelling argument for anything that stands to be gained from demolition, but part of our history will certainly be lost. No different than walking past the empty, fenced-off lot that used to be the beautiful Chicago Mercantile Exchange Building, which was demolished 20 years ago.</p>
Online Comment Form	Anonymous		10/3/2023	These buildings represent a historically important era of architecture in Chicago, but tearing them down also appears to be a waste of existing resources in our city. Let's invest in rehabilitation and bring the building up to code for energy concerns, showing we have a commitment to preserving our history and defining a sustainable future in this city.

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Anonymous		10/3/2023	<p>It is imperative that these buildings be maintained and restored. They are an important piece of architectural history for the city. I strongly support Alternative B Adaptive re-use for these structures.</p> <p>The arguments for demolition for security reasons seem extremally spurious given the location of the court in a dense urban environment. Many nearby high-rises and rooftops already have sightlines into the federal buildings. With these buildings gone, that would not change. In fact, the court would become more visible from buildings to the east. Additionally, the courthouse already has a great, elegant, and well-suited entrance on Dearborn, and a large plaza within the Federal Center. No additional plazas and entrances are needed or desired on State Street. Demolition of these great buildings would be a poor trade for the public.</p>
Online Comment Form	Anonymous		10/3/2023	I OPPOSE the EIS as drafted, because there is not sufficient justification for demolishing the two skyscrapers because of judges desire for lake views. In terms of any security concerns, there is an adaptive reuse plan that meets high security standards that would satisfy those concerns and such there would be no need to demolish the buildings.
Online Comment Form	Blair Rezny		10/3/2023	Please do not tear down these historic buildings. Surely there is another way. Chicago prides itself on its architectural heritage. Tearing these buildings down would be a travesty. Thank you.
Online Comment Form	Aedan Hodgson		10/3/2023	<p>These two buildings are part of Chicago. Monday through Friday, as I stand waiting for the bus, I gaze at the two buildings and become saddened and angered by the notion that the federal government wants to demolish these two historic buildings due to "security concerns." It's lazy. It's cowardly. Generally pathetic, perhaps. If someone wanted to commit an act of "terror" against the courthouse--that, may I remind you, is surrounded on all sides by other skyscrapers--they would have done it by now. The safest option--the cheapest, most logical option--is to simply repurpose the buildings (there is already a repurpose plan in place, FYI).</p> <p>I can tell you with absolute certainty that, even if most Chicagoans don't pay attention to the buildings, they will absolutely notice that they are gone.</p> <p>Federal Government: Quite being annoying and spend your money on things that actually matter. Leave our skyscrapers alone.</p>
Online Comment Form	Laura Stratford		10/3/2023	As do others, I do not think that the \$52M demolition of two important landmarks is warranted when a high-security adaptive reuse plan is ready to go.
Online Comment Form	Anonymous		10/3/2023	Jesus Christ do not demolish those buildings what in the? Seriously what is going through your brains rn?

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Anonymous		10/3/2023	<p>I am a federal employee and work in the Federal Building at 77 W Jackson. Our building is about 20 feet from the adjacent building that houses the Union League of Chicago. If these buildings on State Street are a security concern to the Federal Courthouse, is the building adjacent to my office also a security concern? Will it be demolished? If not, are federal employees in my building less important than those who work at the courthouse? Of course these questions are absurd. None of these buildings should be demolished. Downtown Chicago is a place where one must expect buildings next to other buildings. The federal courthouse should find other security mechanisms. Buy some curtains. Install more bollards. If none of that works, relocate the courthouse somewhere else, similar to the FBI compound on Roosevelt. Don't expect to remake the city to suit the court's needs.</p> <p>Setting aside the preceding objections, and focusing strictly on the purposes of this environmental impact statement, it should be crystal clear that demolishing a building in the middle of the Loop will have negative environmental impacts. Buildings have "embodied carbon" -- that is, the amount of CO2, energy, and materials that went into the construction of the building. Demolition would destroy any potential economic or environmental value. The people and businesses that could use that building will, instead find somewhere else. That "somewhere else" is likely to create additional negative environmental impacts. It will almost certainly have less transit access than the State St locations in the middle of the Loop. It might be in a sprawling auto-centric area, perhaps even outside of the city. And any new buildings constructed to replace the existing buildings (on the same site, or elsewhere) would consume more concrete, plastic, CO2, etc. Wasting what we already have to build something new is definitely not good for the environment.</p>
Online Comment Form	Caroline Wooten		10/3/2023	<p>It is SOOO wasteful to tear down perfectly in tact buildings. Likewise, demolition is a destructive event, and particulate matter will impact people in the surrounding area. Finally, these are BEAUTIFUL buildings. They're part of what give Chicago its character. What would we replace them with? Why would we tear them down</p>
Online Comment Form	Anonymous		10/3/2023	<p>Please do not demolish the historic buildings. They offer a unique addition to the urban environment of the Loop.</p>
Online Comment Form	Anonymous		10/3/2023	<p>We need viable adaptive reuse! Do not demolish our architectural heritage.</p>
Online Comment Form	Andrew Kanwit		10/3/2023	<p>These buildings are an extremely important historical part of the street facing wall along state street. This collection of buildings forms one of the greatest and most renowned shopping districts in the city and country. Tearing down these buildings would put a gaping hole in this important downtown district. And for what? Preserving historic character is essential to keeping Chicago special. Please do not tear down these important beautiful historic buildings and reuse them for something useful.</p>
Online Comment Form	Anonymous		10/4/2023	<p>Please allow us to retain these beautiful historic buildings. I support Alternative B (viable adaptive reuse).</p>

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Maryellen Schwartz		10/4/2023	Destroying existing historic buildings instead of trying to readapt and reuse is unwarranted. The city's old building have been successfully redeveloped throughout the loop and north side which has resulted in desirable neighborhoods .
Online Comment Form	Anonymous		10/4/2023	Demolishing these buildings is a complete waste of money. If security is a real concern then modify the buildings, don't demolish them. Providing federal employees with lakefront views is not a good reason to demolish two skyscrapers in the middle of downtown. Cancel the demolition and use the money to improve CTA service instead. This is a farce.
Online Comment Form	Anonymous		10/4/2023	<p>These are beautiful and architecturally significant towers. They add significantly to the aesthetics of the area, and they would also contribute in other ways if they were put to good use rather than being left to rot by the federal government. It would be disastrous to lose them due to a few judges unrealistic concerns about safety.</p> <p>The court's concern about safety is so ridiculous that it makes me wonder if it is their true motivation. The risk posed by these buildings is vastly less than the risk a judge faces every time they step in a car, or eat a steak cooked medium-rare, or walk into a restaurant in which they could catch a disease. These judges do not get to harm the greater public due to absurd paranoia about the risk posed by these buildings.</p> <p>If the judges are really so concerned about the security risk here, perhaps we could build them new underground offices far away from the dangers of the city. Or maybe the unfinished cavern under Block 37 that Mayor Daley built in anticipation of a rail link to O'Hare would make a nice secure home for them. If these options aren't appealing to the judges, it makes one wonder if what they really want is a better view of Lake Michigan.</p>
Online Comment Form	William Reed		10/4/2023	As a proud Chicagoan, public high school STEM teacher, and believer in government for, by, and of the people, I cannot believe that the GSA continues to seriously consider the demolition of these two historic and culturally significant buildings under such little consideration of alternatives and for such apparently petty (lake views for judges) and solved (security at the courthouse building) reasons. Several of my students, a majority of whom are from low income backgrounds, many of whom live in disinvested neighborhoods plagued by an gun violence, mental health crises, and poverty, pursue architecture as an extracurricular (and, in some cases, career) interest. This interest comes from a concerted effort by many for profit and non profit organizations (Chicago Architecture Center, ACE Mentor Chicago, TYlin Engineering, and many others) to inspire a love of architecture, design, engineering, and construction among the residents of a city with one of the greatest legacies of modern architecture anywhere in the world. To ignore the importance of historic preservation, especially for such structures that speak to the unique historical development of the skyscraper in Chicago, is to fail to understand the values of the people of this city. We do not need bureaucrats from Washington or Senators from downstate dictating the future of our cityscape. For the sake of young and future generations of Chicagoans who could lose forever these wonderful examples of early 20th century skyscrapers (and for what?) please revisit alternatives and immediately stop the plans to demolish these buildings.

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Anonymous		10/4/2023	<p>The GSA should scrap any plans that include demolition of historic buildings and explore true repairs and security improvements.</p> <p>The loss of historic buildings would be a far greater detriment than any potential or imagined security risks to an already secure building.</p>
Online Comment Form	Anonymous		10/4/2023	<p>Alternative 1 (Demolition) is nothing short of an abomination to the city of Chicago and great American architecture as a whole. These significant, historic buildings necessitate Alternative 2 (Adaptive Reuse) in order to preserve the architectural fabric of this city, preserve the historical nature of the Loop, and prevent a blight of empty space. A series of vacant lots in the heart of State Street would stifle the prosperity and growth of the southern portion of the Loop, and send a signal to visitors and developers that Chicago is "Closed for business," promoting a vision of economic downturn not dissimilar to the way that other rust-belt cities are commonly viewed. The notion that an empty lot would be in any way better than these important properties is abhorrent. Furthermore, historic preservation is a vital part of our city's character, and to demolish these existing buildings would send a signal that Chicago (and the federal government) cannot collaborate to save great architecture. It would be a great mistake to demolish these properties.</p> <p>As an architectural designer that works on historic preservation/adaptive reuse projects, I know that Chicago could make great use of these buildings and really send a message that we are a resilient, working city that is proud of our heritage and capable of preserving it.</p>
Online Comment Form	Anonymous		10/4/2023	<p>It is simply shocking to me that even a moment's thought is being given to demolishing these lovely buildings. They represent a critical era in the development of the Chicago architectural school and contribute greatly to the architectural heritage of the central loop. The security arguments being advanced are not at all convincing and even from that point of view, the federal government could surely find adaptive reuses for these buildings that would allow them to be secured along with the rest of the federal complex.</p>
Online Comment Form	Anonymous		10/4/2023	<p>Under no circumstances should the Century and Consumers Buildings be demolished. These buildings are an important part of the historic character of the Loop, and are irreplaceable. While housing is the ideal choice given the city's need for more of it, using the buildings for document preservation is far superior than demolition, as it avoids the major environmental waste of tearing down the buildings, and keeps the Loop the popular architectural destination that tourists and residents alike love.</p>
Online Comment Form	Anonymous		10/4/2023	<p>I do not support the demolition of these buildings. They are part an important architectural history in Chicago and there are better solutions to the problem.</p>
Online Comment Form	Anonymous		10/4/2023	<p>I don't believe these buildings should be torn down. I think they're beautiful and contribute to the feel of the city, especially in the Loop where I work. A major draw to coming into the office for me is the feel of the downtown city and feeling like a part of something. Older buildings like this are historic and will only increase in value as they age and more of these beautiful buildings get demolished elsewhere. I love Chicago's history and feel</p>

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Anonymous		10/4/2023	The architectural and historical significance of the two buildings under threat of demolition is more significant than any short term concerns about security. Other options are available to secure the federal building, rather than a costly and disruptive demo. Please save the buildings!
Online Comment Form	Anonymous		10/4/2023	Adaptive Reuse is the better alternative to these buildings!
Online Comment Form	Ratnika Prasad		10/4/2023	Demolishing these buildings is arbitrary. The creation of a vacant lot in this space will create a dead zone, when these buildings could be adapted for reuse and housing - for which the city has previously received interest. Moreover, these buildings are historical marvels. We urge the GSA to reject this arbitrary and anti democratic, anti housing and anti environmental move and save these building for creative reuse.
Online Comment Form	Anonymous		10/4/2023	Do not tear down the landmark buildings. The only reason they want to tear them down is so the judge can have a view of the lake. Unbelievable this is even on the table
Online Comment Form	Anonymous		10/4/2023	It is completely asinine that the demolition of these buildings is even being considered. Concerns about security are ludicrous and could be addressed in a number of less dramatic ways. Downtown Chicago is an urban environment and should remain as such. The courthouse is not in a suburban office park. I urge you to reject the demolition alternative and return the buildings to use.
Online Comment Form	Anonymous		10/4/2023	There are 9 sites of original Chicago School buildings in Chicago being proposed as UNESCO World Heritage sites, and I believe the Century and Consumers are direct descendants of the 9 buildings in the proposal. Chicago's architectural and cultural story, from the Chicago School to the present day, is discontinuous without the Century and Consumers. Not to mention the other more immediate deleterious effects of demolition. I believe the Century building, in particular, is singular in its architectural, historical, and civic value. Thus I don't support demolition of this structures. A suitable adaptive reuse should be found that preserve these buildings, the streetscape, and the surrounding urban fabric.
Online Comment Form	Jacob Alfieri		10/4/2023	I am strongly opposed to Alternative A. This would create a dead zone in the middle of Chicago's central business district. I support Alternative B or ideally a more flexible plan to use these buildings. They predate the Dirksen Federal Building by nearly 50 years and have not caused any issues.
Online Comment Form	Anonymous		10/4/2023	I am strongly opposed to alternative A, the proposal to demolish these buildings. I strongly prefer alternative B, adaptive reuse. I live under a mile from this location.
Online Comment Form	Nicolas Buitrago		10/4/2023	Strongly support Option B (Adaptive reuse) or No Action. Don't demolish these buildings, why the heck would we waste money demolishing buildings when there's already a housing crisis in chicago. Don't demolish the buildings obviously.

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Alec Schwengler		10/5/2023	<p>It is clear that the Draft EIS is purposely written to support demolition so that judges can have better views of the lake. It is incredibly frustrating to me that the federal government has taken a cultural asset of our city, removed it from the tax rolls and from use, and allowed it to decay to the point of potential demolition. Based on the Draft EIS, it seems that the safety concerns are clearly overblown in order to sway the case for demolition. I do not find the reasons compelling why this building has security concerns but none of the surrounding buildings have similar concerns. Do not tear down our cultural heritage for the sake of a judge's view. I cannot believe this is even being debated.</p> <p>Stop sandbagging this project and save these buildings.</p>
Online Comment Form	Andrew Benson		10/5/2023	<p>There is no world where tearing down a skyscraper is a better environmental choice than simply installing a curtain.</p> <p>The building should stay.</p>
Online Comment Form	David Jameson		10/5/2023	<p>If Chicago is to claim it cares more about architecture than other American city and caters to millions of its architectural tourists, it needs to prove the point by saving its building heritage. A new website about Chicago's architectural history from 1830 to the present day includes these paragraphs:</p> <p>Perhaps the last "Chicago School" construction was Holabird and Roche's skyscraper for Buck & Rayner druggists of 1915-16 renamed "The Century Building" in 1917. John W. Root's son (also called John) had just begun work for the firm and had a major hand in its design.</p> <p>Some historians credit his fascination with Spanish Manueline architecture for its more vertical elevation but, in any case, the 42-foot width (and 101-foot depth) may have been his impetus for the design of the skinny 16-story building verging on Art Déco.</p> <p>Now that we have lost many of our Louis Sullivan buildings, it's critical that we give the hoards of tourists something to see.</p>
Online Comment Form	Hugh Iglarsh		10/5/2023	<p>The buildings in question have both historic and aesthetic value. They are a vital part of the State Street streetscape, and it would be an act of vandalism to tear them down in order to prevent imaginary acts of terrorism. Simply by blocking out certain windows, the buildings could be rendered quite safe. If the courthouse is so threatened by the mere presence of other buildings that long predate it, it should be torn down, rebuilt in the suburbs or countryside and surrounded by a crocodile-filled moat or minefield. Just the fact that this crazy suggestion of tearing down the old skyscrapers is taken seriously shows that we have become a nation of frightened ninnies. Shame on you, Sen. Durbin.</p>
Online Comment Form	Anonymous		10/5/2023	<p>These two structures should remain in tact and be sold for private development/refurbishment.</p>
Online Comment Form	Anonymous		10/5/2023	<p>please rehab these into housing instead of tearing them down, we desperately need more housing</p>

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Anonymous		10/5/2023	Demolishing these buildings is unacceptable. Find a way to preserve them and protect federal employees at the same time even if it's just converting the buildings to federal office space.
Online Comment Form	Lucas Brandt		10/5/2023	We invested lots of energy and carbon into building these beautiful buildings. It would be a total waste, and obvious stupidity, to tear them down. Don't tear down perfectly usable buildings for no reason.
Online Comment Form	Andrew Corzo		10/5/2023	Please do not demolish the buildings. They can and should be adaptively reused such that all security concerns from the courthouse can be assuaged. Those buildings are fine examples of Chicago architectural history and they existed for decades without any of the current concerns coming to fruition.
Online Comment Form	Heather Parker		10/5/2023	Please find a way to keep 220 South State Street without demolishing it. Lots of square footage right there would be convenient to make housing. Demolishing and rebuilding would have a big impact on wasted resources.
Online Comment Form	Sean Haran		10/5/2023	I think it is ridiculous that this demolition is even being considered. The security threats are not credible to say the least and the building is architecturally exquisite. Furthermore, the demolition of these buildings will create a "dead-zone" in an area that is already struggling. Instead, these skyscrapers should be reused and converted into apartments and commercial space. Doing so would get rid of any security threat without having an extremely adverse affect on the surrounding environment. It would also help add pedestrian traffic to State Street, something that is crucial to its recovery from the pandemic. Please save this building from demolition!
Online Comment Form	Anonymous		10/5/2023	Demolition of these two buildings would be a baffling decision by the GSA. These beautiful structures have stood in their current location for decades now - long before the adjacent federal complex was ever constructed - and they have continued to exist and remain occupied for years afterward, without incident. Leveling half a block of historic architecture for theoretical security concerns is incredibly short-sighted and inexcusable. Relocate the federal complex to an empty field somewhere if you're so worried about having neighbors.
Online Comment Form	Anonymous		10/5/2023	I am writing in support of rehabbing and adapting the historic skyscrapers for future generations.
Online Comment Form	Mark Burger		10/5/2023	Preserving the present buildings is not a knee jerk NIMBY reaction to change. These are already sufficiently sized buildings for the Chicago Loop. Even with significant rehabilitation costs, saving the buildings would reduce time and embodied energy, plus maintains the inherent character of the area. We don't need more sterile glass towers in the Loop, as much as incumbent decision makers would like that soul deadening process to continue.

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Andrew Hickner		10/5/2023	<p>I oppose Demolition (Alternative A). GSA's proposal to demolish these historic buildings is stupid and unnecessary; the concerns of the . Ideally, they should be turned into apartments as previously proposed in 2017. If Alternative B is selected, restriction #2 (Occupancy/use) should be modified to allow residential or lodging. Please see this article for more information: https://slate.com/business/2022/05/chicago-consumers-century-buildings-dirkson-courthouse-durbin.html. Key excerpts:</p> <p>"There's also the question of what happens once the site is a vacant plot of "secure" landscaping: The Dirksen is 90 feet away, but it is not much further to neighboring structures including the Monadnock Building, one of America's finest early skyscrapers. "The difference between 75, 100, or 200 feet for a rifle is none," said Atlas, the architect and security consultant</p> <p>"It is also not clear why the standards being applied to the Dirksen are not relevant to the country's other federal courts. Virtually every city has a downtown courthouse surrounded by offices, hotels, and apartment buildings."</p>
Online Comment Form	Anonymous		10/5/2023	<p>Thank you for the comprehensive review provided in the EIS. 202, 204, and 220 S State St are located in a stretch of the Loop that is critical for the success of Chicago's downtown, and activating these lots has the potential to re-invigorate a stretch of Michigan Avenue long-plagued with diminishing occupancy.</p> <p>Retail vacancy rates in the central Loop, which includes State Street, rose to 27% in 2023, a record high. Office vacancy throughout the loop averages 20%, but is mostly concentrated in inner-loop, vintage buildings. The proliferation of remote work has resulted in diminished demand for office space, and has resulted in more space than ever sitting unused in Chicago's downtown. I personally work with Loop office buildings and have seen how the leasing market has degraded while taxes, maintenance, and staffing costs have risen. The economics of running a well-maintained vintage office property in the Chicago loop are extremely challenging, and are likely to stay that way.</p> <p>These buildings have fallen into a state of disrepair. The scaffolding and graffiti outside are at best uninviting, and at worst give cover to vagrancy. The dead space on State Street creates a menacing atmosphere and detracts from the city's goals of a vibrant, engaging streetscape.</p> <p>Inside, the properties face millions of dollars of capital costs necessary to restore the offices to working condition. This, combined with the costs and restrictions laid out in the EIS - no conversion to residential housing allowed, no sightlines into the Dirksen Courthouse allowed, no parking on premise, and mandatory staffing of 24-hours security at developer's expense - render the proposal to restore the buildings economically infeasible.</p> <p>The committee must consider what best serves both the court's needs and the needs of the residents of Chicago. Downtown Chicago would be best served by the creation of a public plaza with additional low-rise retail and dining options that helps create an inviting, vibrant streetscape. The best option for the court and the people of Chicago is to demolish these long-neglected eyesores and finally allow these parcels to be adopted into space that adds to downtown, instead of detracts from it.</p>

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Tommy Hoyt		10/5/2023	I support tearing down the vacant buildings on North State Street. At present, these buildings are unsafe and unsightly. Their condition will only deteriorate if left standing—posing an ever greater risk to the community. This district suffers from high vacancy and depressed foot traffic. It will benefit by converting these parcels into green space and/or well-lit public amenities.
Online Comment Form	Anonymous		10/5/2023	<p>At a time when the future of the State St corridor is at such an inflection point, the last thing the community needs is a large vacant lot or low-density development. To tear these buildings down would be harmful to the neighborhood, and the city, eliminating two historically significant structures for no good reason.</p> <p>Workable solutions are surely possible to revitalize both buildings while preserving the security of the adjacent courthouse. Such alternatives have been presented. The only reason put forward to tear these buildings down are to improve views for the adjacent court house which is as far from a legitimate reason as one can get.</p> <p>In sum, tearing these buildings down would harm the neighborhood by creating a gap in an already struggling street scape, and would serve no real purpose. Alternatively, repurposing both buildings could act as a n anchor to help the entire neighborhood while preserving security for the adjacent buildings.</p>
Online Comment Form	Anonymous		10/5/2023	<p>I'm in support of saving these buildings from being torn down. We must preserve our history and Chicago can't afford to have dead zones in the middle of the Loop, especially with the Loop suffering to regain full vibrancy since the start of the Covid-19 pandemic.</p> <p>If there is a security concern for a particular federal building, maybe the answer is to move the security-sensitive functions out of these buildings instead of "eliminating the threat" through the ridiculous idea of tearing down gorgeous, historic, visually unique buildings.</p>
Online Comment Form	Anonymous		10/5/2023	Don't tear these buildings down! Rehab!
Online Comment Form	Colin Young		10/5/2023	We cannot demolish historic buildings on State Street and expect the street corner, previously one of the most vibrant in the world, to thrive. Security concerns are ridiculous and regardless, the federal building should relocate if it's such a problem. Further, demolition and rebuilding another building will mean more embodied carbon emissions, which of course has an impact on the environment. Please refurbish these buildings into affordable housing to bring residents and vitality to State Street.
Online Comment Form	Anonymous		10/5/2023	We need not destroy buildings from our past. Perhaps another issue is at hand leading to terrible security concerns. What did the buildings do to deserve this?

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Anonymous		10/5/2023	<p>The Loop is admittedly going through a tough time right now. The answer is to keep these beautiful buildings, and turn them into something useful, such as the proposed plan to rehab them into downtown housing units! More people downtown = more life downtown. House people in the neighborhood and watch it thrive. And keep the buildings that help make downtown Chicago so gorgeous to walk around!</p> <p>As Lee Bey eloquently stated, "The building's demolition would create an economic and pedestrian dead zone on State Street, something neither the street nor the city can afford. And it would be a shameful waste of some really good Chicago architecture."</p>
Online Comment Form	Anonymous		10/6/2023	<p>I read that to tear the buildings down will have a negative impact environmentally. It also will make State Street much less interesting visually. In contrast, to turn the buildings into affordable housing will bring vibrancy to the central city and is a great use of federal money and a great way to role model how the government should work.</p>
Online Comment Form	Aaron Brown		10/7/2023	<p>I strongly oppose the proposal to demolish these invaluable buildings and am aghast that the federal government would even consider it.</p> <p>As a Chicagoan, I believe that two things that make our city great are (a) our dense, active downtown and (b) our architectural heritage. This demolition would strike at both, putting the security state (and vastly overblown security concerns) in front of the lives of everyday Chicagoans who will need to live with a dead space in the middle of a vibrant downtown.</p> <p>There are plenty of other options here - including The Chicago Collaborative Archive Center - that would meet the security criteria while preserving these buildings, at the same or lower cost. Shame on the GSA for even considering this demolition.</p> <p>I hope the legislators who purport to speak for the citizens of Chicago will step up here</p>
Online Comment Form	Anonymous		10/8/2023	<p>ALTERNATIVE B!</p> <p>The fact the feds are considering tearing these buildings down is despicable. If judges chambers are so important then put up a damned curtain, DO NOT tear down our shared heritage. The fact i even have to write this is sad</p>
Online Comment Form	Anonymous		10/8/2023	<p>I think we need to save historic buildings. This could be a big draw to the area. The court can figure out its own security issues</p>
Online Comment Form	Anonymous		10/9/2023	<p>Please find a way to re-purpose rather than demolish the two buildings at State & Adams in Chicago, IL. This would be highly preferable for environmental reasons to avoid the waste from the buildings and the need for new materials, and historically to preserve these gems of Chicago architecture.</p>
Online Comment Form	Anonymous		10/9/2023	<p>Please save our beautiful buildings and history!</p>

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Nithin Philips		10/10/2023	<p>As a resident of the City of Chicago, I support Viable Adaptive Reuse (Alternative B) proposed in the EIS with some caveats.</p> <p>A dense, populated (with people and buildings) and welcoming downtown is essential to the future of Chicago. As GSA must know very well, the city is currently facing changing economic conditions regarding the use of the downtown and it is critical that any changes made will stabilize the area economically and ensure a prosperous future for the city and the downtown area.</p> <p>A downtown lot that is vacant or used for the storage of cars is not useful to the citizens of the Chicago. It appears that GSA does not have the funds to repair and keep these buildings in good condition, and it then follows that GSA does not have the funds to build another structure at this location that would meet the security conditions that are placed upon these sites. Further, it may be difficult to find a developer willing to work with all the restrictions without having to pay costly incentives, which are again currently unfunded. So, in effect, what we are being offered is several vacant lots for the foreseeable future. I echo the sentiment from Kevin Harrington from IIT that the Federal Government's stipulations for adaptive reuse is draconian and is presented simply there to justify the decision to demolish these building anyways and make the government appear reasonable.</p> <p>These concerns do not even begin to address the loss these historic and beautiful buildings will have on the downtown skyline.</p> <p>The GSA and the Federal Government can and must do better. GSA should consider the impact of their decisions on the vibrancy and the future of downtown Chicago and should strive to make a fair and prudent decision, not the most expedient one.</p> <p>Please work with the local experts and stakeholders (and consider their feedback) to ensure that the security of the courts, preservation and the future economic prospects of the city are all given due consideration.</p>

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Lee Brown, FAICP		10/12/2023	<p>The Draft Environmental Impact Statement must be rejected and rewritten to eliminate its fundamental flaws. The DEIS is prejudiced and presents a false trichotomy: 1. Do nothing (an alternative required by NEPA, but allows GSA to continue to be a malevolent property-owner intent on the elimination of the buildings); 2. Adaptive reuse, but limited by unreasonable self-imposed restrictions; or, 3. Demolition (GSA's irreverent preferred choice.)</p> <p>The DEIS suggests that the threat to Federal properties demonstrated by the events of 9/11, and later a site specific threat on the Dirksen Courthouse in 2005 was GSA's original motivation for eminent domain acquisition of the subject buildings along with other property between Adams and Jackson Streets beginning in 2005 and completed in 2007. The DEIS states: "The goal of acquiring these proximate parcels of land was to "allow GSA to improve security by enhancing its ability to control access to the parking ramp leading into the Dirksen Courthouse," to "provide greater control of Quincy Court . . . and allow GSA to create a buffer zone integral to the security of the courthouse," and to "increase security by eliminating the possibility of private sector development proximate to the Dirksen Courthouse." The DEIS also states: "Federal law enforcement agencies extensively studied and determined that the buildings pose a specific and significant security threat to the Dirksen Courthouse (ATF 2017, 2020; FBI 2018; U.S. District Court Northern District of Illinois 2018; Administrative Office the U.S. Courts and USMS, n.d.). Note that these "studies" of the threat were conducted 12-15 years after the initial eminent domain acquisition of the subject properties aimed at security threats, not before the commitment of funds for acquisitions. By dismissing retrofitting the Dirksen Courthouse as "...cost prohibitive or not possible..." GSA does not present a full and fair discussion of significant environmental impacts of what experts in architecture and construction consider a reasonable alternative from being compared to alternatives the agency prefers, and does not provide evidence that the Agency has conducted the necessary environmental analysis.</p> <p>The public purpose of that eminent domain did not anticipate demolition for purposes of creating a public open space as in now contemplated. GSA officials had at the time of acquisition expressed the intent to use the buildings as an extension of its Federal campus in conjunction with security improvements. At first, only the building at 230 S. State was renovated and occupied for Federal Offices. For reasons not explained, the need for Federal office space had declined soon after the acquisition of the subject property, and the GSA began to explore its alternatives. By 2010, recognizing the significant historic value of the buildings, the GSA began discussions with local historic preservation agencies and experts concerning adaptive reuse. During the period of GSA's ownership, the subject buildings have been unoccupied and have been allowed to decay to the point that the GSA began to deconstruct portions of the building they deem to be a safety threat. The Agency also sought and received an appropriation of \$52 Million in 2022 for the express purpose of demolishing the structures, prior to the preparation of a Draft Environmental Impact Statement examining the alternatives to demolition. If not a direct violation of NEPA, (see 40 CFR 1502.2 (f) "Agencies shall not commit resources prejudicing selection of alternatives before making a final decision"; and 40 CFR 1502.2 (g) "Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made.") then these funds further evidence GSA's negligent "maintenance" that advanced it's desire to justify demolition.</p>

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Lee Brown, FAICP (continued)		10/12/2023	<p>Through personal knowledge and journal reports, the City of Chicago actively sought the reuse of these properties through the issuance of an RFP which collected legitimate private interest and rational proposals from qualified developers. It was reported at the time that these efforts were rebuffed by the GSA in response to a Federal judge who was concerned due to the proposals inclusion of rooftop deck and accessible windows facing the courthouse. This arbitrary restriction ignores the fact that there are multiple privately owned buildings with proximity and visibility of the courthouse and the access to the parking under the courthouse which have rooftop decks and in some cases accessible windows which, without the hardening and protection of the Dirksen Courthouse itself will continue to pose a threat irrespective of the subject properties. As such, the ultimate disposition of these properties must be considered in addition to hardening of the courthouse, not in lieu of hardening the courthouse. If the subject properties are demolished as is GSA's preference, it will directly expose the eastern side of the Dirksen Courthouse to other buildings and rooftops east of State Street. How many more buildings will the GSA need to condemn to protect its flanks?</p> <p>The GSA's introduction of "viable adaptive reuse" restrictions to occupancy by "...residential or lodging, places of worship or medical treatment, services, or research" are not determinative of Courthouse safety or security. There are many examples of these prohibited uses which have at least one blank wall and no rooftop access for occupants, making them just as safe and viable as uses not prohibited in this list. This is GSA's attempt to blame the symptoms not the cause. It also prejudices the DEIS and fundamentally undermines the potential for rational, secure and viable reuse of the structures. Despite these arbitrary restrictions, experts, developers, and non-for-profit entities with an interest in historic preservation assembled a legitimate proposal to reuse the property for a "Chicago Collaborative Archive Center".</p> <p>As stated above, the DEIS is founded on a false trichotomy. Instead, a legitimate EIS should evaluate four alternatives:</p> <ol style="list-style-type: none"> 1. Harden the Dirksen Courthouse against terrorism 2. Make the properties available for adaptive reuse (with specific security outcomes, not limitations to occupancies that stifle legitimate marketable reuse.) 3. Demolition 4. Do nothing other than maintain the buildings

Method of Commenting	Commenter Name	Affiliation	Date Received	Comment/Inquiry
Online Comment Form	Lee Brown, FAICP (continued)		10/12/2023	<p>Census data shows that since the year 2000, Chicago's central business district has had the largest population growth within the CBD of the 10 largest US cities. This is an astounding 213% increase. I contributed to that increase when I purchased a home and moved to within 900 ft of the Dirksen Courthouse and the subject properties. I walk past the site regularly on my way to shop and pickup groceries in the South Loop. The daytime population of the CBD has changed over the last 5 years, first by the increasing resident population, followed by the exodus of office workers to their suburban work-from-home offices during the pandemic, and after the peak of the pandemic the return of tourism. Hotels, parking structures, and Chicago Architecture Foundation walking tours are fully occupied as a direct result of cultural tourism. It is rare now not to encounter a walking tour within the historic districts or in front of an historic building. GSA's proposal to demolish the subject property would contribute to the loss of cultural and architectural history that draws in tourism revenue, and would diminish the sense of vitality within the State Street corridor. GSA's callous disregard for alternatives that meet both the needs of public and courthouse safety and the importance of historic preservation and cultural resources makes a mockery of both NEPA and the National Historic Preservation Act.</p>
Online Comment Form	Anonymous		10/13/2023	<p>As President of the Chicago Chapter of the Society of Architectural Historians, I am urging you to save the State Street buildings.</p>



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

202, 214, 220 S State Street

Gregory B [REDACTED]
To: statestreet@gsa.gov

Tue, Sep 12, 2023 at 12:23 AM

Please perform Viable Adaptive Reuse of the buildings. Thank you.

Gregory Brackens
[REDACTED]

Sent from my Galaxy



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

202 214 220 S State St

1 message

'Christian Moevs' via State Street North Site <statestreet@gsa.gov>

Thu, Sep 14, 2023 at 10:03 AM

Reply-To: Christian Moevs [REDACTED]

To: statestreet@gsa.gov

Gentle GSA,

These buildings should not be torn down.

1. Downtown retail areas are always vulnerable, and S State St is currently especially vulnerable. Tearing these down will be another step toward the desert blight of so many "urban renewal" projects, that gutted downtowns into "open spaces" and parking lots. Just as the vacant buildings now have been a blight on several blocks, depressing that entire area of S State, which is now almost all vacancies, tearing them down will end up having the same effect. It will interrupt a retail corridor, stop foot traffic, depress surrounding retail, and become another open space for loitering and drugs (like the open space north of Harold Washington Library, just a couple blocks south).

2. Historic / aesthetic considerations are real: they are the anchor upon which downtowns revitalize. When you destroy that, and try to replace it with utilitarian structures or nothing, the area is doomed. When you preserve the continuity, history, beauty, of the original buildings, the area can always be reclaimed. The contrast between South Bend (despite Mayor Pete's best efforts) and Goshen Indiana (which has replaced South Bend as the vibrant downtown attraction in the whole area), is quite a lesson. Goshen has all its original historic buildings; South Bend tore down or replaced many of theirs for urban renewal in the 70s.

3. The security issues are of course exaggerated. You cannot blight the downtown of Chicago for every hypothetical imagining: they are endless. Just seal the back walls of those buildings. You'll continue to own them, so you can control them. The courthouse is surrounded by buildings: it is in the center of Chicago. If the fears were real, the courthouse should not have been put there. Now that it is there, you cannot sacrifice the downtown of one of America's greatest cities for it.

Warmest wishes,
Christian Moevs

[REDACTED]

[REDACTED]



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Advocating for Adaptive Reuse of 202, 214, and 220 South State Street Buildings

1 message

Daniel Turton [REDACTED]
To: statestreet@gsa.gov
Cc: Daniel Turton [REDACTED]

Thu, Sep 14, 2023 at 4:50 PM

Dear Mr. Mulligan,

I hope this message finds you well. I would like to express my strong support for Alternative B: Viable Adaptive Reuse of the buildings located at 202, 214, and 220 South State Street in Chicago, Illinois.

Adaptive reuse represents a sustainable and forward-thinking approach to urban development. It not only preserves the cultural and historical significance of a community's built environment but also promotes economic vitality and minimizes environmental impact. By repurposing existing structures, we reduce the need for new construction and the associated resource consumption.

Furthermore, adaptive reuse encourages creativity and innovation in design and function. It allows for the integration of modern amenities and technologies while maintaining the unique character and charm of the original architecture. This approach fosters a sense of continuity and connection to our shared heritage.

In the case of 202, 214, and [220 South State Street](#), these buildings hold a rich history that is woven into the fabric of Chicago. Preserving them through adaptive reuse would not only benefit the community but also serve as a testament to the city's commitment to sustainability and cultural preservation.

I wholeheartedly encourage the General Services Administration to give serious consideration to Alternative B. I believe it aligns with the long-term interests and aspirations of the Chicago community, fostering a vibrant and thriving urban environment for generations to come.

Thank you for your attention to this matter, and I look forward to a future where these historic buildings continue to play a meaningful role in the life of the city.

Warm regards,

Daniel Turton
Project Manager, Northwestern Medicine
[REDACTED]



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

202, 214, and 220 South State Street

Annika Donnen [REDACTED]
To: statestreet@gsa.gov

Sun, Sep 17, 2023 at 5:31 PM

Dear Joe Mulligan,

I'm writing in support of the adaptive reuse option for the buildings at 202, 214, and 220 South State Street. As a relatively new Chicagoan (and someone who works in the Loop), I value our historic architecture and the sense of place that is unique to this city. However, an even greater concern for me is the environmental impact of demolition and new construction.

Many thanks for your time,
Annika Donnen
Associate Librarian, Lyric Opera of Chicago



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Century and Consumers Buildings - Alternative B Requested - Viable Adaptive Reuse

1 message

Kathryn Totaro [REDACTED]
To: "statestreet@gsa.gov" <statestreet@gsa.gov>

Thu, Sep 21, 2023 at 3:01 PM

Re: Century and Consumers Buildings in Chicago Illinois

To Whom It May Concern:

As a citizen of Chicago, I ask you to select "Alternative B Viable Adaptive Reuse" of these buildings. You wanted to know the environmental impacts of your alternatives - recycle, reuse and repurpose is best for all, I believe.

Historic preservation, historic conservation - using what we already have is the healthier for the environment vs demo. It will also keep "Chicago" in the forefront of honoring its past while planning for the future. Best of both worlds.

Kathryn Totaro
[REDACTED]
[REDACTED]
[REDACTED]

On Mon, Sep 25, 2023 at 12:27 PM Laura Lavernia <llavernia@achp.gov> wrote:

Greetings Joseph,

Just confirming that GSA is not substituting NEPA for Section 106 but integrating the two (NEPA and Section 106). This is my understanding, but we just wanted to take a second to confirm.

Thank you in advance for your reply,

Laura Lavernia
Program Analyst / GSA Liaison
Advisory Council on Historic Preservation

[Redacted signature block]



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Landmarks Illinois Comments on Assessment of Effects

1 message

Kendra Parzen [REDACTED] Wed, Sep 27, 2023 at 2:52 PM

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

Cc: Frank Butterfield [REDACTED], Betsy Merritt

[REDACTED], Christopher Cody [REDACTED], Jennifer Sandy [REDACTED],

Ward Miller [REDACTED], [REDACTED],

Brad White [REDACTED], "Rubano, Anthony" [REDACTED], "Wallace, Carol"

[REDACTED], Dijana Cuvalo [REDACTED], Kandalyn Hahn

[REDACTED]

To the GSA State Street Team:

Landmarks Illinois appreciates the opportunity to review the Architectural Resources Survey Report and Assessment of Effects to Historic Properties for the State Street undertaking. Having done so, we object to the finding that Alternative C, no action, will have no adverse effect on the Century and Consumers Buildings and 214 S. State Street.

The assertion that no action would have no adverse effect relies on a presumption that the status quo is not detrimental to the building. This is not the case here. To date, GSA's available funding and actions have been insufficient to the maintenance needs of the building, and instead have been at best reactionary to a declining state of affairs. GSA will continue to have limited federal funds available for maintenance and repairs. Thus, it is reasonable to expect that the status quo – no action – will result in the continued deterioration of these buildings.

In most cases, it is correct that a no action alternative would result in no adverse effect. This is based on an assumption that the building in question has a baseline functionality that will remain if no action is taken. This is not the case for Century and Consumers Buildings and 214 S. State Street. With no action, we can reasonably expect these buildings to deteriorate toward a condition in which they are beyond repair.

We recognize that Alternative C is couched as the no action alternative, and that the GSA and its consultants may be considering its effects outside the scope of this undertaking. However, in this instance, we find that to be a line of separation without meaning or applicability. For these buildings, a lack of action is an affirmative choice to pursue neglect leading to deterioration. Thus, we believe that Alternative C: No Action, should be categorized as having an adverse effect.

Thank you for considering our comments.

Sincerely,

Kendra Parzen

Advocacy Manager

Landmarks Illinois



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Public Comments for Century & Consumers Buildings

1 message

Brian Hodapp [REDACTED]
To: StateStreet@gsa.gov

Mon, Oct 2, 2023 at 4:03 PM

Hello, I am a long-time resident of Chicago, and I am passionate about protecting the architectural legacy of the city.

The public and I have come out broadly in defense of the Century & Consumers Buildings' historic character, which contributes to the National Register of Historic Places Loop Retail Historic District.

There are a range of reasons not to demolish these buildings. Postwar urban renewal gutted viable commercial corridors and destroyed neighborhoods. Today, South State Street already has dozens of retail vacancies because of pandemic-era closures. Demolition of the Century & Consumers Building would be bad for business: it would create a void on Chicago's most iconic thoroughfares.

The demolition is also bad for the planet. Postwar urban renewal consigned whole neighborhoods to the trash heap, wasting resources and energy. Sending millions more pounds of the Century & Consumer Buildings' terra cotta, brick, glass and metal into an area landfill would be anti-environment.

It's been contended that the Century & Consumers Buildings "have been vacant and unused for years and have fallen into serious disrepair." Make no

mistake — this disrepair is the direct result of the GSA's lack of maintenance and care for the buildings, and not a reason for their demolition.

Meanwhile, the GSA has expertly maintained the Dirksen Federal Building, replacing the exterior curtain wall in 2006 and repainting the complex with black paint. The General Services Administration owns an inventory of almost 500 historic buildings, spanning over 200 years of American architectural history. Each of these buildings demands that GSA consider design, security and planning surrounding the buildings in concert with the areas surrounding them.

It has been argued that the Century & Consumers Buildings are too close to the Dirksen, and that no plan put forth for private redevelopment has addressed the security risk. Yet the Dirksen is within a dense urban core, adjacent to numerous buildings, including [131 S. Dearborn St.](#) and the Monadnock Building at [53 W. Jackson Blvd.](#) How can proximity to these buildings be considered safe and others not?

Urban renewal is widely agreed to have been a mistake with devastating consequences that reinforced segregation, increased dependency on the automobile, and wiped whole neighborhoods off the map. Let's not repeat any of these mistakes.

If GSA claims that the Dirksen Courthouse is at risk, then the GSA should have the expertise and resources to mitigate that risk not by devastating a

neighborhood, but by reassessing the safety of the courthouse and seeking a safe private redevelopment plan for the Century & Consumers Buildings.

This an approach that is completely feasible and cost-effective for the GSA, and preserves the vibrant, dense, commercial core of the city the Dirksen building serves. Sen. Durbin, work to make this, not a gravel pit in the heart of the Loop, your legacy.

Respectfully Submitted,

Brian Hodapp



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Do Not Demolish the Century and Consumers Buildings!

1 message

Alex Bear [REDACTED]
To: statestreet@gsa.gov

Tue, Oct 3, 2023 at 9:09 PM

The proposed demolition should not even be under discussion! The Federal government should be the best of neighbors and partners in downtown Chicago, not an absentee landlord wielding a wrecking ball on grounds somewhere between specious and contemptible.

Work with the city and local groups on their proposals for restoration and reuse, which can be easily accomplished while still protecting the people who work at the Dirksen Courthouse.



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Do not demolish!

1 message

Tom Bellino [REDACTED]
To: statestreet@gsa.gov

Wed, Oct 4, 2023 at 3:32 PM

Hello,

I, in addition to all Chicagoans, am immensely proud of the architectural heritage of our great city. The buildings on State Street that the GSA is considering demolishing are an integral part of that legacy. Chicago is the nation's third largest city and, in many ways, is the architectural capital of not just the US, but the world. It would be unconscionable that the federal government might deem our city's proudest feature to be a worthless inconvenience to one powerful person's idea of safety that flies in the face of all logic, reason, and, most importantly, the recent history of the buildings coexisting just fine.

Please do not destroy our city's cultural legacy under any circumstances.

Thank you,
Tom Bellino



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Public Comment on 202, 214, and 220 State Street Project

1 message

Patrick Grimaldi [REDACTED]
To: statestreet@gsa.gov

Wed, Oct 4, 2023 at 7:54 AM

Dear General Services Administration,

I am strongly in favor of saving these landmark buildings on Chicago's State Street. I've admired them both as a pedestrian when I'm walking by, and while I worked in the Dirksen building. These buildings should be restored and reused instead of being demolished.

Best,

Patrick Grimaldi



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Don't Demolish the Century and Consumers Buildings

1 message

Jennifer Ketay Brock [REDACTED]

Fri, Oct 6, 2023 at 11:04 AM

To: statestreet@gsa.gov

Dear General Services Administration,

Today, I, born and raised in Chicago, write to ask you not to demolish Chicago's Century and Consumers Buildings.

As two iconic early skyscrapers in downtown Chicago's historic district, the Century and Consumers Buildings contribute to the architectural significance of the Loop. Architecture firms Jenney, Mundie & Jensen designed the Consumers Building in 1913, and Holabird & Roche designed the Century Building in 1915.

As you continue federally mandated reviews to weigh options for the Century and Consumers Buildings, I ask that you work with all parties to identify a preservation-based reuse that also meets security needs in order to avoid these places' wasteful demolition.

Thank you.

Jennifer Ketay Brock,
[REDACTED]



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

202, 214, 220 S State St Draft EIS Comments

1 message

Thomas Weber [REDACTED]
To: statestreet@gsa.gov

Fri, Oct 6, 2023 at 4:06 PM

Hello,

I am writing as part of the Draft EIS process to advocate on behalf of the Century and Consumers buildings. My strong advocacy for Alternative B: Viable Adaptive Reuse is due to:

1. The city of Chicago and the Federal Government failed to be good partners during the CA Ventures residential proposal for the buildings several years ago, and the same mistakes should not be repeated with viable reuse proposals such as the Chicago Collaborative Archive's Center.
2. The current disrepair of the buildings is noted as a reason for demolition, despite the fact that the disrepair and abandonment is due to several decades of purposeful inaction following the Federal Government eminent domain takeover.
3. Instead of working to acquire real estate for unnecessary security buffer zones, the Federal Government should increase efforts on renovating their buildings to help resolve security concerns through increased window opacity and glass strength if they wish to maintain a presence in dense downtown areas.
4. Both skyscrapers are architecturally significant to State Street and the Chicago Loop. As a society we should apply lessons learned from architectural and urban planning mistakes in the past half century instead of repeating them in the future.
5. As large cities like Chicago cement the future of their downtowns in a post-pandemic world, the Federal government needs to be a partner advocating for innovation and reuse instead of demolition that hurts overall density, street life, and economic recovery. Both buildings were active with commercial and retail tenants prior to being purposefully shuttered, and that unnecessary action has cast a dead zone over this part of State Street in the years since.
6. There are already an abundant number of underutilized public plazas within walking distance of this site such as Pritzker Park, Federal Plaza, Chase Plaza, and Daley Plaza. There is no benefit to the Chicago Loop by having historically significant buildings destroyed to create yet another plaza.

I hope common sense prevails and Alternative B: Viable Adaptive Reuse is put into action for the Century and Consumers buildings.

Tom Weber
[REDACTED]



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Safety of State Street Buildings

1 message

Conor McNamara [REDACTED]
To: StateStreet@gsa.gov

Sun, Oct 8, 2023 at 9:30 AM

Do you all think we are fucking morons? The two buldings on state provide 0 security risk. Put up curtains if the danger is that high. This is insulting. DO NOT TEAR DOWN THE BUILDINGS



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Century & Consumers Buildings

1 message

Jake Swenson [REDACTED]
To: statestreet@gsa.gov

Mon, Oct 30, 2023 at 10:14 AM

Good Morning,

I sent a lengthy letter during the last round of comments, so I'll keep this brief. I just want to reiterate my support for adaptive reuse of the Century and Consumers buildings.

Sincerely,

Jake Swenson
[REDACTED]



CCAC
Chicago Collaborative
Archive Center



Our Lady of Guadalupe
Provincial Archives and Library

The unified Order of Friars Minor province
from six U.S. legacy provinces with archives
from the following cities:
- Albuquerque, NM
- Burlington, WI
- Butler, NJ
- Cincinnati, OH
- St. Louis, MO
- Santa Barbara, CA
Interim Director: Rita Martin -- Email: bmartin@friars.us



October 31, 2023

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

statestreet@gsa.gov

RE: Comments on the Draft Environmental Impact Statement for the Century & Consumers
Buildings, 202, 214 & 220 South State Street, Chicago

Dear Mr. Mulligan:

Thank you for this opportunity to share our comments on the Draft EIS, which was shared with the public through the Section 106 process on September 11, 2023. The Section 106 process to date has been extraordinarily disappointing and flawed from our perspective. With that said, we are hopeful that together we can all find a solution to retain two significant buildings – The Century and Consumers Buildings, located at 202 and 220 S. State Street – which are a part of Chicago’s extraordinary architecture and history, while ensuring the safety of both employees and visitors to the Chicago Federal Center and Dirksen Courthouse.

As we work through this particular Federal Section 106 process, we encourage the GSA to return with us to the early days of the establishment of the historic preservation movement. In a forward to the 1966 document *With Heritage So Rich: A Report of a Special Committee of the United States Conference of Mayors*, former First Lady Lady Bird Johnson wrote:

As the report emphasizes, in its best sense preservation does not mean merely the setting aside of thousands of buildings as museum pieces. It means retaining the culturally valuable structures as useful objects: A home in which human beings live, a building in the service of some commercial or community purpose. Such preservation insures structural integrity, relates the preserved object to the life of the people around it, and not least, it makes preservation a source of positive financial gain rather than another expense.

It may appear unusual to quote First Lady Johnson in 1966 to further a point about advancements in the field of preservation that have come so far, and increasingly fast in the last 20 years. However, it is the very foundation of the formal historic preservation legislation in America that challenges us to continue being more inclusive, more holistic, more complete and comprehensive in our analysis of what these historic buildings mean to Chicago and the world. Also, how we can preserve these structures and continue to ensure every responsible decision is made to protect the health and safety of the Chicago Federal Center and Dirksen Courthouse employees and visitors. We could continue what has become the traditional Section 106 process, or we could move toward one that reflects the very spirit of the document which shaped the historic preservation movement today. We hope we can all agree to strive

for a different approach to the two seminal and historic structures currently threatened with demolition. Hopefully we can create a new approach that can be a model for the GSA going forward with all of its building inventory decisions and reviews.

The issues raised below are numerous – 96 to be exact. We can summarize them into the following categories:

- Crisis reduction. In a time when our nation is facing an affordable housing crisis, an environmental crisis, and a cultural crisis, forging ahead with a demolition of buildings that would contribute to worsening these crises and missing opportunities to reduce the impact by adaptively reusing the Century & Consumers buildings instead of throwing them in the trash.
- Best practice in historic preservation. The GSA throughout this report demonstrates a reliance on outdated historic preservation standards. Now is as good a time as any to do something about that. We know better now, and we can do better.
- Cannot see the forest for the trees. Focused on what is immediately in front of view and not at a higher view.
- No community goals being met. No long-term community goals are being served by the demolition of the historic structures that cannot be served by less destructive methods. No City plans, no Chicago Loop Alliance plans, no community plans, and no historic preservation plans. Everyone agrees security is essential, but the response must be more nuanced than this.
- Collaboration. GSA would benefit from reimagining what a collaborative, inclusive, transparent, and engaging Section 106 process could be like. We have top experts in the nation ready to lend our support and expertise. Welcome us as partners, and let us see where that can take us.

We compiled our list of both questions and concerns in the order in which they appear in the EIS document.

1. Minor to moderate: Throughout this report, there are moments where “minor to moderate” is used as a response to the impact. It is long past time to modify this into at least two separate categories. When considering impacts, there is a substantial difference between minor and moderate. We can measure these things in a more nuanced and enlightened way.
2. ES.2. We will reiterate this point every time we communicate on this issue, so it is a good place to start. When does the federal government intend to acquire all the other properties similarly sited from the courthouse and schedule their demolition? It will require a great deal of money, but in the name of security it seems like the right thing to do. If that is not happening, then why are we still here grappling over what is essential to protect judges, employees, and visitors? Either demolition is the only way, or demolition is the only way the GSA cares to deal with these surplus properties.
3. ES.2. Another reminder that a simple solution is to add to the language in the 2022 appropriation to include “restoration” as a use of the federal funds. If that cannot occur or as an act of Congress, pass on those remaining funds, and seek proper funding in another budget year. It seems reasonable that the existing appropriated funding could be used to demolish obsolete interior non-historic partitions and features, exterior fire escapes and systems, while additional funds – both private and public – could be pursued for the rest of the restoration.

4. ES.2. As has been previously covered, the GSA can reduce its real estate footprint in this situation by leasing the buildings to a private, preservation-focused developer who will reactivate, restore and re-envision these iconic buildings as a great source of new institutions and amenities of commerce.
5. ES4.1. There is mention of reorienting the Dirksen Federal Courthouse entrance to the east side of the building, in order to provide meeting places and media gathering places for visitors to the courthouse. How much of a motivation is that plan in this course toward demolition? There is a Mies van der Rohe designed plaza which already exists for this function at the west end of Quincy Court, adjoining the east side of the Dirksen Courthouse Building, currently used as a truck and service dock and for parking of vehicles. In addition, the large Federal Center Plaza is located directly across the street from the courthouse on Dearborn that can easily accommodate additional visitors and media. A second federally owned plaza built just east of the courthouse seems excessive by reasonable standards.
6. ES4.2. The 15 criteria for redevelopment. This list is as long as it is arbitrary. It seems intended to prevent a viable reuse and facilitate a swift demolition. Unfortunately, this Section 106 process affords us exactly the opportunity to point to discrepancies, spotlight flaws, and collaborate on a final plan for a federally owned, internationally significant historic high rises in downtown Chicago. That is what we are doing here. We will continue to do so at every opportunity. This list can be significantly shortened with or without a hardening of the courthouse windows and walls, but it could possibly be eliminated with the hardening of the courthouse windows. In the name of security, we would help the GSA advocate to Congress to utilize these funds to protect the lives of judges, employees, and visitors by hardening the walls of the courthouse itself. It also must be noted that if 202 through 220 are demolished, it is providing clear sight lines from the buildings across S. State Street into the federal courthouse. Again, unless GSA has immediate plans to acquire and demolish every other building nearby, we can talk honestly about how convincing the security at all costs argument is.
7. ES4.2. Criteria for development. No vehicular access on Quincy Court (#4) or on the properties (#5 loading and #7 parking) themselves. It must be noted that the garage for delivery for 220 is on Quincy Court. For removal of debris or delivery related to renovations, this would be highly beneficial. Concerning loading and/or parking, having gated and covered loading docks are much safer than from the street and across public sidewalks. This is well-documented and part of high value loan agreements related to the movement collections. The GSA could easily consult with the National Gallery or Smithsonian related to this. Or security could consider what protocol they follow with respect to movement of prisoners or high value federal persons. It is not across a public sidewalk. It is done securely behind gates at minimum but best behind appropriate doors, out of the elements, and in a secure setting. This similar protocol is for the movement of art and archives. Also noting a hardening of the courthouse building, it seems viable to allow scheduled deliveries to the site as is currently allowed at the Berghoff Restaurant.
8. ES4.2. Criteria for development. Residential housing should be an allowable use on these sites. Perhaps housing for federal employees where the tenants have the background check clearance to live in the housing.

9. Table ES-1. It is difficult to consider that demolishing two historically and culturally significant skyscrapers would have a negative, minor, short-term impact on the surrounding historic sites. When you consider a can of standards that we've been updating over the decades but is still a work in progress and forever (hopefully evolving), how can we consider one part of the community without considering the whole of the community? When you remove pieces of the history of Chicago, the story has to be rewritten. We seek to keep all the pieces intact we can so we do not have to tell stories of our history through the use of pictures and headstones. Whether it is for "Cultural Resources" or for "Aesthetic & Visual Resources", demolition would be significant with long-term impacts. Demolition by nature is significant and permanently changes the visual understanding of a street and erases the historical context for which the street was created and intended. The visual, esthetic, and cultural resources that created the build environment for which the architect, Ludwig Mies van der Rohe, used in designing the federal courthouse. Demolition of 202-220 removes the architect's intent. That is significant and permanent... long-term impact.
10. Table ES-1. Under socioeconomic and environmental justice consideration, it is suggested in this table that the impact of demolishing the historic buildings at 202, 214, and 220 South State Street would be minor on heritage tourism and environmental justice. It is noted further in this report that since the GSA cannot quantify specifically how many heritage tourists come to Chicago just to see the Century & Consumers Buildings, it cannot be adequately considered. Our discipline of historic preservation teaches us that the more pieces of a story we have intact, the better we can tell the story. If there is a single house on a street that was once lined with similarly designed or period houses, it is difficult to talk about the glorious street when only one is left. It is uncertain how many more demolitions it will take to permanently destroy heritage tourism in Chicago, but every bite bleeds and leaves a scar. On the environment, in what overburdened landfill will the remnants of three historic buildings be laid to rest after a demolition? Is that landfill in an environmentally burdened community? Is its life expectancy growing shorter by the year as leaders and developers choose convenience over almost everything else? There is nothing convenient about the choices the GSA has to make here, but demolition is certainly the easiest of the three. Good thing we are not a city who always responds favorably to doing things the easy way.
11. Table ES-1. Can the GSA provide data showing how the greenhouse gas emissions impact will be the same for demolition as it will be for adaptive reuse? In every other legitimate greenhouse gas emission analysis I have worked on, there is a significantly higher impact from demolition. We look forward to seeing GSA data to back up this suggestion, otherwise we think the impact from demolition should be upgraded to significant.
12. Table ES-2. This table suggests that the hazardous material impact will be the same for demolition and adaptive reuse. Surely there are ways to stabilize or enclose hazardous materials in an adaptive reuse that would make the cumulative impact less severe than demolition. Can we see some data to back this up? Otherwise, again, let's upgrade the demolition impact to more severe than adaptive reuse.
13. Table ES-1. It is suggested in this table that the health and safety of no action in this matter is far worse than demolition, which sounds like a case for demolition. It is important to note everywhere it comes up that the building is in this condition because the GSA cannot commit

the resources toward its proper care and maintenance. To then suggest that demolition is the better option from a health and safety perspective is a frustrating circle to be in. Can we clarify here what is really going on and evaluate it for what it is? Historically significant buildings that can be viably repurposed and cared for in a manner that is better for the block, the neighborhood, and the City of Chicago.

14. ES.7. In the consideration of cumulative impacts, there is no discussion of the cumulative economic impact of demolishing two historic skyscrapers near the heart of downtown Chicago, in the loop, known historically for commercial business. Also, please help us understand how the cumulative aesthetic and visual impact of demolition would be only minor to moderate? Otherwise, bump up that assessment to significant and negative impact. Please substantiate the claim that demolishing buildings that could house people or businesses full of workers would have a beneficial impact on nearby community facilities. That runs counter to logic and reasoning. This should be adjusted to moderately significant negative impact.
15. ES.8. Public engagement. It has not been adequately answered to date by the GSA, so we will ask it again. Why is the GSA prioritizing demolition over adaptive reuse that meets its security criteria by some combination of adaptations to the State Street properties but a focus on the hardening of the federal courthouse instead? We will keep asking it until an answer is presented that stands up to reason, logic, and data.
16. Table ES-3. Public engagement. ES.7. This does not address the cumulative economic impact of demolition, but Table ES-3 notes that the public has already expressed concern about the economic impact of demolition. Please help us work more effectively through this process by addressing the legitimate concerns we are collectively bringing before you at every step of this process. Transparency is important. So is seeing our hard work show up in updated versions of documents throughout this process. We should be working as a team on these solutions, but more often than not it appears that the Consulting Parties are not being heard in this process and the responsiveness from the GSA is severely lacking.
17. ES.10. Please update the estimate that this Section 106 process will wrap up by the end of 2023. This would be an opportunity to further discuss and communicate as a team, including the Consulting Parties, regarding a realistic timeline to get through this process. Is there a particular reason the GSA appears to want to move this along quickly?
18. 1.1. Please explain in this document, in writing, why the other adjacent and nearby skyscrapers are not also considered a significant threat to the security of the federal courthouse staff and visitors. We cannot continue to say it is confidential for security reasons and end the discussion. It does not make any logical sense. We should be able to discuss this collaboratively. We will continue to ask this question at every turn until it gets answered to our satisfaction. It sets a dangerous and national precedent for other GSA properties across the United States.
19. 1.2.1. Please update this graphic showing the adjacent buildings on the northeast corner of Dearborn and Adams and the northwest corner of Dearborn and Adams, which are either also a major security threat or this demolition alternative for the subject properties is the easy way out for the GSA. The eastern side of South State Street should also be considered for its security threat if demolition occurs – with demolition resulting in increased sight lines to the Dirksen Federal Courthouse and the larger Chicago Federal Center Complex.

20. 1.2.2. We would request copies of all the studies and reports on reuse, restoration, maintenance, building condition, and important historic features of the buildings that the GSA has developed or contributed to during its ownership of the subject properties. We would also request copies of all the documents listed in this section, as well as any others that may be discovered by the GSA in the course of its work on this matter and relating to the Century and Consumers Buildings. These reports would be useful in understanding perceptions of feasibility and marketability. In the spirit of collaboration, it would be helpful if all members of this process have access to the same information – excluding specific security details.
21. 1.3. While we understand the intention of the GSA's actions to improve security around the Dirksen Federal Courthouse, this section reads as though demolition is the only means to achieve these goals. Can this language in this Draft EIS document, and the GSA documents, be changed to consider security solutions that do not result in the loss of important parts of Chicago's whole skyscraper history? When will we have reached the point where the last early steel-frame Chicago skyscraper is lost to demolition, which also destroys the final integrity of our built environment history? Do we have to keep demolishing important historic skyscraper buildings until we realize we are too late? When is that breaking point?
22. 1.3. The GSA is not applying its action to all of the tall buildings around the federal courthouse – just the subject properties, which fall under the ownership of the GSA. We would like a formal statement in response to this question that we have been asking from our first initial meetings.
23. 1.3.1. “The ability of the federal government to retrofit the Dirksen Courthouse with countermeasures to address known security needs would be infeasible from both a construction and cost consideration standpoint.” Have we collectively and completely worked through those costs compared to the budgeted cost to demolish, which may in fact be far short of the actual cost of demolition? We had substantive and seemingly viable conversations at the first charrette which was received as most promising by the participants who voiced an opinion. It seems reasonable to continue talking through what this could look like, what it would cost, priority zones to be hardened first. We ask the GSA to commission an expert to develop an estimate and scope and estimate in 2023-24 dollars. We can take the conversation from there.
24. 1.3.1. Please share a summary of the GSA analysis on sightlines from the properties on the west side of the 200 block of South State Street to the Dirksen Federal Courthouse. if the subject properties at 202 and 220 S. State Street are demolished.
25. 1.3.3. We politely disagree with what appears to be an assertion that this demolition strategy is driven by a presidential directive to reduce the federal footprint. We encourage the GSA to offer up these properties to a preservation-sensitive developer and invest in reconfiguring its building and complex, to meet its security needs. Adaptive reuse of the subject properties would be expected to support these same needs.
26. 1.3.3. The GSA notes that it spends \$70,000 a year on scaffolding rentals and \$750,000 every two years for façade improvements. We accept that it is an incredible burden on the GSA, and we encourage the GSA to work with us to have these buildings adaptively restored by a private developer. That burden on the GSA is nowhere near what the buildings require, as witnessed by the current building condition assessments.

27. 2.1.1. The demolition process as outlined makes no mention of evaluating, documenting, or salvaging any historic elements prior to demolition. We would encourage that language to be further detailed and as specific as possible in the EIS. This documentation process should also seek the highest level of HABS documentation, noting the significance of the Century and Consumers Buildings, designed by several of Chicago's most esteemed and world renowned architects—Holabird & Roche, and Jenny, Mundie and Jensen.
28. 2.1.2. As we will continue to point out, this list of prohibited uses appears to exceed the logical and clear security needs for the federal courthouse. We challenge this list, particularly its prohibition of residential or lodging, lack of access to Quincy Court even at restricted times, no sightlines to the courthouse (unnecessary with courthouse hardening), and no parking on site at any time. How are these criteria enforced or even considered at the Marquette Building and the Citadel Center? The Citadel was completed post-9/11, and it would seem reasonable that security on a building adjacent to a federal courthouse would require additional consideration.
29. 2.2. In the discussion of the “no action” option, it is essential to include the reality of the current situation. We have seen the cumulative impact of 18 years of the federal government's management of these buildings, and the devastation of that impact needs to be clearly articulated in this document. What complete mothballing and maintenance would be needed to keep these buildings in at least their current condition? What would it require to get the buildings back to their 2005 condition? Does the federal government have any responsibility to maintain its assets to some minimum standards? If those standards are not currently being met or achieved, the federal government should transfer them immediately to an owner/developer who can handle that responsibility.
30. 2.3.2. In the consideration of relocating the federal courthouse to a space that eliminated almost all of the extraneous security risks associated with being in a high-density urban center, can we discuss further what those costs could be? It appears that we are being asked to go with the lowest and cheapest option, due to the potential associated costs – not because it is in the best and most balanced interest of the parties involved in this conversation. The language in this document puts a great deal of weight on costs as a factor in these decisions. While a fiscally responsible decision is the expectation from all levels of our government, we have to ensure it is balanced against the many, nuanced community considerations as part of the greater collective decision-making process.
31. 2.3.3. Things have changed considerably since the studies on this course of action were completed. At the first charrette, consulting parties reviewed analysis on currently underutilized federal spaces and potential consolidation into the subject properties. From a preliminary review, this seems like an option that should continue to be vetted with equal rigor as potential demolition plans for the two historic structures. This would help the GSA comply with a reduction in the footprint mandates as well.
32. 2.3.5. Not the most critical issue here, but it is not essential that the federal government maintain ownership of the subject properties. The federal government does not own the Marquette Building or the Citadel. We will continue to raise this issue throughout the report, and raise objections to the 15 prohibited uses. The main barrier to the federal government selling this property is its extraneous prohibited uses list in the name of security.

33. 2.3.6. This failed adaptive reuse is an example of how untenable the GSA's security requirements are for reuse. A further "hardening" of the Dirksen Federal Courthouse, with ballistic glass and other implements, and the security list becomes significantly shortened.
34. 3.1.1.1. The security threats argument to support this proposed action is difficult to assess. When we request additional information, we are told we cannot have it—or that information cannot be supplied, as it's a security risk to share that information. When we share models of what has worked in other places as alternatives to demolition, the conversation and case keeps returning to demolition as the only viable alternative. Real world experience in this realm of work tells us differently. We have remarkable and collective experiences and examples of reuse options that can lead us to viable solutions to the challenges of reusing the subject properties.
35. 3.1.1.3. It is alarming to see language in this section indicating that the federal government will only act upon the decisions made in this 106 process, not intending to respect the outcome of a Chicago Landmark designation prohibiting demolition. This language could be seen as steering the process and even challenging the City of Chicago to step back. We would like to see this language reconsidered. Can we talk about the balance of power in the republic to which we all stand? The federal government should be working collaboratively with state, county, township, and city governments, where they have to find solutions that work for everyone. Subject matter experts, not funded by the GSA, should be respected for their contributions to a reasonable resolution. Landmarking these subject properties is not a ploy to win. It is a legitimate tool to ensure that whoever owns these buildings (unless they are an active house of worship), can have their property Landmarked without their consent. Even if a property owner does not consent to a Chicago Landmark designation, they still have to comply with the Chicago Landmark Ordinance requirements and honor the laws of the City of Chicago. Those same principals should be honored with the Century and Consumers Buildings, which are part of the architectural legacy of Chicago and the nation. It is our opinion that the federal government should be respectful of such important laws and designations, and not try to supersede such laws and determinations.
36. 3.1.1.3. Further in this section, in the discussion of the Loop Retail Historic District, we appreciate the GSA including 214 as contributing to this District for the sake of this undertaking. Because we are collectively evolving in our awareness of historic preservation, we understand that even poor-quality and remodeled façade makeovers can be reversed, with a building's principal, original elevations restored. It is with that growing awareness of what historic preservation can accomplish for communities that we embrace opportunities like this example, to use it as a tool and to reevaluate conditions that may not be visible below these various remodellings, covering a historic structure.
37. 3.1.1.3. In the discussion of the Chicago Federal Center Complex, this is the first mention of Alexander Calder's Flamingo—a very seminal work of art. We ask that his name and the date of its creation, installation and dedication, all be mentioned here. It is mentioned later in the document, but it should be also inserted here.
38. 3.1.2. The GSA notes in this section that the transfer of the property from a federal entity to a non-federal entity is deemed an adverse effect. We challenge that presumption. Most of the

thriving buildings in the surrounding areas are non-federal and appear to be doing much better than the subject property in their management. The language here needs to be reconsidered.

39. 3.1.2. We would like the Illinois State Historic Preservation Office to issue an updated letter of determination as to whether this property ranks at the local, state, or national level of significance. These buildings rise to an international level of significance, especially with a UNESCO World Heritage site nomination pending.
40. 3.1.2.1. In the discussion about the Loop Retail Historic District, the language should be changed from “could” to “will”: “Therefore, impacts to the Loop Retail Historic District would be negative, moderate, and long term under NEPA. Because of the loss of character-defining features, effect on the Loop Retail Historic District *will* have a significantly adverse under Section 106.”
41. 3.1.2.1. The Federal Center impact needs additional language noting that the Chicago Federal Center was designed by its architect, Ludwig Mies van der Rohe, very specifically in the context of its neighboring buildings, and even honoring them. The glass and visual breezeway from the Post Office and Calder’s Flamingo, through the federal courthouse, and providing the principal public access beautifully upon the sight of the subject properties. The impact of the demolition of these subject properties will be negative, *significant*, and long term. We need to look less on things individually and consider the depths of the whole architectural composition and its impact on the Loop Retail Historic District, as well as Mies van der Rohe’s Chicago Federal Center. Both are seminal works of art and architecture, recognized on the world’s stage. The loss of the Century and Consumers Buildings has the potential to be a significant public embarrassment to the GSA/federal government, as well as the City of Chicago, on a world scale.
42. 3.1.2.1. The Historic Michigan Boulevard District, the West Loop-LaSalle Street Historic District, and the South Loop Printing House Historic District impact will be negative, moderate, and long term. Again, we have to see the whole. The story of Chicago’s historic built environment is interwoven throughout its streets, regardless of what artificial boundary was agreed upon by architectural historians 10 or 40 years ago. When a significant piece of that history is erased, the whole story grieves that significant loss. We cannot minimize what demolition would mean to these particular historic districts, nearby designated Chicago Landmark buildings and the downtown as a whole.
43. 3.1.2.1. On impact to National Historic Landmarks, we need to stop saying we are measuring impacts unless we are considering the people who will miss these buildings, the stories that will have to be told without them present, the people who will never know the glory of looking down State Street at these glorious beacons, or glimpsing them through the MidCentury Modern glory that is the Chicago Federal Center. If we are not considering these tangible impacts, we are not measuring enough and hence the process and vision is flawed.
44. 3.1.2.2. Please remove the suggestion here that the adaptive reuse of the subject properties “could appreciably alter resource characteristics with some noticeable loss of integrity.” It is likely that the 106 process for the adaptive reuse will be significantly less challenging than one for its planned demolition. It will likely be a designated Chicago Landmark within a matter of months, and the GSA can be assured that Chicago will continue to honor and care for its Landmarks. We Consulting Parties are not going anywhere. GSA must change the language of

impact from beneficial, moderate, long-term under NEPA to beneficial, significant, long-term and from some vague language about taking care to minimize impacts under NHPA to a beneficial, significant, long-term impact. 3.1.2.2. The impact to the Loop Retail Historic District would be at *least* beneficial, moderate, long-term and not minor as suggested here. Please alter that language. We would like to discuss further that it is in fact significant to revive grand historic structures and bring them back to vibrant use.

45. 3.1.2.2. Other contributing buildings in the Loop Retail Historic District would be a beneficial, *moderate*, long-term impact and not negligible as suggested here.
46. 3.1.2.2. In every instance throughout this section, the impact of restoring two significant skyscrapers is being downplayed. There is nothing negligible about restoring these buildings and bringing them into a vibrant, 21st century use that keep the history alive and the future ever bright.
47. 3.1.3. It is encouraging to read that Consulting Parties will be involved in the development of mitigation measures. We would like to suggest the following narrative here: There will be little need for mitigation measures because the buildings will be adaptively reused and restored. The hardening of the federal courthouse window installation is underway, and the downtown is alive with a beautiful balance of old and new, tall and short, public and private. We have housing balanced beside office buildings and shopping districts. We have federal buildings across from other incredible works of architecture and history.”
48. 3.2. Is it best practice to use the Federal Highway Administration standards for visual impacts? Are there better standards? Should the GSA develop its own? When was the last time the FHWA standards were updated? How extensively? It’s an ever-changing world in historic preservation. Should we argue here for the most up-to-date and nuanced standards the industry has now or needs to develop?]
49. 3.2.2.1. We understand the complexity of trying to measure the value of how long someone looks upon these historic structures, but if we are going to distinguish between the people who look at it longer (adjacent office workers) and those who may only be passing by, do we also need to consider whether a person walking can enjoy it more substantively than a person on a bicycle and more so still than someone passing in a bus or car? And how do you measure the value of the occasional person who will have “their breath taken away” for just a moment when they first cast their gaze up at the glory that is 202 and 220 South State Street?
50. 3.2.2.1. On the subject of landscaping, this section suggests that a flat, green space would be compatible with adjacent land uses because there are other flat, green spaces nearby. This does not read like an enlightened perspective on best practices in land use planning for the 21st century. Please remember that nearby Pritzker Park, also located on South State Street, is to be redeveloped with a new structure, as it is another failed “pocket park” project. One can also look at the failures of “Block 37” in Downtown Chicago, cleared of historic buildings and became “a landscaped eyesore” on State Street for more than 25 years. The best solution is to retain the Century and Consumers Buildings, and to restore their terra cotta and find a suitable reuse for these amazing buildings, which are so much a part of Chicago’s architectural legacy and historic built environment, which are unique to Chicago and only Chicago.

51. 3.2.2.1. The final assessment that demolition will have a negative, minor-to-moderate, long-term impact does not reflect reality. First, please commit to either minor or moderate, but more importantly, acknowledge that the erasure of these two beautiful skyscrapers will have a significant, long-term negative impact.
52. 3.2.2.2. The suggestion that the viable adaptive reuse of the subject properties will have no long-term impact on the visual and aesthetic resources needs to be changed. Beneficial, significant or moderate at least, and long-term.
53. 3.2.3. It continues to come back to a false narrative that there is only the option of altering or eliminating the subject properties to get to the best security outcome for the federal courthouse. We must fully vet as a community the options of alterations as well to the federal courthouse itself. This section needs to reflect that approach.
54. 3.3.1.2. Zoning. Is a vacant and landscaped lot the highest and best use for a downtown site at the corner of State Street and Adams? Parks are a great asset to communities, but there are significant parks along the Chicago Lakefront nearby, and there are wonderful pocket parks even closer. This section should not read as if a pocket park is compatible with nearby zoning. We do not need another pocket park in the name of security, not when there are viable alternatives that get us all to a place where we want to be.
55. Table 3-3-1. It could be noted in the definition of significant impact if a property goes from a skyscraper (its current zoning) to a vacant lot. It is a massive underutilization of zoning potential in areas designed for density. Demolition of these skyscrapers needs to be clearly acknowledged in this document as running counter and illogical to all local comprehensive plans.
56. 3.3.2.1. We do not agree with this assessment that demolition of historic skyscrapers for a landscaped vacant lot is what *We Will Chicago* had in mind when it was talking about expanding green space. Please alter this language to reflect reality. Further language that demolition of the subject properties “may inhibit plans to reinvigorate” State Street is an affront to sensibilities. Please adjust accordingly.
57. 3.3.2.1. Has the Chicago Loop Alliance consented to the characterizations in this section? This section could be informed by their expertise and collective works reviving downtown and restoring a vibrant play, to live, work, and play.
58. 3.3.2.2. In comparison to demolition or demolition by neglect, the retention of fully restored buildings should be noted as a beneficial, significant, long-term impact.
59. 3.3.2.3. We challenge the assertion that the continued decay of two skyscrapers in a no action alternative will have no impact on land use. Vacant and decaying is valued and impacted differently than fully restored and placed back into a community use. The Century and Consumers Buildings are essentially “*The Reliance Building-in-waiting*,” as the Reliance Building was in a much more deteriorated state and condition than the Century and Consumers Buildings. The Reliance Building’s restoration has had a profound impact on State Street, the entire Downtown area of Chicago, in addition to added recognition and tourism for our local economy and City. Imagine the preposterous notion that the Reliance Building is not significant in the history of architecture and could be demolished, as there are many similar comparisons

to the Century and Consumers Buildings. The GSA needs to acknowledge their responsibility to these structures after 18 years of ownership and plan for a sensitive rehabilitation of these historic buildings.

60. 3.4. In general, this section on community facilities is an amenities list of a marketing piece for future housing that could go into a fully restored Century and/or Consumers building.
61. 3.4.1.1. The summary of the schools in this community facilities section makes a good case for the need for housing in the immediate area. Imagine if that restriction were lifted from the prohibited used list, what the possibilities are to support and further grow these thriving community facilities.
62. 3.4.2.1. In this discussion about impacts on community facilities if the subject properties are demolished, how can it be projected that the impact will have “potential minor or moderate beneficial long-term impacts”? The elimination of future jobs, future residents, economic growth, growing heritage tourism, more users for public transit and community facilities. How does demolition of the subject properties not result in significant, long-term, *negative* impacts?
63. 3.4.2.2. And in a reverse of the previous point, how can it be determined that the revitalization of these historic skyscrapers will have no long-term impacts on community facilities? It rings of extreme lack of vision to reach the assessment in this report. We have stories across the world of the power of historic preservation to spark the revitalization of community. This report should reflect the energy of that movement.
64. 3.4.2.3. The assessment that no community facilities will be impacted by the no action alternative also smacks of outdated perspectives on planning and community. Ask anyone who lives, works, moves, plays, or visits an area in the vicinity of vacant and decaying communities if they experience that site as beneficial or negative? It is also worth noting that neighboring property value is lower next to vacant lots but increases next to positive reuse.
65. 3.4.3. This section indicates that no mitigation measures are required. How is that possible? There is nothing in this report that suggests there will be no need for mitigation.
66. 3.5.1.1. In the income discussion here, it compares income groupings for Cook County below \$25,000 and above \$150,000 but only above \$100,000 for Chicago numbers? Is it possible to compare the same numbers for both the County and Chicago? In Table 3-5-3 that follows, the income is broken out similarly, but it would be good to have the narrative reflect that apples comparison.
67. 3.5.1.4. Heritage tourism. In this conversation about the UNESCO World Heritage site, the narrative needs to reflect reality. In the course of developing the sites to include in this comprehensive process of nominating a World Heritage site, a number of choices had to be made based on current owner consent and keeping the number of nominated properties to a manageable number. That being said, there is a full expectation amongst the collaborators that if/when the nomination is accepted, there will be opportunities to add additional sites important to the evolution of the skyscraper. The Century & Consumers buildings are an essential part of that history.

68. 3.5.2.1. Downplaying the long-term impacts from the demolition of the subject properties does not serve anyone in what should be a transparent and collaborative process to find the best solutions to meet the needs of the GSA security team and the people who love the power of keeping history alive through a healthy combination of stories, pictures, and a retained built environment. It does mean that we need to do our very best to protect and steward the structures that are vitally significant and should be saved and honored.
69. 3.5.2.1. The narrative on the impact of heritage tourism comes off as so disingenuous. To suggest that it's challenging to measure the specific impact on heritage tourism if two currently vacant and neglected buildings were demolished would eliminate the need to discuss the impact on heritage tourism going forward for the consideration of almost any building. Unless there are ticketed tours being offered, how can we measure the impact of heritage tourism specifically to any one building, and is that the measure we should be focusing on? We know that heritage tourism collectively brings big dollars to communities, so can we safely assert that demolishing historic skyscrapers in a downtown renowned for its skyscrapers will negatively impact heritage tourism? Instead of "Here is where it happened," tours will say "Imagine once the glory that stood on the site of this lot now landscaped with hostas and Kentucky bluegrass." Which tour would you buy tickets to attend?
70. 3.5.2.2. \$407 million to restore the subject properties appears to be highly inflated and impossibly and absorbently expensive. We would like to see some more information included in this report about the source of that estimate and a breakdown of specific costs, along with a second quote and cost comparisons to other historic terra cotta structures in the Downtown area. We see the footnote, but most people are going to skip the footnotes. Please lay out in clear language in this document the sources and assumptions and math behind this number. Did it include a specific assumption on interior buildout? For what end use? We will never discourage the sharing of too much information. That is the basis of transparency.
71. 3.5.2.2. In the breakout of annual positive financial impacts with redevelopment, please add up the cumulative impact just during the long construction period. Annual numbers are impressive. The cumulative numbers are incredible.
72. 3.5.2.2. Language on the math behind the total industry output seems almost dismissive about its impact. To show an impressive number like \$133 million to \$150 million annually and then note the impact would be minimal because it only represents .05 and .06 percent of the entire industry output for all of Cook County. Ask the Chicago Loop Alliance or the Mayor Brandon Johnson if a, let's just say, \$407 million investment in these buildings would be good for the City of Chicago, Downtown, and the community facilities in the neighborhood.
73. 3.5.2.2. As this section moves into the long-term impacts of adaptive reuse, it is noted the assumptions are based on an office reuse. Even though housing has the potential to generate significant long-term benefits to the area, it is a prohibited use. Again, this prohibited use list needs to be reconsidered. Can the GSA, for the sake of informed conversation, do a similar economic analysis of the buildings as an end to housing use? Do you already have those numbers? It would be worth discussing how we can balance security needs with community needs and benefits. We are not federal courthouse security experts, but we do have some

experience in the composition and construction of large buildings. Perhaps we can work together to find a solution that gets both of our agencies to a positive outcome.

74. 3.5.2.2. The language is again hinting at dismissiveness about the potential tax benefits of getting the subject properties back on the tax roll. When the language is limited to what percent of the total tax revenue for Cook County this represents, it does not reflect the powerful impact of these beautiful buildings being filled again with jobs, visitors, workers, business owners, maybe one day residents who work, school, play, and even retire adjacent to the thriving culture and resources in the neighborhood as detailed in this report's own Community Facilities overview. It is always a beneficial and significant long-term impact to have the real estate taxes generated from restored buildings, the jobs created, the money spent on entertainment and dining and culture. Heritage tourism, though it does not have a way to be measured specifically for the long-vacant and neglected subject properties, will benefit from revitalized historic buildings. We should not call it anything short of extraordinary.
75. 3.5.2.2. Here is another understatement of the potential for impact on heritage tourism. Each time a single property (or two) is considered all on its own, the loss of that one place can be categorized as minimal. Please consult any study done by the National Trust for Historic Preservation or Place Economics on the impact of historic preservation and heritage tourism. Perhaps the GSA could consult one of these national subject matter experts to help draft this EIS.
76. 3.5.2.2. On the subject of environmental justice, we ask the GSA to insert a scenario where the adaptive reuse is done with the highest green standards for long-term sustainability. This could be an extraordinary benefit to the environmental justice movement: less pollutants, low-impact/locally sourced materials, state-of-the-art energy efficiency and internal air quality standards. If we can think outside of the box, we can reach some amazing common ground to turn this revitalization into much more than just a historic preservation victory.
77. 3.6.2. Just before Table 3-6.2, this report makes an excellent point that adaptive reuse saves 50% to 75% of embodied carbon compared to new construction. This is an excellent point, and it should be weighted more significantly than it appears to be in this document.
78. 3.6.2.1. When we are talking about greenhouse gas emissions, we object to two things here. First, either pick minor or moderate. There is a wide range within each choice, and it seems hard to accept that it is not possible to be more clear about impacts. But to our second objection, to suggest that the short-term impact would be anything short of significant runs contrary to best practices and knowledge in the industry of buildings.
79. 3.6.2.1. To suggest that the embodied carbon impact of demolition would be negligible again is counter to what we know about the distinctions between demolition and reuse. We need a proper assessment of the carbon impact comparing demolition of the subject properties as compared to their adaptive reuse.
80. 3.6.3. This section suggests that the climate risk of demolition is less than for reuse because the duration of demolition is shorter. This climate risk assessment does not appear to include any impacts on air quality during demolition, reduced capacity in area landfills, and ongoing greenhouse gas emissions from landfill materials. Those omissions should be corrected.

81. 3.7.1.2. This discussion of hazardous materials in the subject properties gives the impression that the GSA has not completed a thorough analysis of the existing buildings as they are advancing against logic for their demolition. We understand that things are exposed in demolition that could not be foreseen without physically removing walls, but are there petroleum tanks anywhere in the building? Where are they located? How many? If the GSA is certain there are no petroleum tanks in the building, why is this language here? There is an indication the roofing materials have not yet been sampled for ACM. Is that going to be done any time soon? No matter which direction these subject properties go, this assessment will bear useful information for planning and moving forward. ACM was “reportedly” confirmed after sampling at 214. It either was or was not confirmed at 214. Can the GSA correct this information in this report?
82. 3.7.2.1. In this discussion of the solid waste impact of demolition, we continue to see a great deal of would, could, and should language. We know a great deal about demolition impacts. Please be specific in describing this impact. It would also be helpful to see here what measures the GSA will be using, and at what cost, to implement the greatest recycling of construction materials? What will be the target percent of materials recycled? And once more, do not blend minor and moderate. When this entire list of impacts is assembled, the GSA can still assert that the negative impact will only be anywhere between the lowest of minimum and the highest of moderate? That’s a big range, and it doesn’t reach where it belongs -- significant.
83. 3.7.2.3. Asserting that a lack of construction debris means the no action alternative will not have a negative waste impact is short-sighted and false. The impact of the equivalent of demolition by neglect is slow and painful, but unchecked it absolutely is intended to lead to demolition. And the loss of historic fiber along the way will be painful and unhealthy to observe.
84. 3.10.2.1. The impact of demolition on children will be greater than minor as this report asserts. The impact of the noise and pollutants will be especially harmful on young, developing humans. With children, adolescents and university students living, staying, and visiting libraries in the immediate area, it is important we are clear on what this alternative would mean in real terms to the people who live, work, study, and play around it.
85. 4.2.1.1. Reading this section on impacts to the Loop Retail Historic District feels almost dystopian. Because there had already been significant deterioration in this historic district before 1998 and it was still intact enough to be listed on the National Register, we can go ahead and tear three more buildings down and it will not have a significant impact. We cannot keep chipping away at our history and expect it to also simultaneously stay intact.
86. 4.2.1.1. To suggest the demolition of the subject properties will only have a moderate cumulative impact on the Federal Center again underestimates the importance Mies Van Der Rohe places on the surrounding built and natural environment in the design of his buildings. His complex stands on its own, but it was never intended to. The GSA should do everything in its power to find a solution that keeps them intact and allows for their complete and viable reuse. The cumulative impact should be escalated to significant.
87. 4.2.1.1. We are required by the rules of this discipline to define artificial boundaries around historic district nominations so we can go about the rest of the business of explaining what is there and how important it is. In the real world, however, we acknowledge that the history of

each of these defined districts flows between one and the other like a glorious spectacle of culture and time. Suggesting that the loss of two significant buildings in this tapestry is nothing short of significant dismisses the very value of historic preservation to our cultural and economic growth and development.

88. 4.2.1.1. Every negative impact for each separate category of historic properties in this section is grossly undervalued. Can we talk through this analysis in one of our future charrette meetings?
89. 4.2.1.2. In each place where it occurs, we are obligated to point it out. This section contains language to the effect that despite previous demolitions prior to 1998, there was still enough integrity to get a National Register designation. Therefore, it is minor to tear down one or three more. It is our express desire that this EIS reflect the more progressive approach we take as a movement in the year 2023. This is not best practice, and this language should be removed.
90. 4.2.1.2. How can the viable restoration and reuse of two significant skyscrapers only yield a negligible beneficial impact to surrounding historic properties? When we visit the dentist, is our goal to get upwards of 50% of our real teeth in our mouth or all of them? We should treat these historic properties like our own teeth.
91. 4.2.2.1. This document asserts that the cumulative aesthetic and visual impact of losing these historic skyscrapers and replacing them with wood-chips and hostas will have a negligible negative impact. Please provide substantiation to back up this claim. Perhaps we can do an illustrated survey of federally owned vacant lots and do an aesthetic and visual assessment with a sample audience of what is more substantial – a restored and reused skyscraper or a vacant lot on a corner lot zoned for high density?
92. 4.2.3.1. This section asserts that the demolition will yield a positive cumulative impact on community facilities because the entrance to the courthouse would be moved to the west side, creating presumably a much-needed public plaza space in the neighborhood. It does seem to ignore the quite large and public gathering plaza directly to the east of the federal courthouse. How many grand plazas does a small area need in an area zoned for high density? Furthermore, these historic buildings, along with the Chicago Federal Center, have been designed by the great masters of architecture, taking into account many of the features we have all collectively identified as significant. Why would any authority even begin to question the greatness of the existing buildings and potentially consider destroying a work of art and architecture.
93. 4.2.3.2. Our intention here is not to badger a point, but to highlight the points that need to be reiterated throughout this document. How can it be suggested reasonably that the adaptive reuse of the subject properties will not have a moderate or significant beneficial impact on the community facilities nearby? Adding people who live, work, and play in an area absolutely strengthens adjacent community facilities, and that if before we can even have a chance to assess what community facilities are missing in the area and could possibly be included in a set of redeveloped buildings?
94. 4.2.4.1. In a discussion of the cumulative socioeconomic impacts of demolition, the language here suggests that demolition of the subject properties may set the Chicago Loop Alliance back on its goals to bring State Street back to life. We encounter the “may” language here. We cannot say with 100% certainty that something will or will not happen in the future, but we can get a lot

closer than “may” in our analysis. Why are we being so gentle with the demolition and dismissive of restoration alternatives? It defies reason, and it does not belong in this document.

95. 4.2.4.1. This section asserts that because we cannot measure which tourists are coming to Downtown Chicago specifically to see the subject properties in their dilapidated state of vacancy, the cumulative impact of lost heritage tourism will be greater than mild. And if the loss of the subject properties does not create a tipping point, which demolition will? Is this what we plan in the 21st Century for great and strong American cities?

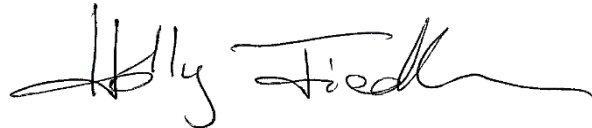
96. 4.2.4.2. We are being asked again to suspend reality when we read here that the restoration of the subject properties will have no cumulative impact on heritage tourism. Please change this language.

We have an opportunity here to do something extraordinarily different to save the subject properties and position ourselves as a City that acts to do bold things for a better future. We want to stand beside the federal government when we celebrate that success, and we do believe it can happen. We look forward to continuing to work with you until it does.

Sincerely,



Ward A. Miller
Richard H. Driehaus Executive Director
of Preservation Chicago



Holly Fiedler
Board Member
Chicago Collaborative of Archive Center
and
Board Member
Franciscan Central Archive

Chicago Collaborative Archive Center Board of Directors

Ward Miller, The Richard H. Driehaus Executive Director of Preservation Chicago, Chicago, Illinois



Malachy McCarthy, Ph.D., Past Province Archivist of the Claretian Missionaries Archives United States-Canada, Chicago, Illinois, and Coordinator of the Archival Resources for Catholic Collections (ARCC)



Christopher Allison, Ph.D., Director of the Mary Nona McGreal Center for Dominican Studies at Dominican University, River Forest, Illinois



Sister Mary Navarre, OP, Ph.D., Director of Archives, Dominican Sisters of Grand Rapids, Michigan



Brie Martin, Interim Director of the Order of Friars Minor Our Lady of Guadalupe Provincial Archives and Library, Chicago, Illinois



Holly Fiedler, Archivist, Sisters of St. Francis of Penance and Christian Charity, Sacred Heart Community, Denver, Colorado, and Board Member of the Franciscan Central Archive (FCA)





CCAC

Chicago Collaborative Archive Center

Preservation Chicago, Dominican University, and members of the Archival Resources for Religious Collections are exploring a sustainable multi-repository archive center in the downtown South Loop. The Chicago Collaborative Archive Center (CCAC) would house collections from various groups providing preservation in perpetuity. The CCAC would have a Board of Directors and operate under a 501(c)(3). At the moment, the CCAC has interest from the following archival groups:

- Franciscan Central Archives
- Order of Franciscan Minor, 6 USA provinces
- McGreal Center for Dominican Historical Studies

These two remarkable buildings, the 16-story Century Building by Holabird & Roche (1915) and the 22-story Consumers Building by Jenney, Mundie & Jensen (1913), were once principally occupied by small businesses, attorney offices and showrooms. Due to their proximity to the courthouse and courtrooms in the adjacent federal courthouse, the General Services Administration (GSA) exercised its power of eminent domain in 2005 to take control of these State Street buildings based on increased security fears following the events of September 11, 2001. Since that acquisition by the GSA, the buildings have been stable but slowly deteriorating due to deferred maintenance and vacancy.

Both Preservation Chicago and Landmarks Illinois listed the buildings on their most endangered lists in 2022 and in previous years. The federal government has budgeted a \$52 million expenditure in the Federal Infrastructure Bill, currently before Congress, specifically for the demolition of the Century and Consumers Buildings. The decades-long advocacy efforts to save these significant buildings is therefore reaching a critical stage. “We are building great momentum on a plan for reuse for these extraordinary buildings,” said Ward Miller, Executive Director of Preservation Chicago. “Our challenge now is to stop the federal wheels of demolition motion and steer toward a viable reuse.”

The CCAC is proposing a national archive center that would employ archival standards to preserve unique and irreplaceable collections. Structurally, archival storage would be assigned the largest area of the buildings. Requiring limited light and a 24-hour climate-controlled environment, it is desired for storage to have a closed environment. This allows for the west walls facing the Federal Center to be sealed from the interior-side of the structures. This would retain the look and appearance of the buildings, especially the Consumers Building, from the street. The collaborative is also encouraging the GSA/Federal Government to partner on this effort, perhaps by continuing to own the exterior skin: walls, terra cotta, and windows of the buildings. Such a plan would allow the GSA to exercise total control of the perimeter and the windows, including those that need to be permanently blocked from the interior side on principal elevations. In addition to the religious archives being proposed, the collaborative is reaching out to civic archive centers who may have a need for space in these remarkable buildings.

This vision has been brought together by the CCAC as well as Ward Miller, Executive Director of Preservation Chicago; JLK Architects, a Chicago woman-owned architectural firm led by Meg Kindelin that has collaborated with the GSA; and Thornton Tomasetti, a structural engineering firm with extensive experience in adaptive reuse projects of historic skyscrapers with this type of age and construction. Together we have had multiple meetings to review and discuss architectural and structural possibilities.

The goal would be to have the archive center operational within 5 years. Costs are a challenge. The CCAC would apply for a planning grant which could include business and strategic planning, assessment of how to assist moving collections to the center, assisting communities and collaboratives in jeopardy, and creation of a website. Then CCAC would apply for an implementation grant to help facilitate the creation of an endowment, as well as hiring a firm to create a communications plan and capital campaign. The CCAC would be taking advantage of federal tax credits.

“There is strength in a collaborative archive. The value of the individual collections within such a repository are increased by the presence of the others,” said Holly Fiedler, Province Archivist, Sisters of St. Francis, Sacred Heart Province. “There are certainly many challenges in making this vision a reality, but we are taking actionable steps forward to achieve the ultimate goal.”

The various archives that would use this building would share staffing and leasing costs. Security would be paramount in this endeavor. The Center would have less than 30 employees and visitors would require reservations. The buildings would require multi-layer access control, surveillance security systems, and scaled zones of security throughout with each floor being locked and secured. There is proposed a central research room, perhaps on the first or second floor. The security team would be at the base entry to the building.

Classrooms, lecture hall, and exhibit space would be on the lower levels, face State and Adams Streets with fixed hours, and have appropriate security monitoring. Possible commercial space could be in the Century building, facing State and Adams Streets, and be on the ground floor with fixed hours of operation.

“A collaborative archive of this proposed size is rare in the country,” said Christopher Allison, a historian and Director of the McGreal Center at Dominican University. “It would become a major hub for archive-based research, and would consolidate precious sources in one space.” Allison also said that it would add to the rich educational resources of the Loop. “Our Graduate School of Information Studies could be a productive presence in the building, providing not only classes but also hands-on internships and employment for future professionals.” There are multiple other universities within the downtown area who would find value in the CCAC through research, program development, and other opportunities.

“As members of the collaborative keep exploring this archives option, we are even more convinced this is the best solution – both for the city and these buildings,” said Malachy McCarthy, Province Archivist for the Claretian Missionaries Archives USA-Canada. “It fulfills the security needs of the central government, and it could be a home for historic archive collections with no place to go.”

The creation of a collaborative archive in the heart of downtown enhances Chicago’s reputation as a learning and resource center. The Society of American Archivists and the American Library Association are headquartered in Chicago. The city’s academic institutions and the welcoming of outside scholars have made Chicago one of the most documented cities in the United States. The CCAC provides the city and region a unique opportunity to create a new research center model where scholars could find a multiplicity of collections in one block, with a short elevator ride the only barrier in the broadening of our understanding of the world.

For further information:

Ward Miller
Preservation Chicago

Malachy McCarthy
Claretian Missionaries Archives

Holly Fiedler
Sisters of St. Francis, SHP

Christopher Allison
Dominican University

Note: One of 394 identical comments is presented below. Due to repetitive content, the additional 393 comments are not displayed.



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Don't Demolish the Century and Consumers Buildings

1 message

[REDACTED]
To: statestreet@gsa.gov

Sun, Oct 1, 2023 at 2:12 AM

Dear General Services Administration,

Today, I write to ask you not to demolish Chicago's Century and Consumers Buildings.

As two iconic early skyscrapers in downtown Chicago's historic district, the Century and Consumers Buildings contribute to the architectural significance of the Loop. Architecture firms Jenney, Mundie & Jensen designed the Consumers Building in 1913, and Holabird & Roche designed the Century Building in 1915.

As you continue federally mandated reviews to weigh options for the Century and Consumers Buildings, I ask that you work with all parties to identify a preservation-based reuse that also meets security needs in order to avoid these places' wasteful demolition.

Thank you.

[REDACTED]



DEPARTMENT OF PLANNING AND DEVELOPMENT
CITY OF CHICAGO

October 31, 2023

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

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

Dear Mr. Mulligan:

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

Draft EIS Edits

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

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

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

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

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

Local Impact

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

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

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

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

Sincerely,



Kandalyn Hahn
Historic Preservation Division

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



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www.Landmarks.org

October 31, 2023

(VIA EMAIL)

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

Re: Response to Draft EIS for 202-220 S. State Street

Mr. Mulligan:

Thank you for the opportunity to provide comments on the draft EIS prepared for 202-220 S. State Street, Chicago. Broadly, Landmarks Illinois has the following concerns about the draft EIS as presented:

- There is insufficient explanation as to why additional alternatives were reviewed and dismissed without further consideration
- The impacts of demolition are understated
- Proposed mitigation measures are insufficient

We will explore specific concerns in further detail in the remainder of this letter, with section headings corresponding to sections of the draft EIS.

Section 2: Description of the Proposed Action and Alternatives

We previously commented on Alternatives A, B, and C in our letter of December 12, 2022 that was submitted in response to a call for public scoping. We would like to take this opportunity to comment individually on alternatives that were dismissed from consideration. In most cases, we cannot conclude based on the information shared in the draft EIS that these alternatives have received full and adequate consideration.

2.3.1 Retrofit the Dirksen Courthouse

The draft EIS dismisses the possibility of retrofitting the Dirksen Courthouse based on claims that additional countermeasures at the Dirksen Courthouse are cost prohibitive or not possible because of the design and construction of the courthouse. The public deserves to understand why hardening the Dirksen Courthouse is considered prohibitive and to be informed of the estimated costs to introduce

additional countermeasures that would be compatible with the courthouse's design and construction before that alternative is dismissed as infeasible.

2.3.2 Relocate the Dirksen Courthouse

Again, the public deserves to understand the estimated costs of relocating the courthouse before this alternative is dismissed. As the draft EIS identifies the Dirksen Courthouse as the largest in the country, presumably a new courthouse for Chicago could be competitive when seeking congressional funding.

2.3.3 Federal Occupancy of State Street Properties

The draft EIS dismisses the possibility of federal occupancy of the State Street buildings based on lack of federal agency use for the space and a directive for the federal government to reduce its footprint. The draft EIS does not consider the possibility of relocating federal office space from other areas of the city, although there are several other facilities housing federal employees in downtown Chicago. If these federal offices were to be consolidated along State Street, then federal office spaces in other areas of downtown with fewer security concerns could be turned over to non-federal uses.

2.3.5 Government Sale of State Street Properties and 2.3.6 Adaptive Reuse – Residential Redevelopment

Both of these alternatives are stymied by the viable adaptive reuse criteria. We have commented in the past that we find the adaptive reuse criteria overly restrictive and not responsive to current market conditions and demands in Chicago. Providing additional justification based on the City of Chicago's past inability to fulfill those same criteria is mere obfuscation, and we believe that reference should be removed.

Section 3: Affected Environment and Environmental Consequences

3.1 Cultural Resources

We strongly agree with the characterization that Alternative A: Demolition would have impacts that are negative, significant, and long-term. The demolition of 202, 214, and 220 S. State Street would irrevocably erase these historic resources, diminish the overall integrity of the Loop Retail Historic District, and remove critical context for the Chicago Federal Center, the very complex that this action seeks to safeguard.

We also agree that adaptive reuse would have impacts that are beneficial, negligible-to-moderate, and long-term. Adaptively reusing these buildings will

breathe life back into a stretch of State Street that has been inactive for far too long. Although some alteration may be required to put the buildings back into active use, the potential negative impacts pale in comparison to the impacts of demolition, or to the impacts of no action.

Finally, while we agree that Alternative C: No Action would have impacts that are negative and long-term, it is our position that these impacts are likely to be significant, not moderate. To date, GSA's available funding and actions have been insufficient to the maintenance needs of the buildings, and instead have been at best reactionary to a declining state of affairs. GSA will continue to have limited federal funds available for maintenance and repairs. Thus, it is realistic to expect that the status quo will result in the continued deterioration of these buildings. Lack of maintenance has already contributed to the demolition of 208-212 S. State Street, and we can reasonably predict that 202, 214, and 220 may eventually meet the same fate if no action is taken.

3.2 Aesthetic and Visual Impacts

We strongly disagree with the finding that Alternative A would result in minor-to-moderate impacts to the aesthetic and visual environment. Rather, we believe these impacts would be significant. State Street is one of the densest corridors in the City of Chicago. The visual hole that would be left permanently in the streetscape if the existing buildings were to be demolished and replaced with open space would be totally inconsistent with the character of the corridor. Moreover, the mitigation proposed is not adequate. Although there are examples of flat green spaces and plazas in the greater Loop area, with the exception of Pritzker Park, these examples are not located along State Street. Open space with landscaping is not consistent with the aesthetic and visual character of State Street, and we do not agree that this mitigation would result in only a minor noticeable compatibility and sensitivity change by viewers.

Additionally, the draft EIS reports that the open space resulting from demolition would "possibly" be open to the public. The proposed mitigation becomes even less sufficient if the resulting open space is not guaranteed to be publicly accessible. The final EIS should include information on whether the public can actually expect access to this space if the GSA proceeds with Alternative A.

3.6 Greenhouse Gas, Climate Change, and Embodied Carbon

We appreciate the draft EIS's use of and reference to CARE tool for estimating the embodied carbon impacts of the existing buildings; however, it is not clear how the draft EIS arrives at the conclusion that 5,500 tons of carbon dioxide equivalent, equivalent of carbon sequestered by 16,300 acres of forest, is a negligible impact under Alternative A. The final EIS should elaborate on the threshold for what is considered negligible. Even if no new building is constructed on this site, it is still

wasteful of embodied carbon to demolish these buildings. Moreover, reuse of the buildings could decrease need for new construction on an alternative site.

Section 4: Cumulative Impacts

4.2.1 Cultural Resources

The EIS should not consider cumulative demolition impacts from demolitions that took place in the Loop Retail Historic District before the district was designated in 1998, since the district was evaluated at that time to have sufficient integrity for designation. Pre-1998 demolitions did not diminish the integrity of the future historic district since it had not yet been evaluated for integrity. The reference to pre-1998 demolitions in this section is confusing for the reader.

Conclusion

In summary, we question whether the draft EIS commits to full and transparent exploration of possible alternatives, have concerns that the impacts of demolition are undervalued, and find that the mitigation proposed is poor compensation for the loss of the historic buildings at 202-220 S. State Street. Demolition of these buildings remains the wrong choice for Chicago. We look forward to continuing to consult with your agency in the hopes that you will make the right choice to pursue adaptive reuse for these buildings. Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kendra Parzen", with a long horizontal flourish extending to the right.

Kendra Parzen
Advocacy Manager
Landmarks Illinois



October 31, 2023

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

Re: Draft Environmental Impact Statement (EIS) for The Buildings at 202, 214, and 220 South State Street, Chicago, Illinois

Dear Mr. Mulligan,

The National Trust for Historic Preservation (“National Trust”) continues to object to the Draft Environmental Impact Statement for the Buildings at 202, 214, and 220 South State Street, Chicago, Illinois (“DEIS”). The concerns we communicated to you in our December 12, 2022 scoping comments remain unaddressed, and the DEIS remains fundamentally inadequate. The General Services Administration (“GSA”) should pause this review process to address the DEIS’s flaws and to address the many concerns about this project that have been consistently and vehemently expressed by the public.

The National Trust reiterates our request that the DEIS be revised to include a feasible preservation alternative. Currently the DEIS describes three alternatives, but as we detailed in our December 12, 2022 letter (attached), the restrictions included in Alternative B (“Viable Adaptive Reuse”) render it meaningless. The DEIS proposes two other alternatives: Alternative A, Demolition, or the No Action Alternative. Sadly, in the past year we have been made aware of the shocking degree of neglect suffered by these historic buildings. This failure of stewardship by GSA forces us to conclude that even the No Action Alternative would result in cumulative adverse effects to historic resources.¹

The DEIS thus exclusively proposes alternatives that would result in adverse effects to historic resources, and alternatives that at their core are contrary to the public interest. The National Trust is eager to participate in meaningful conversations with GSA to develop a feasible preservation alternative that would result in both the adequate provision of security for the Dirksen Courthouse and the preservation of the historic Century and Consumers Buildings at 202, 214, and 220 South State Street. We are confident that such an alternative is possible, and that it would be a superior outcome to what the DEIS presently contemplates.

Sadly, we continue to be unable to have a meaningful conversation with the decision-makers who insist on applying the restrictions listed in Alternative B to any adaptive reuse of the Century and Consumers Buildings. The National Trust and other

¹ This stewardship failure also exacerbates concerns expressed in our scoping comments regarding the federal government’s abuse of eminent domain authority in this case.



consulting parties have repeatedly proposed compromise solutions, such as studying what security measures could be located within the Dirksen Courthouse to reduce the security needs at the Century and Consumers Buildings, and the possibility of installing interior partitioning within the Century and Consumers Buildings in order to allow for at least some residential use. Unfortunately, these proposals, and all attempts at consultation regarding economically viable adaptive reuses for the Century and Consumers Buildings, have been met with an absolute unwillingness to compromise. The 15 proposed restrictions applicable to Alternative B prevent the Adaptive Reuse option from achieving viability. Yet these restrictions remain unchanged, despite widespread opposition, and many constructive proposals for compromise.²

We understand that GSA is not the source of this unwillingness to engage in meaningful consideration of alternatives. We sincerely appreciate the work of GSA staff, and we hope to continue to work with GSA to develop a legitimate preservation alternative. This is an exceptionally challenging situation, and the National Trust would like to help develop an optimal resolution. Unfortunately, we cannot do so if meaningful dialogue cannot occur, and if we are presented with a DEIS that only proposes alternatives that result in adverse effects to historic properties and that are contrary to the public interest. We again urge the GSA to pause this review process to more meaningfully address the comments and concerns that have been vociferously offered to you by the public. Thank you very much for your consideration of our comments.

Sincerely,



Elizabeth S. Merritt
Deputy General Counsel



Chris Cody
Associate General Counsel

Enclosure: Scoping Comments, National Trust for Historic Preservation (Dec. 12, 2022)

² The National Trust is currently participating in the charrette process for this project in connection with the Section 106 review. During the September 28, 2023 charrette session, the representative from the U.S. Marshals Service again declined to discuss any opportunities for Alternative B's restrictions to be amended or addressed in other ways. He instead instructed the group to develop their own proposals, then submit them for security review afterwards. This evasion of meaningful dialogue concerning the restrictions has been persistent throughout the review of this project and is preventing the development of a legitimate preservation alternative.

cc: Beth Savage, Federal Preservation Officer, GSA
Christopher Koepfel and Laura Lavernia, ACHP
Carey Mayer, Illinois SHPO
Kendra Parzen, Landmarks Illinois
Ward Miller, Preservation Chicago

1 **Government Agency Comments**

Hello Mr. Mulligan,

I am the lead NEPA reviewer for the DEIS for The Buildings at 202, 214, and 220 South State Street. We were expecting the DEIS to identify a preferred alternative, but the document did not identify one. 40 CFR Section 1502.14(e) requires the section on alternatives in an EIS to "*identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement...*"

If a lead Federal agency has a preferred alternative at the Draft EIS stage, that alternative must be labeled or identified as such in the Draft EIS. If the lead Federal agency has no preferred alternative at the Draft EIS stage, a preferred alternative need not be identified there. However, it is expected that a DEIS would be clear on which was the case. If GSA at this point in the NEPA review has not identified a preferred alternative, the DEIS should have been clear on that.

Can you please clarify if there is a Preferred Alternative at this time, and if yes, what the Preferred Alternative is? Alternately, if there is not a Preferred Alternative at this time, can you please confirm as much?

Looking forward to hearing from you,

Liz Pelloso

+++++



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance

IN REPLY REFER TO:

October 24, 2023

4112.1
ER23/0383

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

RE: Draft Environmental Impact Statement, The Buildings at 202, 214, and 220 South State Street, Chicago, Illinois

Dear Joseph Mulligan,

The U.S. Department of the Interior (Department) has reviewed the subject Draft Environmental Impact Statement for the proposed project. The Department does not have comments at this time.

Thank you for the opportunity to comment.

Sincerely,

John Nelson
Regional Environmental Officer

Electronic distribution: statestreet@gsa.gov



REGION 5

CHICAGO, IL 60604

October 25, 2023

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

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

Dear Mr. Mulligan,

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

The DEIS assesses the environmental impact of alternatives for the future of three vacant GSA-owned buildings located east of the Everett McKinley Dirksen U.S. Courthouse (Dirksen Courthouse) in downtown Chicago, Illinois. The buildings are at 202, 214, and 220 South State Street. Two of the buildings, the 16-story Century Building (202 South State Street) and the 21-story Consumers Building (220 South State Street), are contributing buildings to the Loop Retail Historic District, which is listed on the National Register of Historic Places (National Register). The building at 214 South State Street was found to not contribute to the Loop Retail Historic District when it was listed because it lacked integrity due to extensive exterior alterations. However, it retains a distinctive Moderne-style¹ storefront from the 1940s, which falls within the period of significance for the Loop Retail Historic District. Therefore, GSA considers 214 South State Street as contributing to the Loop Retail Historic District for purposes of this undertaking and the DEIS. In 2022, Preservation Chicago announced the Century and Consumers buildings as their top candidate for the Chicago Seven Most Endangered Buildings. These buildings have been part of Preservation Chicago's "most endangered" list since 2011.

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

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

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

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

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

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

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

² Public Law No. 117-103

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

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

accordance with the required Federal viable adaptive reuse criteria.⁵ These criteria are necessary to meet security objectives for the Dirksen Courthouse and would apply to any future uses of the buildings. No federal funds are available for the rehabilitation, preservation, or restoration of 202, 214, and 220 South State Street; therefore, any rehabilitation or modification of the buildings to meet the criteria would not be performed at the Federal government's expense.

- **Alternative C (No Action Alternative)** - Under the No Action Alternative, GSA would continue to monitor the buildings' conditions and secure the buildings. The buildings would remain in place, vacant, and in need of significant repairs. GSA would continue to have limited federal funds available to continue with required maintenance, including façade inspections, emergency repairs (as needed), and security.

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

Thank you for the opportunity to review and provide comments on the DEIS. When the Final EIS (FEIS) is released, please notify our office electronically at [REDACTED]. If you have any questions about this letter or wish to discuss EPA's comments, please contact the lead NEPA Reviewer, Liz Pelloso, at [REDACTED] or via email at [REDACTED].

Sincerely,

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

Enclosures (2):

EPA Detailed Scoping Comments
Construction Emission Control Checklist

CC (with enclosures):

C.J. Wallace, IL SHPO [REDACTED]
Laura Lavernia, ACHP [REDACTED]
[REDACTED]

⁵ See Section 2.1.2 of the DEIS.

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

October 25, 2023

PROJECT ALTERNATIVES

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

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

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

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

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

⁶ See Section 2.1.2 of the DEIS.

does not allow the developer to sell the building at the end of their investment period. As a result, these leases typically span from 50 to 99 years to allow the developer time to recoup their investment in the property. In exchange, this lease type allows GSA to control the use and development of the property without any financial investments or transfer of property ownership.

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

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

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

NATIONAL HISTORIC PRESERVATION ACT CONCERNS

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

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

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

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

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

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

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

Recommendations for the FEIS:

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

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

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

¹¹ The proposal, submitted in December 2017 by the U.S. Department of the Interior, includes nine primarily commercial buildings in the Chicago Loop constructed over a period of about 20 years starting in the 1880s. These nine buildings exemplify the first generation of skyscrapers and used new technologies of the time, particularly internal metal structural systems instead of load-bearing masonry walls. The buildings rose to heights of near 20 stories, with large plate-glass windows, the first elevators to reach the high floors, and electric lights to make interior spaces usable (UNESCO 2017). Although the three buildings at 202, 214, and 220 South State Street are not among the nine buildings in the proposal, the Century and Consumers buildings (202 and 220 South State Street) are two examples of Chicago's early skyscrapers and are within four blocks of eight of the nine buildings in the proposal.

authority and funding to demolish the buildings; and

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

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

ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES

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

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

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

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

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

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

GREENHOUSE GAS REDUCTION AND CLIMATE CHANGE

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

As EPA previously stated to GSA, estimates of the social cost of greenhouse gases (SC-GHG¹³) are informative for assessing the impacts of GHG emissions. SC-GHG estimates allow analysts to monetize the societal value of changes in GHG emissions from actions that have small, or marginal, impacts on cumulative global emissions. Estimates of the social cost of carbon (SC-CO₂) and other greenhouse gases (e.g., social cost of methane (SC-CH₄)) have been used for over a decade in Federal government analyses. Quantification of anticipated GHG releases and associated SC-GHG comparisons among all alternatives (including the No Action Alternative scenarios) within the DEIS

¹³ EPA uses the general term, "social cost of greenhouse gases" (SC-GHG), where possible because analysis of GHGs other than CO₂ are also relevant when assessing the climate damages resulting from GHG emissions. The social cost of carbon (SC-CO₂), social cost of methane (SC-CH₄), and social cost of nitrous oxide (SC-N₂O) can collectively be referenced as the SC-GHG.

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

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

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

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

Emissions & SC-GHG Disclosure and Analysis

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

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

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

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

- Use SC-GHG estimates to disclose and consider the climate damages from net changes in direct and indirect emissions of CO₂ and other GHGs resulting from the proposed project. To do so, EPA recommends a breakdown of estimated net GHG emission changes by individual gas, rather than relying on CO₂-equivalent (CO₂e) estimates, and then monetize the climate impacts associated with each GHG using the corresponding social cost estimate (i.e., monetize CH₄ emissions changes expected to occur with the social cost of methane (SC-CH₄) estimate for emissions).¹⁷ When applying SC-GHG estimates, just as with tools to quantify emissions, GSA should disclose the assumptions (e.g., discount rates) and uncertainties associated with such analysis and the need for updates over time to reflect evolving science and economics of climate impacts.

Resilience and Adaptation

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

Reduction and Mitigation

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

OTHER COMMENTS

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

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

¹⁷ Transforming gases into CO₂e using Global Warming Potential (GWP) metrics, and then multiplying the CO₂e tons by the SC-CO₂, is not as accurate as a direct calculation of the social costs of non-CO₂ GHGs. This is because GHGs differ not just in their potential to absorb infrared radiation over a given time frame, but also in the temporal pathway of their impact on radiative forcing and in their impacts on physical endpoints other than temperature change, both of which are relevant for estimating their social cost but not reflected in the GWP. See the Interagency Working Group on Social Cost of Greenhouse Gases’ February 2021 *Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990* for more discussion and the range of annual SC-CO₂, SC-CH₄, and SC-N₂O estimates currently used in Federal benefit-costs analyses.

U.S. Environmental Protection Agency **Construction Emission Control Checklist**

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.¹ We recommend GSA consider the following protective measures and commit to applicable measures in the Final EIS.

Mobile and Stationary Source Diesel Controls

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

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

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

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric

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

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

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

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

vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

NEPA Documentation

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

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



Joseph Mulligan - 5P2DA <joseph.mulligan@gsa.gov>

Correction needed

1 message

'Morris, Stephen' via State Street North Site <statestreet@gsa.gov>

Thu, Nov 16, 2023 at 12:40 PM

Reply-To: "Morris, Stephen" [REDACTED]

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

Dear Mr. Mulligan,

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

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

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

Sincerely,

Stephen Morris
Chief
Office of International Affairs
National Park Service

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