



GSA Great Lakes Region

Buildings at 202, 208-212, 214,  
and 220 South State Street  
Environmental Impact Statement

# Public Scoping Meeting

November 10, 2022

# Hybrid In-person/Virtual Meeting

- This Zoom meeting is being recorded.
- **The meeting presentation will start at 4:20 PM.**
- In the meantime, the meeting handout and comment form have been provided in the chat, as well as a link to the Notice of Intent (NOI).
- Participants will be muted during the meeting.
- If you have requested to participate in the formal comment period, you will be asked to unmute and provide your comment when your name is called.
- A transcript of the meeting will be included in the Environmental Impact Statement (EIS).
- Comments left in this meeting chat are not considered part of the formal public record.
- Participants may submit comments by email ([StateStreet@gsa.gov](mailto:StateStreet@gsa.gov)) or regular mail (see handout) until December 12, 2022.

# Introductions

- Joseph Mulligan, GSA Project Manager
- Michael Gonczar, GSA R5 NEPA Program Manager
- Regina Nally, GSA R5 Regional Historic Preservation Officer
- Charlie Webb, Jacobs

# Purpose

- To obtain public input on alternatives, impacts and other information to be considered in the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) process.
- Provides opportunity for public involvement in the National Historic Preservation Act (NHPA) Section 106 process.

# Agenda

Background

National Environmental Policy Act  
(NEPA) Process

National Historic Preservation Act  
(NHPA) Process

Role of GSA and Other Government  
Agencies

Introductory Remarks

Public Scoping Comments

# Background

Project Background

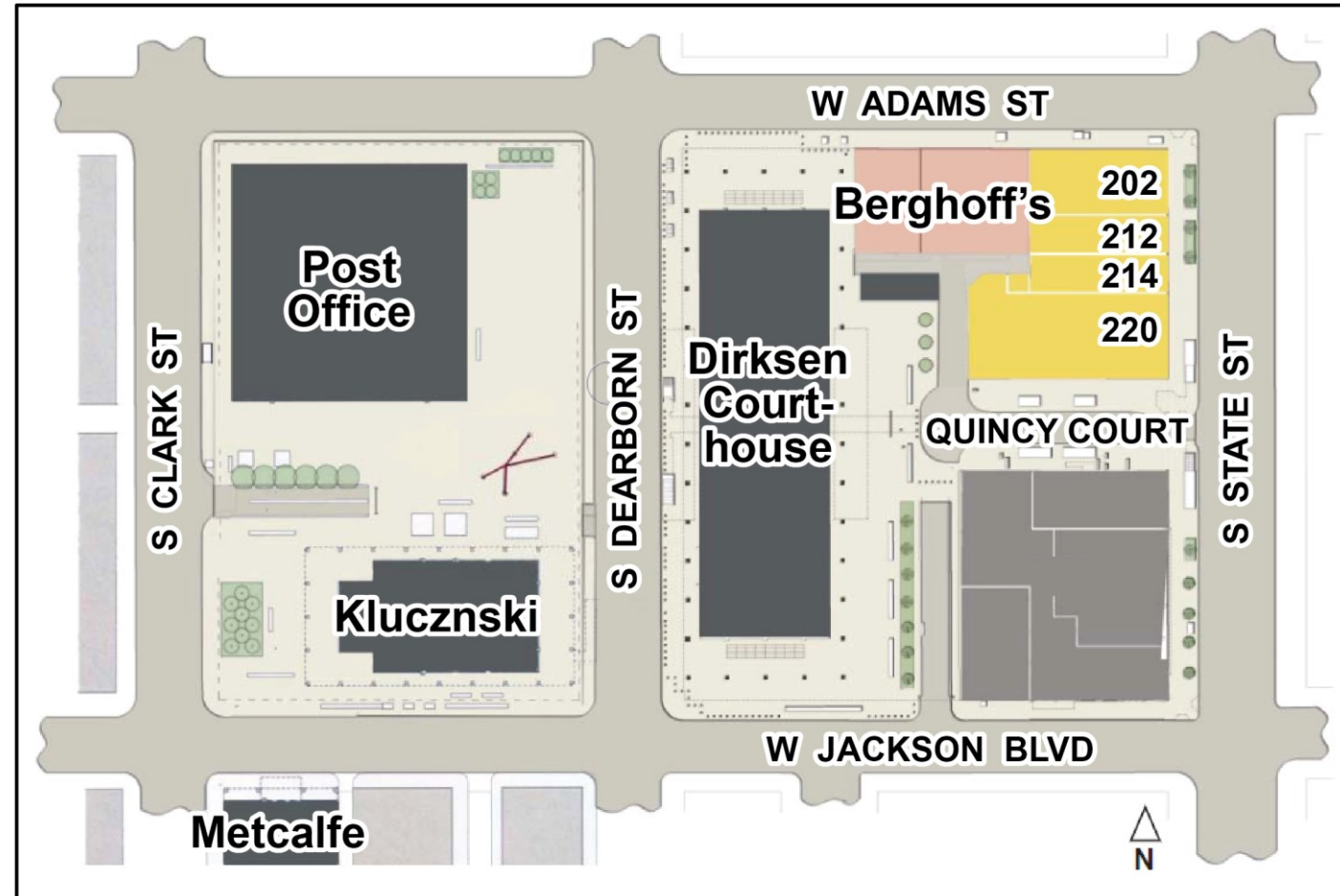
History of Buildings

Loop Retail Historic District



# Project Background

The General Services Administration (GSA) is evaluating potential environmental impacts associated with **the future of the buildings at 202, 208-212, 214, and 220 South State Street**, adjacent to the Dirksen U.S. Courthouse in downtown Chicago, Illinois.



# History of the Buildings

GSA acquired the buildings at 202, 208-212, 214, and 220 South State Street in 2007.

The buildings became unoccupied and were unsuitable for use by 2014 and surrounded with scaffolding as a public safety measure.



| <b>202 South State Street<br/>(Century Building)</b>   | <b>208-212 South State Street<br/>(John R. Thompson Company Building)</b>  | <b>214 South State Street</b>  | <b>220 South State Street<br/>(Consumers Building)</b>   |
|--|--|--|--|
| 16-story commercial-style building with Late Gothic details, clad in terra cotta, designed by Holabird & Roche, and constructed in 1915. | Three-story retail building, designed by Marshall & Fox, and constructed in 1920; stucco facade dates from circa 1995. | Originally a six-story Italianate-style building, designed by C.M. Palmer, and constructed in 1887; reduced to four stories circa 1920 and later re-clad in metal. | 21-story Chicago School office building with Classical Revival details, clad in terra cotta, designed by Mundie & Jensen, constructed in 1913. |

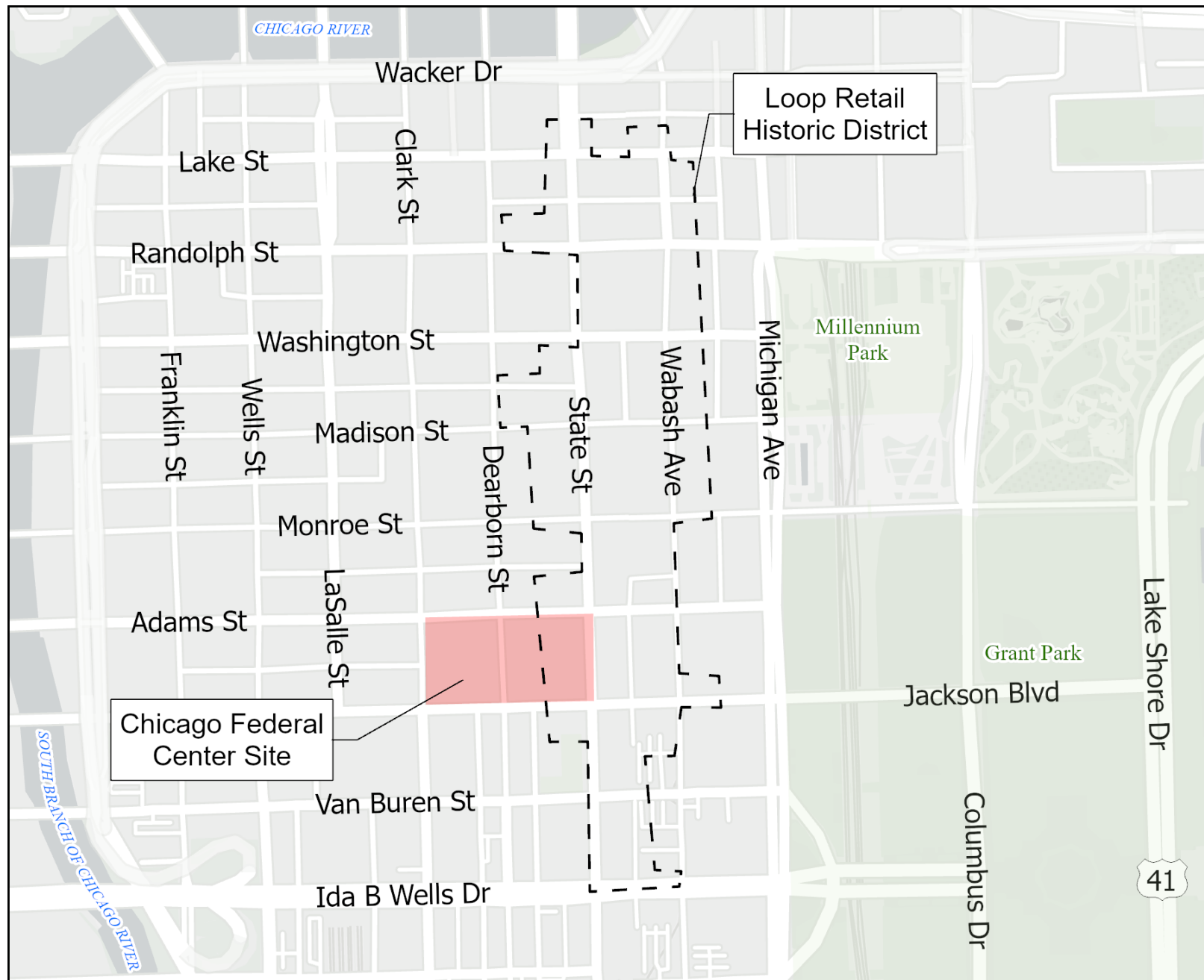


# Loop Retail Historic District

The four buildings are located within the National Register of Historic Places (NRHP)-listed Loop Retail Historic District.

The historic commercial/retail area of Chicago has both historical and architectural significance.

202 and 220 South State Street are contributing buildings to the district.



# NEPA & NHPA Processes

# National Environmental Policy Act (NEPA)

NEPA requires federal agencies to consider the anticipated environmental impacts of proposed federal actions as part of their decision-making process and to provide appropriate public involvement.

| Fall 2022  | Spring 2023  | Fall 2023   | Winter 2024   |
|--|--|---|---|
| Publish Notice of Intent (NOI).<br><br>Conduct public scoping meeting. | Publish Draft Environmental Impact Statement (EIS).<br><br>Solicit public comments and conduct Draft EIS public hearing. | Publish Final EIS and identify the preferred alternative. | Issue Record of Decision with the selected alternative. |

# NEPA Scoping Process

Scoping is the process of getting public input on potential impacts, alternatives, and information that will be considered in the EIS.

Affected and interested parties provide feedback to identify relevant issues, alternatives, mitigation measures, and analytical tools to be incorporated into the EIS.

There will be a public hearing to receive comments on the Draft EIS in Spring 2023.

# Purpose and Need

The purpose of the project is to address the potential security vulnerabilities associated with the buildings at 202, 208-212, 214, and 220 South State Street, in response to the passing of the 2022 Consolidated Appropriations Act, which calls for the demolition of these buildings to effectively manage excess federal property.

The project is needed to address security, respond to congressional intent, and manage assets.

# Proposed Alternatives

GSA has identified the following initial alternatives:

| <b>Demolition</b><br>(Alternative A)  | <b>Viable Adaptive Reuse</b><br>(Alternative B)   | <b>No Action</b><br>(Alternative C)  |
|---|---|--|
| <p>Demolition of four buildings at 202, 208-212, 214, and 220 South State Street, Chicago, Illinois, in accordance with the 2022 Consolidated Appropriations Act.</p> | <p>GSA will consider viable adaptive reuse alternatives if they meet the 15 criteria listed in the NOI and Interagency Security Committee standards. No federal funds are available for rehabilitation, preservation, or restoration of buildings at 202, 208-212, 214 or 220 South State Street.</p> | <p>GSA would take no action; the buildings would remain in place and vacant.</p> |

# Alternative B: Viable Reuse Criteria

1. The federal government must retain ownership interests to achieve its security objectives.
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 restricted in a manner to achieve court security and prohibited in Quincy Court. Loading on State or Adams Streets would be subject to local ordinance requirements.

# Alternative B: Viable Reuse Criteria (cont.)

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 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.



# Alternative B: Viable Reuse Criteria (cont.)

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.

# National Historic Preservation Act (NHPA) Process

The NHPA Section 106 process seeks to accommodate historic preservation concerns with the needs of the federal undertakings through consultation with the State Historic Preservation Office (SHPO) and interested parties.

| Fall 2022  | Winter 2022/2023   | Spring/Summer 2023   | Fall 2023  | Winter 2024                              |
|--|--|--|--|--|
| <p>Publish NOI.</p> <p>Initiate NHPA Section 106 Process with SHPO.</p> <p>Identify interested consulting parties.</p> | <p>Define Area of Potential Effects (APE) and identify properties within the APE.</p> <p>Evaluate properties within the APE for National Register of Historic Places (NRHP) eligibility.</p> <p>Determine if historic properties may be affected.</p> <p>Identify and invite consulting parties to participate in the Section 106 process.</p> | <p>Assess effects on historic properties.</p> <p>Coordinate with consulting parties.</p> | <p>Seek agreement to resolve adverse effects on historic properties.</p> | <p>Complete the Section 106 process.</p> |

# 202 South State Street Fire Escape and Parapet

Fire escape and parapet on north side of building is in poor condition.

To ensure pedestrian safety, GSA determined that the lower portions of the fire escapes at 208-212, 214, and 220 South State Street and the entire fire escape and parapet at 202 South State Street should be removed.

GSA is conducting Section 106 consultation for this undertaking with the Illinois State Historic Preservation Officer (SHPO).

This is a separate project; it will not be part of the EIS for the long-term future of the buildings.



# What is a Consulting Party?

Those with consultative roles in the Section 106 process may include:

- State Historic Preservation Officer (SHPO)
- Representatives of local governments
- Applicants for federal assistance, permits, licenses, and other approvals
- Native American Tribes
- Advisory Council on Historic Preservation
- Other individuals, government agencies, and organizations with a demonstrated interest in the undertaking or the affected historic properties

Those wishing to be a consulting party can request to do so during today's meeting or by submitting a comment.

# Scoping Comment Period

**Verbal and written comments are given the same priority and consideration.**

- Comments on scoping issues may be submitted during this meeting, either verbally or in writing via comment sheets.
- Scoping comments can also be submitted up to 30 days after the meeting (must be submitted by Monday, December 12, 2022).
- How to comment:
  - Submit a scoping **comment form** in the comment box tonight
  - **Email:** [StateStreet@gsa.gov](mailto:StateStreet@gsa.gov)
  - **Mail to:** Joseph Mulligan, General Services Administration, 230 S. Dearborn Street, Suite 3600, Chicago, Illinois 60604

# Role of GSA and Other Government Agencies

# Agency Roles and Responsibilities

## Lead Federal Agency - GSA

- GSA is the lead federal agency for preparing the EIS.

## Other Federal Agencies

- U.S. District Court for the Northern District of Illinois
- U.S. Bankruptcy Court Northern District of Illinois
- U.S. Court of Appeals for the Seventh Circuit
- Federal law enforcement (U.S. Marshals Service, Federal Protective Service, FBI, Bureau of Alcohol Tobacco and Firearms)

# Next Steps

**We are here** →

## Reminder:

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**Public Scoping**

Fall 2022

**EIS Development**

Winter  
2022/2023

**Public Review of Draft EIS**

Spring 2023

**Public Review of Final EIS**

Fall 2023

**Record of Decision**

Winter 2024



# Introductory Remarks

# Public Scoping Comments

# Public Scoping Comments

- 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.
- Your remarks will be limited to 3 minutes.
- At the beginning of your comment, please state your name.
- The Panel will listen to the 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. Verbal and written comments are weighted the same during the review process.
- GSA will consider public input received during the scoping process in the Draft EIS. All comments received will be part of the public record.

# Public Scoping Comments Timer

**03:00**

# Next Steps

**We are here** →

**Public Scoping**

Fall 2022

**EIS Development**

Winter  
2022/2023

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