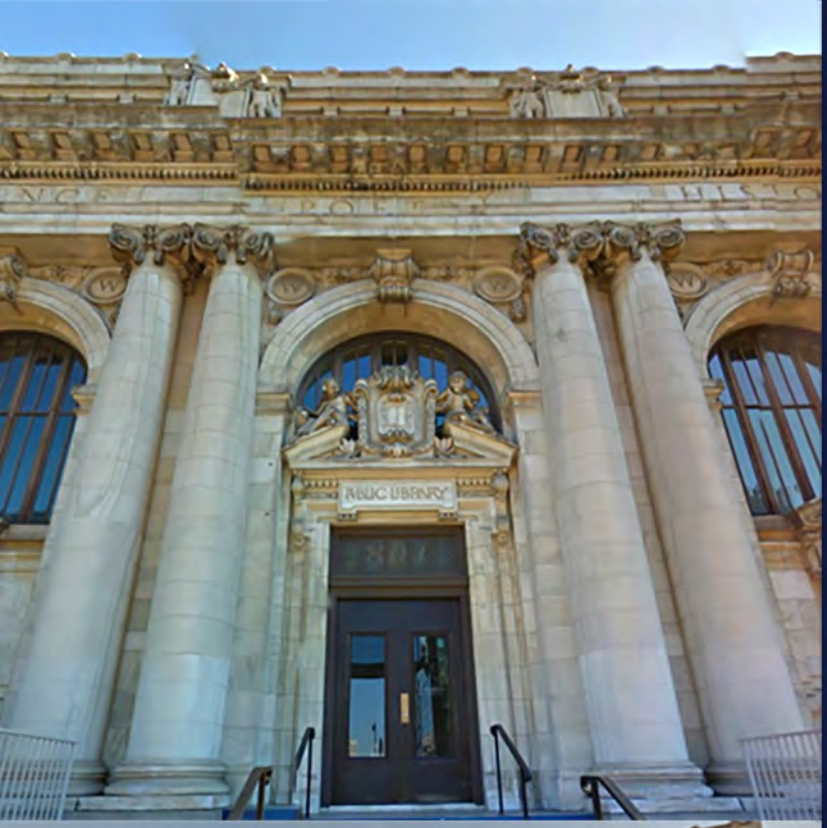

REHABILITATION AND RENOVATION OF THE CARNEGIE LIBRARY AT MOUNT VERNON SQUARE

ENVIRONMENTAL ASSESSMENT

Prepared by:

National Capital Planning Commission

In Cooperation with:

Events DC

July 2017

With Technical Assistance from:

Stantec

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EXECUTIVE SUMMARY

The National Capital Planning Commission (NCPC), in cooperation with Events DC, has prepared an Environmental Assessment (EA) to evaluate impacts of alternatives for the rehabilitation of the Carnegie Library building at Mount Vernon Square in Washington, DC.

This EA evaluates the impacts of the proposed rehabilitation, the Action Alternative, and a No-Action Alternative on the natural and human environment. The purpose of the proposed action is to rehabilitate and modernize the Carnegie Library to serve as a new city square for Washington, DC, where the community can come to learn, be entertained and collaborate. The project would include the rehabilitation of the interior and the restoration of the exterior of the Carnegie Library. The proposed project would also include restoration of the historic light well in the central atrium space and reconfiguration of the north entrance. The Library would be leased jointly by the Historical Society of Washington (HSW) and a retail tenant that would operate a retail, events, and educational facility in the building.

The proposed project is subject to the review of NCPC under the National Capital Planning Act. This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality's Regulations for Implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508), NCPC's implementing regulations (69 FR 41299), and the National Capital Planning Act.

Questions or comments on the EA should be addressed to:

National Capital Planning Commission
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Washington, DC 20004
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ACM	Asbestos Containing Material
ACOE	U.S. Army Corps of Engineers
ACS	American Community Survey
ANC	Area Neighborhood Commission
APE	Area of Potential Effect
ASTM	American Society for Testing and Materials
BLS	Bureau of Labor Statistics
BMP	Best Management Practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFA	Commission of Fine Arts
CFR	Code of Federal Regulations
CH_4	Methane
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CSO	Combined Sewer Overflow
CSS	Combined Sewer System
CTR	Comprehensive Transportation Review
CWA	Clean Water Act
CWP	Center for Watershed Protection
CZMA	Coastal Zone Management Act
D-4	Downtown Zone 4
D-4-R	Downtown Zone 4-R
D-5	Downtown Zone 5
D-5-R	Downtown Zone 5-R
DC HPO	District of Columbia State Historic Preservation Office
DCMR	District of Columbia Municipal Regulations
DCOP	District of Columbia Office of Planning
DCOZ	District of Columbia Office of Zoning
DCRA	District Department of Consumer and Regulatory Affairs
DDOE	District Department of the Environment (now known as DOEE)
DDOT	District of Columbia Department of Transportation

DMPED	Office of the Deputy Mayor for Planning and Economic Development
DOEE	District Department of Energy and Environment
DPW	District Department of Public Works
EA	Environmental Assessment
EMS	Emergency Medical Services
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act of 1973
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FY	Fiscal Year
GDP	Gross Domestic Product
GHG	Greenhouse gas
HPRB	District Historic Preservation Review Board
HVAC	Heating, Ventilation, and Air Conditioning
HSW	Historical Society of Washington, DC
HUD	U.S. Department of Housing and Urban Development
HVAC	Heating, Ventilation, and Air Conditioning
IPaC	Information for Planning and Conservation
LBP	Lead Based Paint
LED	Light-emitting Diode
MEP	Mechanical, Electrical, and Plumbing
MLK	Martin Luther King, Jr.
MU	Mixed-use zone
MWCOG	Metropolitan Washington Council of Governments
NAAQS	National Ambient Air Quality Standards
NCPC	National Capital Planning Commission
NEPA	National Environmental Policy Act
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NO_2	Nitrogen Dioxide
N_2O	Nitrous Oxide

NRHP	National Register of Historic Places
NRCS	Natural Resources Conservation Service
NWI	National Wetlands Inventory
O_3	Ozone
OMB	Office of Management and Budget
OSHA	Occupational Safety and Health Administration
Pb	Lead
PEPCO	Potomac Electric Power Company, Inc.
PLM	Polarized Light Microscopy
PM	Particulate Matter
PSA	Police Service Area
REC	Recognized Environmental Condition
RHS	Rainwater Harvesting System
SHPO	State Historic Preservation Office
SO_2	Sulfur Dioxide
SWMG	Stormwater Management Guidebook
SWMP	Stormwater Management Plan
TIF	Tax Increment Financing
UDC	University of the District of Columbia
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VOCs	Volatile Organic Compounds
WOUS	Waters of the U.S.
ZR	District of Columbia Zoning Regulations

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1. PURPOSE AND NEED FOR THE PROPOSED ACTION

1.1 WHAT IS BEING PROPOSED FOR THE CARNEGIE LIBRARY?

Events DC, the official convention and sports authority for the District of Columbia (DC), is proposing a rehabilitation of the Carnegie Library building at Mount Vernon Square (Reservation 8) in Washington, DC (see Figure 1-1). The proposed project is subject to the review of the National Capital Planning Commission (NCPC) under the National Capital Planning Act. Serving as the lead federal agency and in cooperation with Events DC, NCPC has prepared this Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality's (CEQ) Regulations for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508); NCPC's Environmental and Historic Preservation Policies and Procedures (69 FR 41229); and the National Capital Planning Act. NCPC is preparing this EA to ensure all environmental issues are identified and potential impacts are assessed before the Commission reviews and takes an action on an alternative for the rehabilitation and modernization of the Carnegie Library. Concurrently, NCPC is also conducting consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA).

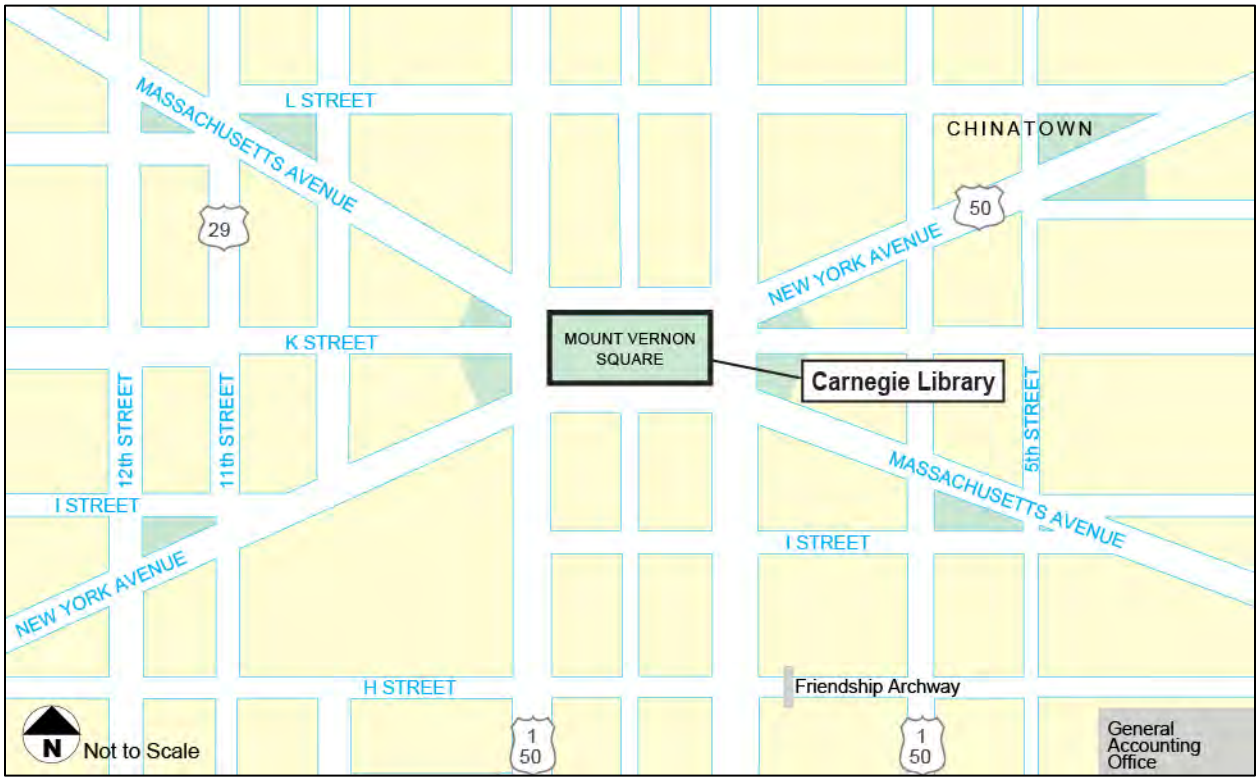


Figure 1-1. Project Location Map

1.2 WHAT IS THE PURPOSE OF THE PROPOSED ACTION?

The purpose of the proposed action is to rehabilitate and modernize the Carnegie Library to serve as a new city square for Washington, DC, where the community can come to learn, be entertained, and collaborate. The building would be leased jointly by the Historical Society of Washington, DC (HSW), which would continue to operate its research library, exhibit galleries, and administrative offices in the building; and a retail tenant who would operate a retail, events, and educational facility in the building.

1.3 WHY IS THE PROPOSED ACTION NEEDED?

The project is needed to address the deteriorating condition of the Carnegie Library and to expand the city's cultural offerings.

1.4 WHAT IS THE HISTORY OF THE CARNEGIE LIBRARY?

The DC Public Library System was officially established on June 3, 1896 by an Act of Congress. On January 2, 1899, industrialist and philanthropist Andrew Carnegie offered $250,000 (an amount later increased to $375,000) for the construction of a new library for the congressionally established Municipal Free Public Library. A design competition held later that year, mandated by Congress, awarded the library commission to the New York architecture and engineering firm of Ackerman & Ross. William Ackerman, a mechanical engineer, and Albert Randolph Ross, an École des Beaux Arts trained architect who previously worked at the firm of McKim, Mead and White, designed a classical Beaux-Arts library with an ornately carved marble exterior to be sited at the center of Mount Vernon Square.

The Library's cornerstone was laid on April 14, 1901, and the building was dedicated on January 7, 1903. Well received by the public, the new Library experienced demands that quickly exceeded both its capacity and staff. By the 1930s, the Central Public Library had outgrown its main library building, requiring several library operations to be moved off-site. Through the 1960s, several proposals were made in response to the Library's shortcomings including its expansion as well as the construction of a new library. The Central Public Library remained at Mount Vernon Square until the completion of their new facility, the Martin Luther King Jr. Memorial Library at 901 G Street, NW, on August 21, 1972.

Since its completion, the Carnegie Library has undergone several small- and large-scale renovations. Shortly after the Library's dedication in 1903, Carnegie donated additional funds to complete the building's unfinished interior, including interior painting and expansion of the stacks. From 1905 through 1962, several other changes were made, most notably the reconfiguration of the Delivery Room with the installation of a larger desk in 1907 and the enlargement of two rooms and the addition of mezzanines in two reading rooms, among other changes, in 1962.

The Library's two later tenants, the University of the District of Columbia (UDC) (1977-1990s) and HSW (1999-Present), each completed major rehabilitations. At the time UDC acquired the Library in 1977, it had been vacant for six years and was suffering from neglect. UDC's $4.2 million renovation included the reorientation of the building towards Mount Vernon Place, NW, with the construction of a new main entrance at the north elevation, the removal of book stacks, the addition of a large heat,

ventilation, and air conditioning (HVAC) unit, new lighting, the conversion of the former stack room and Lecture Hall into office space, removal of the Delivery Room counter, alteration of the west stairway in the northern portion of the building, and an additional layer of plaster onto the existing decorative plasterwork.

In 1999, Congress designated the Carnegie Library as the site for a city museum. HSW, which would operate the museum and house its administrative and research facilities in the former library, entered into a 99-year lease for the building. A comprehensive rehabilitation was undertaken to accommodate the City Museum, which opened in the spring of 2003. The project included: a newly constructed 150-seat theater in the east wing of the building; a permanent exhibit in the former west reading room on the first floor; new egress stairs and elevators; community galleries focusing on DC neighborhoods; two galleries, a public reading room, and a library on the second floor; and an archaeology lab, with classrooms and workshops in the basement. Though the City Museum only remained operational through November 2004, HSW remains in the building and continues to operate the library on an appointment basis.

Administrative Jurisdiction of Mount Vernon Square was transferred from the National Park Service to the District of Columbia when Congress authorized the Federal and District of Columbia Government Real Property Act of 2006. However, Mount Vernon Square remains owned by the United States government. In November 2011, Events DC, as an independent instrumentality of the District of Columbia, entered into an amended and reinstated lease with the Historical Society of Washington (HSW), for a portion of the building interior for a term of 87 years.

In 2013, Events DC in partnership with the International Spy Museum proposed to redevelop the Carnegie Library and Mount Vernon Square. This project did not move forward due to impacts to cultural resources.

1.5 PUBLIC AND AGENCY INVOLVEMENT

1.5.1 How Were the Public and Other Government Agencies Involved in the Development of this EA?

Public involvement and participation is an essential element of the NEPA and the NHPA processes by engaging citizens in the decision-making process through planning and development. NEPA regulations require an "early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action." To determine the scope of issues to be analyzed in depth for the project, NCPC announced a scoping period on April 23, 2017 that extended through May 23, 2017. NCPC announced the public scoping period for the project via electronic mail to federal and district agencies, community groups, and individuals. The email announcement provided a project overview and invited the public to attend a public scoping meeting on May 9, 2017 at the Carnegie Library.

Approximately 40 people attended the meeting, including Area Neighborhood Commission (ANC) representatives, the members of the HSW, and members of the public. Attendees were invited to submit comments on the project electronically through the NCPC website or by mailing written

comments to NCPC. Four formal written comments were provided by attendees at the scoping meeting.

During the public comment period, a total of four written comments were received. Overall, the correspondence that was received was in support of the rehabilitation of the Carnegie Library.

1.6 ENVIRONMENTAL ASSESSMENT PROCESS AND PROCEDURES

1.6.1 What is NEPA and the NEPA Process?

The NEPA process is intended to help public officials make decisions based on an understanding of environmental consequences, and to take actions that protect, restore, and enhance the environment. Decisions should be made based on accurate scientific analysis, expert agency comments, and public scrutiny of readily available environmental information. Federal agencies are obligated to follow the provisions of NEPA to identify and assess reasonable alternatives to the proposed action that would avoid or minimize any adverse effects upon the quality of the human environment before proceeding with the proposed action.

The level of NEPA analysis undertaken by an agency for a proposed action depends on the probable impacts. To determine the level of NEPA analysis required for the proposed rehabilitation of the Carnegie Library, NCPC examined potential impacts on the natural and human environment and considered the range of comments received during the scoping period. The impacts considered were based on reasonably foreseeable changes resulting from implementation of the proposed action. The following issues that could affect the environment and/or the proposed project were identified:

- Preservation of the historic significance of the Carnegie Library;
- Access to the Carnegie Library; and
- Landscaping.

Based on a review of reasonably foreseeable issues, significant impacts are not anticipated for the proposed rehabilitation of the Carnegie Library and therefore, NCPC has elected to prepare an EA for the proposed project. This EA evaluates the probability of impacts based on the reasonably foreseeable consequences of the proposed action and recommends measures to mitigate impacts, as appropriate.

1.6.2 What is Section 106 of the National Historic Preservation Act?

As with NEPA, Section 106 of the NHPA requires that federal agencies take into account the effects of their actions on historic properties. Under the NHPA, NCPC must evaluate impacts to any district, site, building, structure, or object listed in or eligible for listing in the National Register of Historic Places (NRHP) that may be affected by the proposed action. Chapter 3, Affected Environment and Impacts to the Human Environment, describes the potential impacts to historic resources.

Section 106 review encourages preservation of historic properties; however, at times, impacts to historic resources cannot be avoided. When the government must impact historic resources, they are required to consult with local and federal agencies responsible for historic preservation, local citizens, and groups with an interest in historic preservation. NCPC initiated consultation with the DC State Historic Preservation Office (DC HPO) for this project on April 21, 2017.

2. ALTERNATIVES INCLUDING THE PROPOSED ACTION

This section describes alternatives for meeting the purpose and need for the proposed action. One action alternative for the rehabilitation and exterior restoration of the Carnegie Library is being considered. The existing environment and potential impacts associated with the rehabilitation and exterior renovation are described in Chapter 3, Affected Environment and Impacts to the Human Environment.

2.1 WHAT IS BEING PROPOSED FOR THE CARNEGIE LIBRARY?

Events DC is proposing to rehabilitate the interior of the Carnegie Library and restore the exterior of the Library, located at Mount Vernon Square in Washington, DC. The proposed project includes restoration of the historic light well in the central atrium space and reconfiguration of the north entrance.

2.2 ALTERNATIVES GIVEN DETAILED CONSIDERATION

2.2.1 What is the No-Action Alternative and Why is it Considered?

The No-Action Alternative describes the action of continuing present management operations, conditions, and use. It does not imply the restriction of regular use and maintenance of the facility. The No-Action Alternative does not meet the Purpose and Need, but rather it is used as a basis from which to measure environmental consequences of the Action Alternatives.

Under the No-Action Alternative, Events DC would continue its existing use of the Carnegie Library and its current management and maintenance routine. The alternative proposes no rehabilitation to the Library or any exterior renovations (see Figure 2-1 and Figure 2-2). Although Events DC would address necessary repairs as they arise, there would be no general or comprehensive improvements made to the Library.

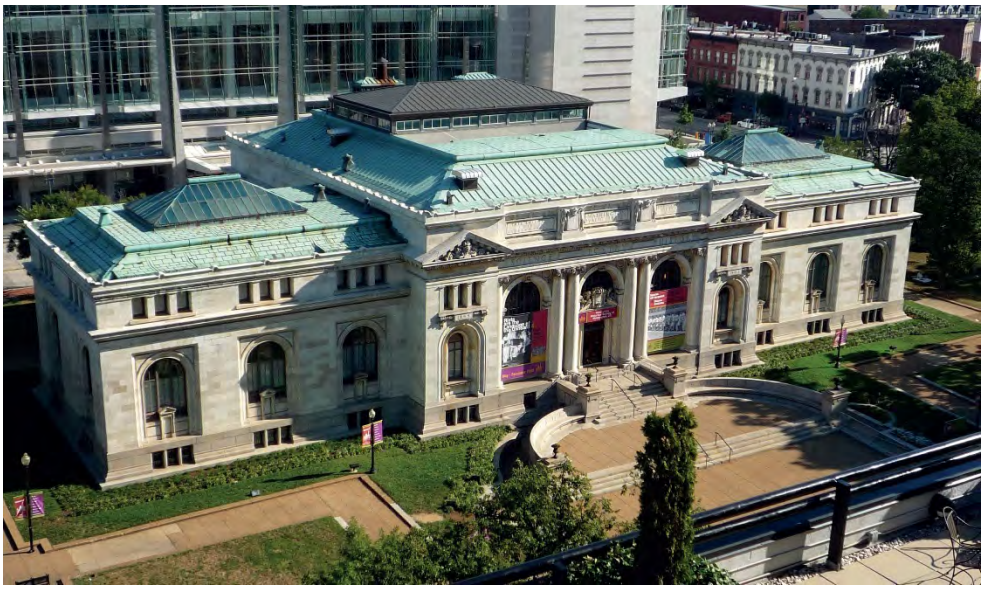


Figure 2-1. The Carnegie Library as it would appear under the No-Action Alternative (South Elevation)

Figure 2-2. The Carnegie Library as it would appear under the No-Action Alternative (North Elevation)

2.2.2 What Action Alternative is NCPC Evaluating in this EA (Alternative A)?

Under Alternative A, the Library would be leased jointly by HSW, which would continue to operate its research library, exhibit galleries, and administrative offices there, and a retail tenant, which would operate a retail, events, and educational facility in the building. The project would include a full restoration of the building exterior, including the repair and cleaning of the exterior stone, repair and retrofit of the original wood windows, repair and retrofit of the original skylight frames, and repair of the copper roof cladding. On the north side, the non-original stair and awning would be removed and replaced with a new stair that improves access to the building. Windows on this elevation—modified during the UDC and HSW rehabilitation projects— would be replaced or retrofitted (see Figure 2-3Figure 2-6).

The interior of the building would be rehabilitated, including removal of non-original infill construction throughout the building dating from the 2003 City Museum rehabilitation (see Figure 2-7Figure 2-4 through Figure 2-9Figure 2-9). The scope of this project included the enclosure of the central atrium with a museum gallery, offices, and clerestory extension with hipped roof. This addition would be removed, creating a central, skylit atrium space. The new atrium would be enclosed with a flat skylight, positioned below the existing roof line to obscure its visibility from the surrounding streetscape. Additionally, the mechanical, electrical, and plumbing (MEP) systems and other systems throughout the building would be upgraded or replaced.

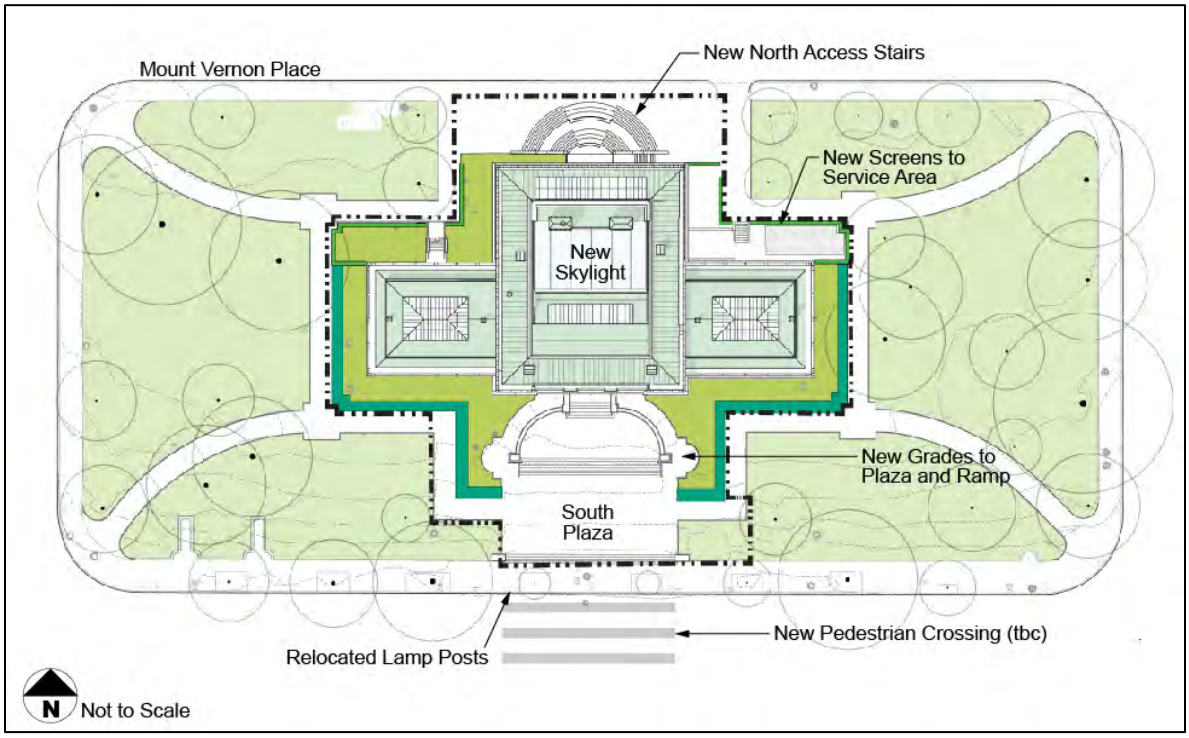


Figure 2-3. Proposed Building Exterior

Figure 2-4. Rendering of the Carnegie Library Under Alternative A (North Elevation)

Figure 2-5. Rendering of the Carnegie Library Under Alternative A (South Elevation)

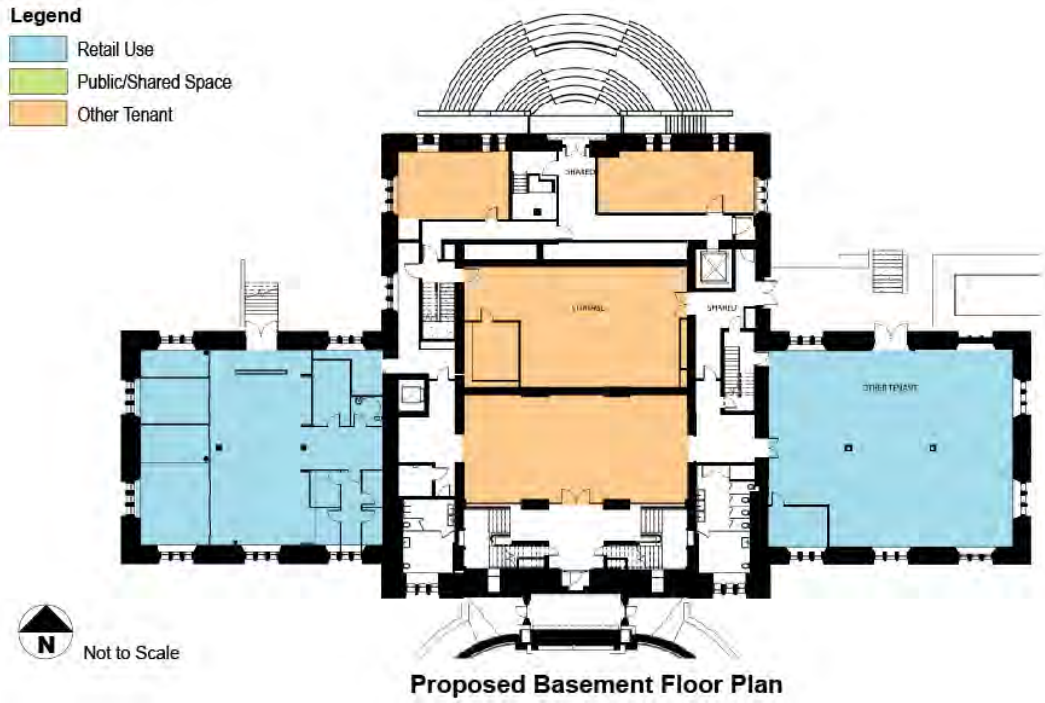


Figure 2-6. Proposed Basement Floor Plan

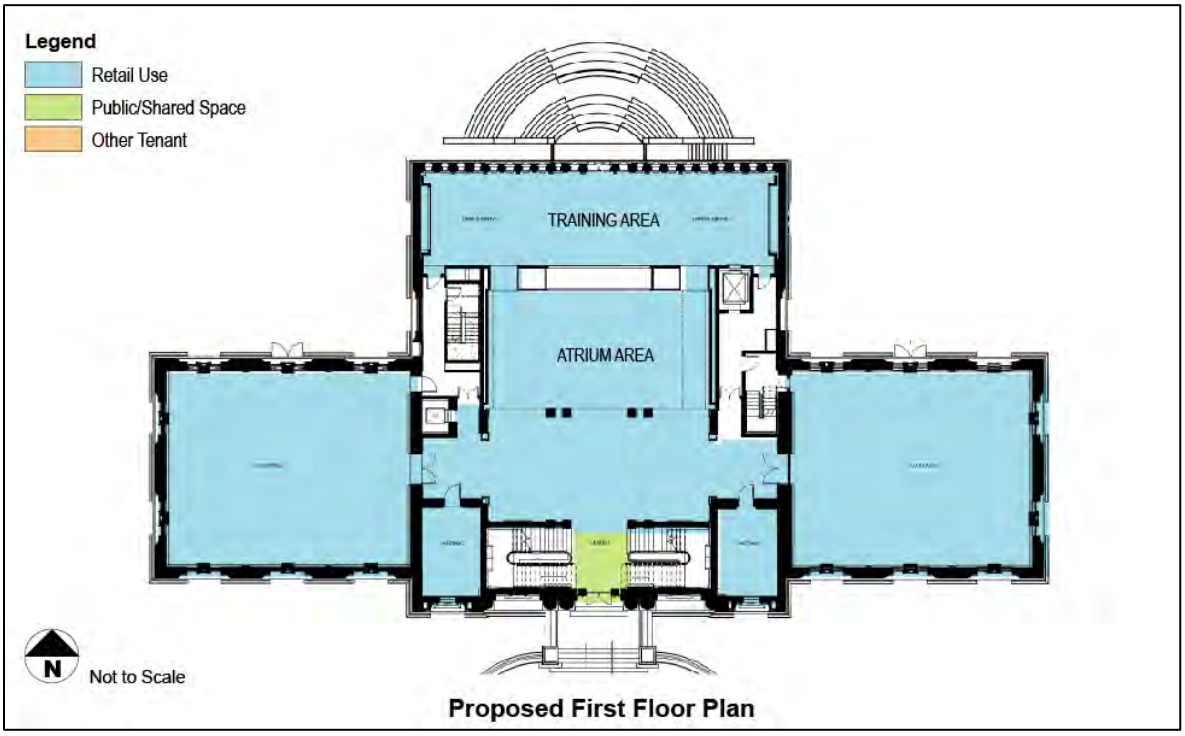


Figure 2-7. Proposed First Floor Plan

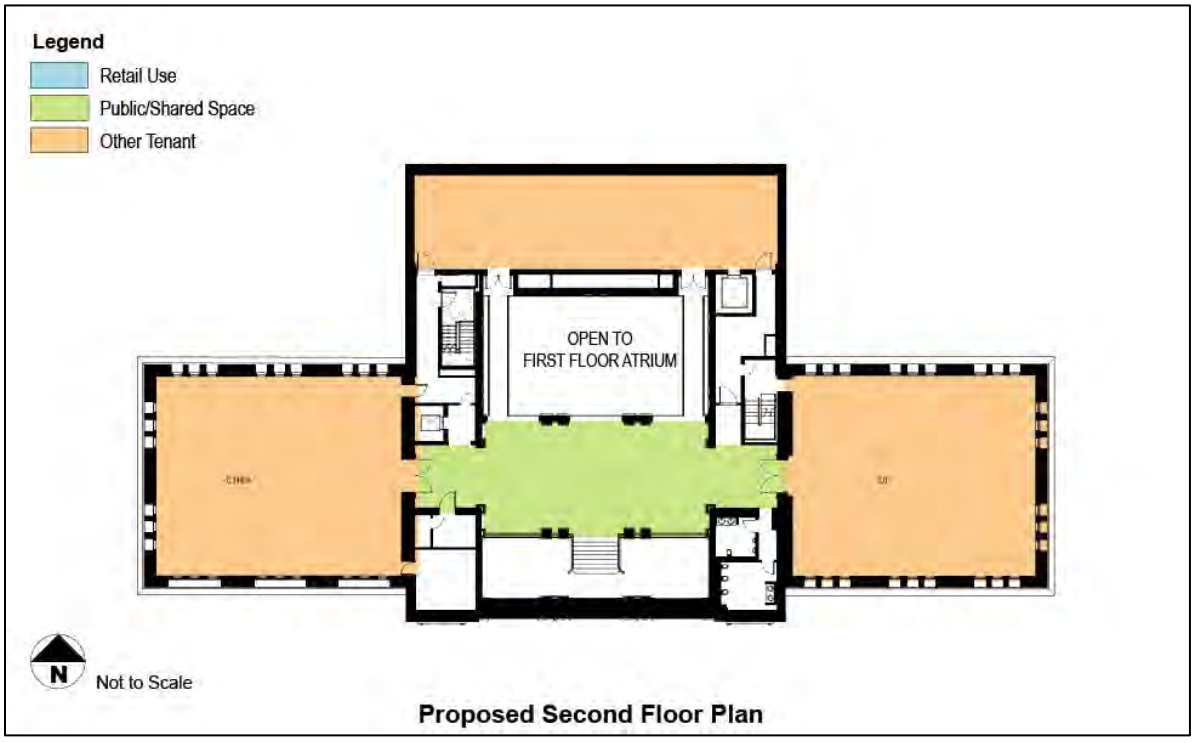


Figure 2-8. Proposed Second Floor Plan

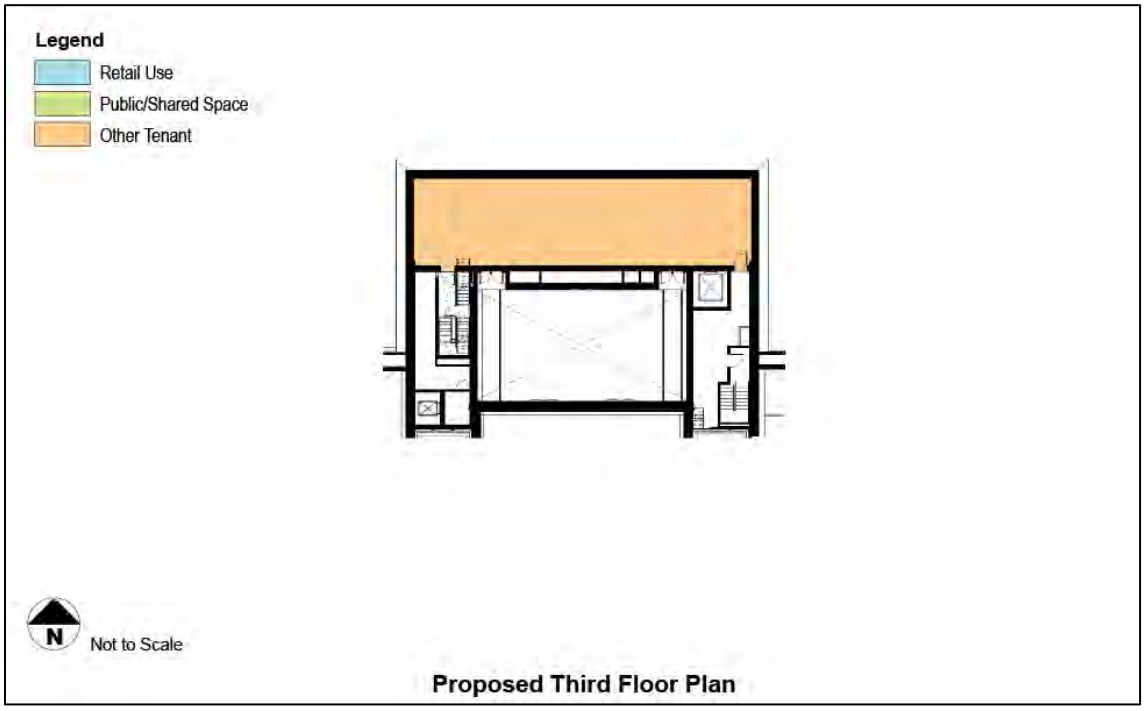


Figure 2-9. Proposed Third Floor Plan

2.3 WHAT OTHER ALTERNATIVES WERE CONSIDERED, BUT NOT STUDIED IN DETAIL?

In 2013, Events DC in partnership with the International Spy Museum proposed to redevelop the Carnegie Library and Mount Vernon Square. As part of this project, the following was proposed:

- State-of-the-art visitor center
- Enhanced quarters for the HSW
- Specialty retail
- Café
- New home for the International Spy Museum
- Special Events Spaces

This project was dismissed from further consideration due to the impacts the project would have on cultural resources.

2.4 WHAT ARE THE IMPACTS FROM EACH ALTERNATIVE?

Table 2-1 presents, for comparison purposes, a concise summary of the No-Action and the Action Alternatives' potential impacts by resource topic.

Table 2-1. Summary of Potential Impacts by Resource Topic

Resource	No-Action Alternative	Action Alternative (Alternative A)
Cultural Resources	This alternative proposes no alterations to the site or the building interior or exterior. Based on these factors, the No Action Alternative would result in negligible adverse impacts to the Carnegie Library, Mount Vernon Square, or other historic resources within the APE. For purposes of Section 106 of the NHPA, there would be no adverse effect on historic properties. The No Action Alternative would have no impacts to potential archaeological resources in the APE. For the purposes of Section 106 of the NHPA, there would be no adverse effect on these resources.	Minor alterations are being proposed to the site paving, grading, and vegetation to meet stormwater management and accessibility requirements. These alterations have no potential to cause an adverse impact to the Carnegie Library; however, there would be a minor, long-term, adverse impact to Mount Vernon Square. For purposes of Section 106 of the NHPA, there would be no adverse effect on historic properties as a result of the site improvements. The repair and retrofit of exterior architectural elements and the removal of non-original additions would create a minor, long-term, adverse impact to the Carnegie Library, which would constitute an adverse effect under Section 106 of the NHPA. However, it would not affect the character or integrity of Mount Vernon Square or other historic resources within the APE. The replacement in-kind of deteriorated stone pediments, will require additional analysis to determine whether it constitutes a long-term, adverse, impact. The creation of a central atrium in the building would result in a minor, long-term, adverse impact to the Carnegie Library and would constitute an adverse effect under Section 106 of the NHPA. However, the interior renovations have no potential to adversely impact Mount Vernon Square or other historic resources in the APE. The proposed action has the potential to disturb identified archaeological resources in the northeast and east quarters of the square. Depending on the significance of the resources when evaluated for listing in the National Register of Historic Resources (NRHP) under Section 106 of the NHPA, impacts could constitute an adverse effect. Alternatively, if the limited ground-disturbance envisioned is confined to the identified fill deposits, there would be no impact to the identified archaeological resources.

Resource	No-Action Alternative	Action Alternative (Alternative A)
Transportation	Two intersections during the PM peak hour and all intersections during the Saturday peak hour currently operate at an overall LOS D or better. These LOSs would continue under the No Action Alternative resulting in a moderate, long-term adverse impact to the local roadway network. No impacts to the pedestrian, bicycle, public transit, or parking facilities would occur.	With the addition of a retail space inside the Carnegie Library, there would be a small increase (approximately three percent) in vehicular traffic generated by retail sales, deliveries, and special events. There would be no change in the level of service between the No Action Alternative and the Action Alternative. All study area intersections would continue to operate at an overall LOS E or F during the PM peak hour. Because Alternative A would only add a small amount of traffic to already failing intersections, Alternative A would have a negligible, adverse impact to the roadway network. However, it is important to note that most of the study area roadways are at or over capacity, and, therefore, even small additions to vehicular volume result in exponential increases in delay. No impacts to the pedestrian, bicycle, public transit, or parking facilities would occur.
Economy, Employment, and Income	No new employment opportunities would be created. HSW would continue to lease office space from Events DC in the building. Events DC would continue to generate revenue through special event rentals. The trend of economic growth within the Mount Vernon Square and Shaw neighborhoods would likely continue in accordance with the District's plans and goals for revitalization. Therefore, there would be a long-term, beneficial impact to the local and regional economy, taxes, and revenue, and no impacts to employment.	The addition of a new retail tenant in the Carnegie Library would create approximately 100 permanent jobs for DC area residents and contribute to the current trend of economic growth in the Mount Vernon Square and Shaw neighborhoods. The addition of a retail tenant would remove several event spaces. However, it is anticipated that the new tenant would provide some compensation to Events DC at the beginning of the lease to offset the estimated lost revenue from special events. The retail tenant would pay DC business taxes and generate increased revenue for the District from sales taxes. Employees of the retail store would pay income taxes. Most of the renovation costs would be incurred by the new tenant, so no taxpayer dollars would be required. Overall, the Action Alternative would result in a minor, long-term, direct, beneficial impact to Economy, Employment, and Income.

Resource	No-Action Alternative	Action Alternative (Alternative A)
Community Facilities and Services	No improvements would be made to the building. HSW would continue to lease their existing spaces and provide research and education opportunities at the Carnegie Library. Events DC would continue to host special events, and no changes to the amount of available rental space would occur. No changes in building usage would occur; therefore, no increase in emergency services would be required and no increase in police or fire and EMS response times is anticipated. The No-Action Alternative would not result in the removal or alteration of any adjacent properties or facilities. Therefore, the No-Action Alternative would have no impact on community facilities and services.	The rehabilitation and modernization of the Carnegie Library would remove several event spaces. However, Events DC would still have rights to use non-retail areas of the Library for special events and meetings. HSW would continue to lease their existing spaces and provide research and education opportunities for the duration of their 99-year lease. The new retail tenant would provide new community services and events, such as concerts, forums, and children's events at the Carnegie Library. The proposed project would not result in any permanent changes to traffic volumes or patterns. No impacts to police or fire and EMS response times are anticipated. The proposed project would not result in the removal or alteration of any adjacent properties or facilities. Overall, Alternative A would result in minor, long-term, direct, beneficial impacts to community facilities and services. HSW and the Kiplinger Research Library would be temporarily relocated during construction. The temporary location for HSW has not yet been determined. Some temporary impacts related to construction noise, sidewalk closures, and partial road closures may affect places of worship, businesses, and public facilities in the vicinity of the project. These impacts would be short-term and would only occur during construction hours – Monday through Saturday from 7 am to 7pm. Therefore, the Action Alternative would result in minor, short-term, direct, adverse impacts to community facilities and services.

Resource	No-Action Alternative	Action Alternative (Alternative A)
Environmental Contamination and Hazardous Materials	No subsurface excavation or ground disturbance would occur; therefore, the likelihood of encountering contaminated soil or groundwater is negligible. If ACM or LBP are to be disturbed, then they would be abated in accordance with Subpart M of the EPA NESHAPS regulations, the OSHA Asbestos Standard for the Construction Industry, and the OSHA Lead in Construction Standard. The additional mold that has been identified in the building would be removed by a DC licensed mold professional to the standards set by DC and federal regulations to safeguard the health of building occupants. Therefore, the No-Action Alternative would have a minor, long-term, beneficial impact related to environmental contamination.	Hazardous materials remediation would be performed as part of the overall rehabilitation and modernization of the Carnegie Library. ACM and LBP would be abated in accordance with Subpart M of the EPA NESHAPS regulations, the OSHA Asbestos Standard for the Construction Industry, and the OSHA Lead in Construction Standard, which include remediation practices designed to avoid and minimize the exposure of construction personnel to air toxics. The additional mold that has been identified in the building would be removed by a DC licensed mold professional to the standards set by DC and federal regulations to safeguard the health of building occupants. Construction and demolition activities may generate other hazardous wastes from painting, carpentry, and vehicle and equipment maintenance. Therefore, the project would require registration with DOEE as a Hazardous Waste Generator. Because of the disturbance to hazardous building materials and the potential to generate other hazardous wastes during demolition, Alternative A would have a minor, short-term, direct, adverse impact during construction. However, the removal of hazardous building materials from the Carnegie Library would overall result in a moderate, long-term, direct, and beneficial impact related to environmental contamination and hazardous materials.

2.5 WHAT MITIGATION MEASURES WOULD BE IMPLEMENTED FOR THIS PROJECT?

To help ensure the protection of natural and historic resources and the quality of the human environment, the following protective measures shown in Table 2-2 would be implemented by Events DC. Events DC, through coordination with NCPC, would implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

Table 2-2. Summary of Mitigation Measures

Resource	Mitigation Measures
Stormwater Management	A Storm Water Management Plan (SWMP) would be prepared and submitted to DOEE for approval prior to construction. A combination of rainwater harvesting, bioretention plantings, and permeable pavement would be installed onsite. The existing sand filter system would be replaced with a Rainwater Harvesting System (RHS), and collected rainwater would be treated and reused for spray irrigation purposes.
Air Quality	Short-term construction impacts would be mitigated through the use of proper control measures including maintenance of emission controls on all construction equipment and covering/wetting exposed soils to reduce fugitive dust.
Cultural Resources	The Section 106 consultation process is ongoing. NCPC, Events DC, DC HPO would agree upon mitigation measures that would be implemented in accordance with an agreement document developed to resolve the Section 106 process. The Section 106 agreement document would identify these mitigation measures and stipulate that consultation would continue through the design and construction processes.
Transportation	These measures should be considered preliminary as improvement may be made to the study area transportation network as part of other DOT projects – • All study area signalized intersection should be upgraded to be fully actuated and optimize phasing and offsets. • Parking along one side of K Street should be removed to provide an exclusive left turn lane on WB K Street at the intersection of 9th Street with New York Avenue NW. Revise the phasing to include a protected/permitted WB left turn. It may be possible provide a shift in the through lanes to avoid a complete removal of on-street parking. • On-street parking on one side of K Street should be removed to provide an exclusive left turn lane on EB K Street at the intersection of 9th Street with New York Avenue, NW. It may be possible provide a shift in the through lanes to avoid a complete removal of on-street parking • Addition of bike racks
Economy, Employment, and Income	The proposed retail tenant would provide compensation to Events DC at the beginning of the lease to offset the estimated lost revenue from special events.
Community Facilities and Services	HSW and the Kiplinger Research Library would be temporarily relocated during construction. The temporary location for HSW has not yet been determined. Construction activities for the rehabilitation and modernization of the Carnegie Library would only occur during construction hours – Monday through Saturday from 7am to 7pm, as designated by DCRA (DCRA, 2017). However, if construction would need to occur after hours an after-hours permit would be obtained.

Resource	Mitigation Measures
Environmental Contamination	ACM and LBP would be abated and handled in accordance with Subpart M of the EPA NESHAPS regulations (40 CFR 61), the OSHA Asbestos Standard for the Construction Industry (29 CFR 1962.1101), and the OSHA Lead in Construction Standard (29 CFR 1926.62). Mold that has been identified in the building would be removed by a DC licensed mold professional to the standards set by DC and federal regulations to safeguard the health of building occupants. The project would be registered with DOEE as a Hazardous Waste Generator prior to construction. Hazardous materials used during construction would be stored onsite in a designated area and disposed of in accordance with DCMR Title 20, Chapters 42-43.

3. AFFECTED ENVIRONMENT AND IMPACTS TO THE HUMAN ENVIRONMENT

3.1 WHAT IS THE AFFECTED ENVIRONMENT AND HOW ARE IMPACTS EVALUATED?

This chapter of the EA describes the existing conditions of the human environment at the Carnegie Library site and the impacts of modernizing the Carnegie Library. Each of the alternatives described in Chapter 2 would have varying impacts to natural resources, the social and economic environment, historic resources, and infrastructure (the transportation network and utilities).

Impacts can occur during construction as well as operation of the Carnegie Library. Impacts can also occur both directly, as well as indirectly or off site. Impacts can be cumulative when the Carnegie Library rehabilitation and modernization project is considered with other past, present, and future projects.

Potential impacts are described in terms of:

- Intensity – are the effects negligible, minor, moderate, or major
- Type – are the effects beneficial or adverse;
- Duration – are the effects short-term, lasting through construction or less than one year, or long-term, lasting more than one year; and
- Context – are the effects site-specific, local, or even regional.

For the majority of resource areas, the thresholds for the intensity of impacts are defined as follows:

- Negligible, when the impact is localized and not measurable at the lowest level of detection;
- Minor, when the impact is localized and slight, but detectable;
- Moderate, when the impact is readily apparent and appreciable; or
- Major, when the impact is severely adverse, significant, and highly noticeable.

The effects on the human environment were assessed using best available scientific studies, guidance document and information. Resources used to analyze the impacts were obtained from federal, state, and local agencies. These include, but are not limited to, the following:

- U.S. Environmental Protection Agency (EPA) analyses and reports
- U.S. Department of Agriculture (USDA) NRCS Soil Surveys
- Federal Emergency Management Agency (FEMA) Floodplain Maps
- U.S. Fish and Wildlife Service (USFWS) threatened and endangered species lists
- Environmental Site Assessments
- District Agencies
- Metropolitan Washington Council of Government (MWCOG) reports

A complete list of references is included at the end of this EA.

3.2 CUMULATIVE IMPACTS ANALYSIS METHOD

The CEQ regulations to implement NEPA require the assessment of cumulative impacts in the decision-making process for federal projects. Cumulative impacts are defined as “the impact on the environment which results from the incremental impact of the action when added to other past,

present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions" (40 CFR 1508.7). As stated in the CEQ handbook, "Considering Cumulative Effects" (CEQ, 1997), cumulative impacts need to be analyzed in terms of the specific resource, ecosystem, and human community being affected and should focus on effects that are truly meaningful. Cumulative impacts are considered for all alternatives, including the No-Action Alternative.

The methodology for determining cumulative effects is derived from using an "X+Y=Z" analysis where "X" represents the impacts of the alternative and "Y" is other past, present, and reasonably foreseeable future actions. When considered relative to each other, their combined contribution to the overall cumulative effect is "Z." It is important to note that, due to the disparate scale and location of the proposed actions, effects from certain proposed actions could be moderate, but, when considered in the overall context, could constitute a relatively small incremental portion of the project area and contribute to a collective minor effect.

The analysis of cumulative impacts was accomplished using four steps:

Step 1: Identify Resources Affected – Fully identify resources affected by any of the alternatives. These include the resources addressed as impact topics in Chapters 3 of the document.

Step 2: Set Boundaries – Identify an appropriate spatial and temporal boundary for each resource. The spatial boundary for each resource topic is listed under each topic.

Step 3: Identify Cumulative Action Scenario – Determine which past, present, and reasonably foreseeable future actions to include with each resource. These are described in Table 3-1.

Step 4: Cumulative Impact Analysis – Summarize impacts of these other actions (X) plus impacts of the proposed action (Y), to arrive at the total cumulative impact (Z). This analysis is included for each resource in Chapter 3.

Table 3-1 provides a brief description of each of the projects used in the cumulative impacts analysis.

Table 3-1. Cumulative Impacts Projects or Actions

Cumulative Impact Projects	Description	Status
900 New York Avenue Office	Approximately 10-acre development including office, retail, residential, and hotel space.	Future
1000 F Street Office	92,160-square foot commercial building offering office and retail space.	Ongoing
900 G Street Office	113,000-square foot commercial building.	Past
MLK Library Rehabilitation and Modernization – 901 G Street, NW	Rehabilitation of the MLK Jr. Library and 5th floor addition	Ongoing

3.3 WHAT IMPACT TOPICS HAVE BEEN ELIMINATED FROM FURTHER ANALYSIS?

As with any environmental analysis, there are resource issues that are dismissed from further analysis because the proposed action would cause a negligible or no impact. Negligible impacts are

effects that are localized and immeasurable at the lowest level of detection. Therefore, these topics are briefly discussed and then dismissed from further consideration or analysis. These resources are:

- Geology, Topography, and Soils
- Vegetation and Wildlife
- Threatened and Endangered Species
- Water Resources
    - Stormwater
    - Surface Water and Wetlands
    - Floodplains
    - Coastal Zone Management
- Air Quality
- Climate Change
- Noise
- Land Use Planning and Zoning
- Population and Housing
- Environmental Justice
- Utilities
- Waste Management
- Safety and Security

3.3.1 Geology, Topography and Soils

The project area is located within the Atlantic Coastal Plain Physiographic Province (USGS, 1994), and is shown on the Washington West USGS 7.5-minute topographic quadrangle (Figure 3-1). Topography is generally flat and slopes gently to the southeast, between 60 and 66 feet above sea level. Soils at the proposed project site consist entirely of urban fill and udorthents, a highly disturbed composite soil type. All soils onsite have been previously disturbed. With the exception of minor alterations to site hardscape elements to comply with accessibility and other code requirements, the project is generally limited to the building itself and no new ground disturbance is proposed. Therefore, geology, topography, and soils have been dismissed from further analysis.

3.3.2 Vegetation and Wildlife

The Carnegie Library site is fully developed and landscaped with ornamental vegetation consisting of both native and exotic species. Eight deciduous street trees, primarily elms, are planted approximately every 50 feet along K Street, NW. The site is in a fully developed urban area. This environment may provide habitat for urban birds such as pigeons and sparrows. No natural vegetation exists onsite.

With the exception of minor alterations to landscaping and hardscape elements, the project is limited to the building itself. No permanent impacts to existing vegetation or habitat are proposed. Therefore, vegetation and wildlife have been dismissed from further analysis.

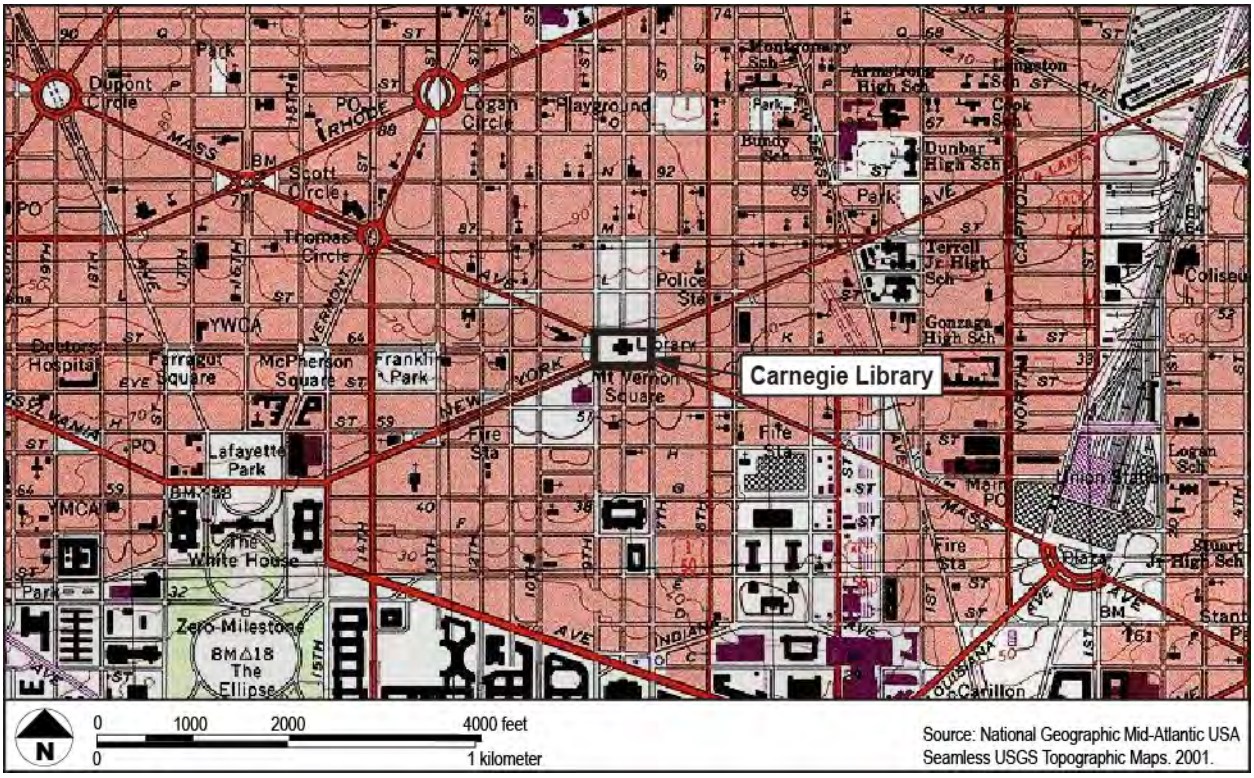


Figure 3-1. USGS Topographic Map

3.3.3 Threatened and Endangered Species

The federal Endangered Species Act (ESA) of 1973, administered by the U.S. Fish and Wildlife Service (USFWS), aims to protect and recover imperiled species and the ecosystems upon which they depend. Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. Under Section 7 of the ESA, federal agencies are required to consult with USFWS to ensure that their actions do not adversely affect listed species.

On behalf of NCPC, Stantec consulted the USFWS Information for Planning and Conservation (IPaC) system in compliance with Section 7 of the ESA. No threatened or endangered species or critical habitats were identified in the vicinity of the project area. The existing site consists of an urban landscape with no natural vegetation, which is unlikely to provide valuable habitat. Due to the lack of listed species or habitat within the project area, threatened and endangered species have been dismissed from further analysis.

3.3.4 Water Resources

3.3.4.1 Stormwater

The DC governing body for stormwater management is the Stormwater Management Section of the DOEE. The DC Storm Water Management Regulations (DCMR Title 21, Chapter 5) were established

in 1988 and revised in 2013 (2013 Stormwater Rule). The District also adopted a new Stormwater Management Guidebook in 2013 (SWMG; DOEE/CWP, 2013). The 2013 stormwater rule emphasizes on-site volume retention, which can be managed through runoff prevention (e.g., conservation of pervious cover or reforestation), runoff reduction (e.g., infiltration or water reuse), and runoff treatment (e.g., plant/soil filter systems or permeable pavement). According to the 2013 rule, regulated sites that undergo a major land-disturbing activity must employ Best Management Practices (BMPs) and post-development land cover necessary to retain onsite at least 50 percent of the stormwater runoff from a 1.2-inch rainfall event. The remaining runoff can be retained off-site if necessary. The proposed project meets the definition of a major land-disturbing activity, defined in the 2013 Stormwater Rule as an "activity that disturbs…five thousand square feet or greater of land area" (DCMR 21-599.1).

The Carnegie Library is within DC Water's Combined Sewer System (CSS) and therefore, both sanitary sewer lines and stormwater lines connect to the same discharge system. During extreme stormwater events, if the system becomes overloaded, combined sewer overflows (CSOs) may discharge directly into the Potomac River, negatively impacting water quality. Stormwater management onsite is currently provided via a sand filter, located adjacent to the building to the southwest.

A combination of rainwater harvesting, bioretention plantings, and permeable pavement are being proposed to achieve the retention requirements (Figure 3-3). By replacing 450 square feet of existing sidewalk with permeable pavement, the proposed project would reduce the amount of impervious surface on the site. The existing sand filter system would be replaced with a Rainwater Harvesting System (RHS), and collected rainwater would be treated and reused for spray irrigation purposes. Using these methods, the proposed project would be able to retain 100 percent of the stormwater volume onsite from a 1.2-inch rainfall event, which exceeds DOEE standards for major land-disturbing activities. A Storm Water Management Plan (SWMP) would be prepared and submitted to DOEE for approval in accordance with the 2013 Stormwater Rule. Due to the reduction in impervious surface and the achievement of 100 percent onsite retention, the proposed project would have a negligible, long-term, direct, beneficial impact to stormwater management. Therefore, stormwater management has been dismissed from further analysis.

3.3.4.2 Surface Water and Wetlands

The Environmental Protection Agency (EPA) and the U.S. Army Corps of Engineers (ACOE) are responsible for enforcing certain provisions of the Clean Water Act (CWA) (33 U.S.C. §1251 et seq.) which was enacted by Congress "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters," including wetlands and Waters of the U.S. (WOUS). One of the mechanisms adopted by Congress to achieve that purpose is a prohibition on the discharge of any pollutants, including dredged or fill material, into wetlands or WOUS except in compliance with other

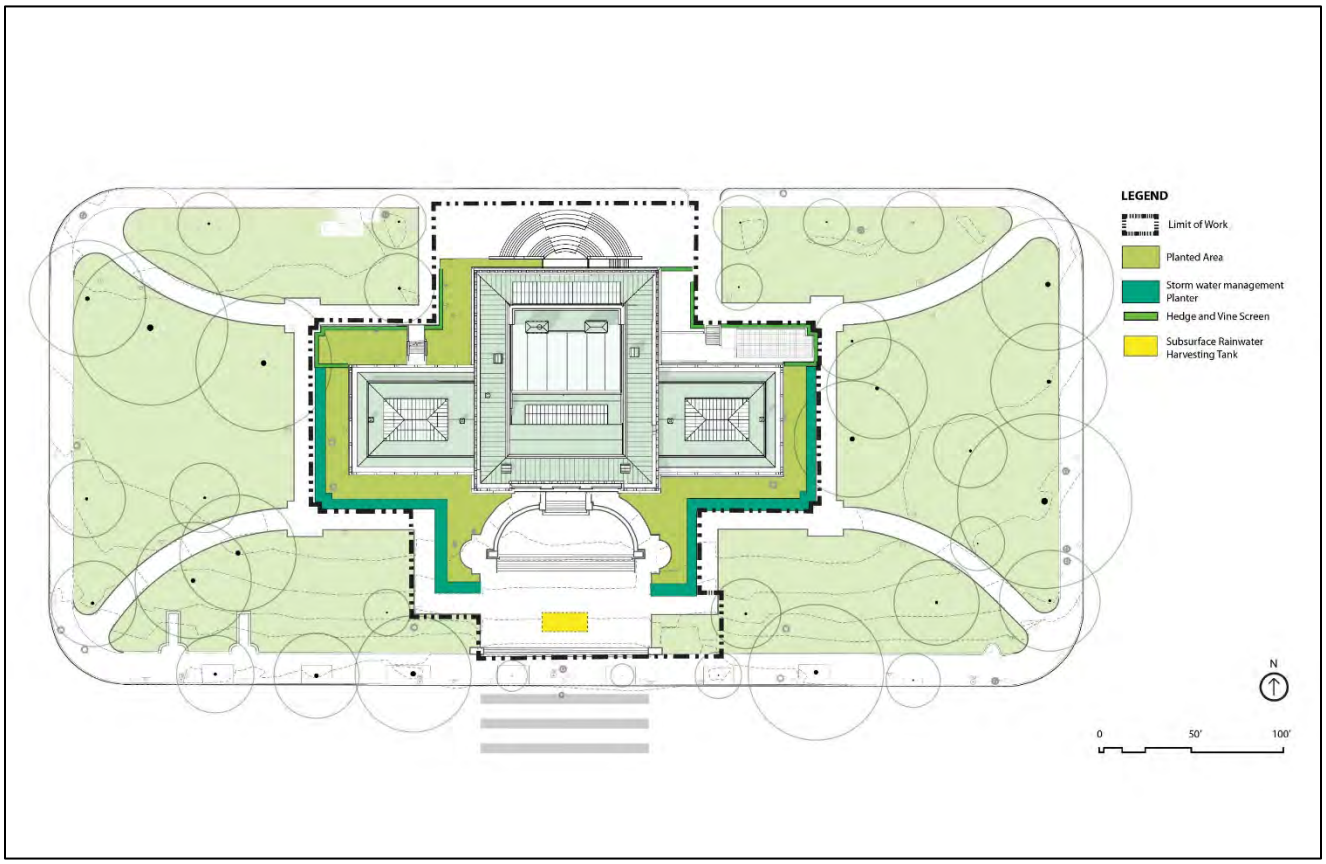


Figure 3-2: Proposed Landscaping Plan

specified sections of the Act. In most cases, this means compliance with a permit issued pursuant to CWA §402 or §404. The CWA defines the term "discharge of a pollutant" as "any addition of any pollutant to navigable waters from any point source" and provides that "[t]he term 'navigable waters' means the waters of the United States, including the territorial seas [,]" (33 U.S.C. §1362(7), 33 C.F.R. §328.3(a), and 40 C.F.R. §230.3(s)). Discharges of dredged or fill material into wetlands and WOUS require a permit from the ACOE.

The ACOE defines wetlands as "areas saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for line in saturated soil conditions" (33 CFR 328.3). Wetlands generally include swamps, marshes, bogs, and similar areas. The technical approach for the identification and delineation of wetlands is that, except in certain abnormal situations, evidence of a minimum of one positive wetland indicator from each parameter (hydrology, soil, and vegetation) must be found in order to make a wetland determination.

A desktop review of USFWS National Wetland Inventory (NWI) mapping, topographic mapping, soils data, and the DOEE Map of Known Wetlands within the District (DDOE WQD, 2001) indicated that no wetlands or WOUS are present onsite. According to the Natural Resources Conservation Service

(NRCS) Web Soil Survey, soils at the proposed project site consist entirely of urban fill (NRCS, 2017). All soils onsite have been previously disturbed.

Due to the absence of wetlands or water resources on the site, surface waters and wetlands have been dismissed from further analysis.

3.3.4.3 Floodplains

Federal activities within floodplains must comply with Executive Order (EO) 11988: Floodplain Management, 33 C.F.R. 1977; and EO 13690: Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input. Per these executive orders, federal agencies are required to avoid adverse effects associated with the occupancy and modification of floodplains to the extent possible, thereby minimizing flood risk and risks to human safety (FEMA, 2006).

The Carnegie Library is located outside the 100-year and 500-year floodplains (Zone X) as depicted on the Flood Insurance Rate Map (FIRM) number 1100010019C, effective September 27, 2010 (see Figure 3-4).

Because the proposed project is located outside the floodplain, the project is not expected to have a measurable effect on the frequency, elevation, intensity, or duration of floods, nor would it impact floodplain function. Therefore, floodplains were dismissed from further analysis within this EA.

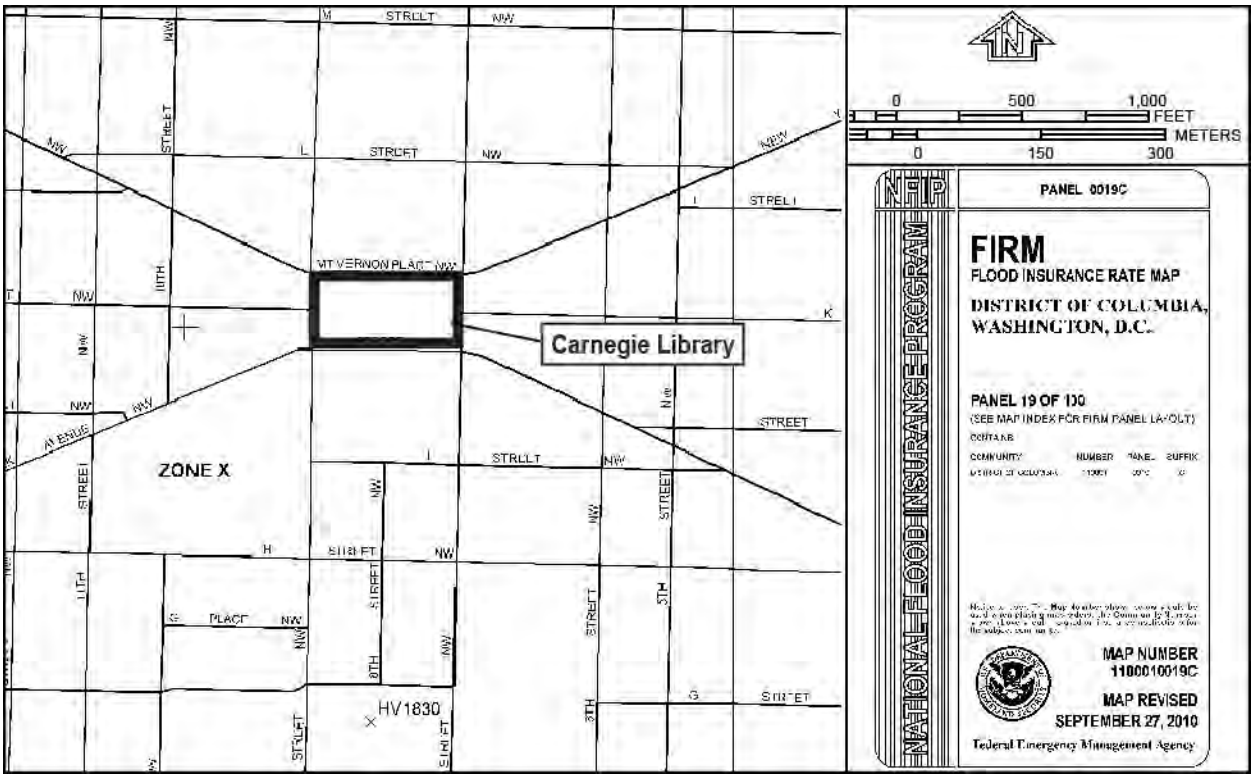


Figure 3-4. FEMA Flood Insurance Rate Map

3.3.4.4 Coastal Zone Management

The Federal Coastal Zone Management Act of 1972 (CZMA) encourages states to "preserve, protect, develop, and where possible, restore or enhance the resources of the nation's coastal zone" (16 U.S.C. § 1456). All federal development projects inside the coastal zone must comply with Section 307 of the CZMA. The District of Columbia does not currently participate in the National Coastal Zone Management Program. Therefore, the CZMA does not apply and coastal zone management has been dismissed from further analysis.

3.3.5 Air Quality

Under the authority of the Clean Air Act (CAA) (U.S.C. Title 42, Chapter 85, 1970, as amended in 1990), the EPA has developed National Ambient Air Quality Standards (NAAQS) for certain air pollutants (criteria pollutants) deemed harmful to public health and the environment. These criteria pollutants include: nitrogen dioxide (NO_2), sulfur dioxide (SO_2), carbon monoxide (CO), ozone (O_3), particulate matter (PM2.5/PM10), and lead (Pb). The EPA designates areas where ambient concentrations are below the NAAQS as being in "attainment" and designates areas where a criteria pollutant level exceeds the NAAQS as being in "nonattainment." According to the EPA Green Book, as of February 13, 2017, the Washington, DC Metro Area is in nonattainment for ozone (EPA, 2017). In the area surrounding the Carnegie Library, ozone is generated primarily from vehicle traffic. Vehicle emissions contain volatile organic compounds (VOCs), which are a precursor to ozone. Ozone is formed when sunlight and high temperatures cause a photochemical reaction between VOCs and nitrogen oxides in the air. Excess nitrogen oxide in the atmosphere can result from agricultural, industrial, or wastewater management processes, or fuel combustion.

The Carnegie Library currently holds a DOEE air quality permit to operate a diesel-powered, 100-kWe emergency generator. No permit violations have been reported. The generator would be replaced with a battery operated generator. Given the availability of public transit and limited parking in the area, the proposed project is not likely to greatly increase the number of vehicles coming to the Library and no increases in traffic are expected. During construction, construction vehicles and equipment may temporarily generate fugitive dust and carbon emissions. These impacts would be temporary and negligible. Short-term construction impacts would be mitigated through the use of proper control measures including maintenance of emission controls on all construction equipment and covering/wetting exposed soils to reduce fugitive dust. Therefore, air quality has been dismissed from further analysis.

3.3.6 Climate Change

Greenhouse gas (GHG) emissions, released from activities that involve the combustion of fossil fuels, are widely recognized as the main contributing factor to climate change. GHGs such as carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4) absorb and trap heat that is radiated by the earth, preventing it from escaping into the atmosphere. The result is a change in global temperatures and can also cause changes to patterns and intensities of precipitation, increased frequency and magnitude of severe weather, and/or sea level rise (EPA, 2017). In 2015, President Obama issued EO 13693, Planning for Federal Sustainability in the Next Decade, which directs Federal agencies to reduce GHG emissions by 40 percent below 2008 levels by 2025 and to increase renewable energy

usage to 25 percent of total consumption by 2025 (The White House, 2015). Additionally, DC has set a goal to reduce GHG emissions by 50 percent below 2006 levels by 2032 and by 80 percent by 2050 (DOEE, 2010).

Given the availability of public transit and limited parking in the area, the proposed project is not likely to greatly increase the number of vehicles coming to the Library. During construction, emissions of nitrous oxides and carbon dioxide from the burning of fuel in vehicles and equipment could result in incremental increases in greenhouse gases that contribute to global climate change. However, these short-term impacts would be negligible in comparison to other local and regional sources of greenhouse gas emissions. The project would likely involve some or all of the following energy efficiency improvements: LED lighting, retro-commissioning of building controls, energy modeling, introduction of natural ventilation and operable windows, high-efficiency boiler and water heater, and upgraded HVAC systems. Construction materials would be locally sourced when possible, which would minimize fossil fuel usage during transport. These upgrades and use of renewable energy would result in a long-term, beneficial impact. Because there would be a slight beneficial impact, climate change has been dismissed from further analysis.

3.3.7 Noise

The EPA defines noise pollution as "unwanted or disturbing sound" and noise pollution is regulated under the Noise Control Act of 1972 (EPA, 2016b). Noise is measured in decibels on the A weighted scale (dBA) which represents the range of sounds that can be heard by the human ear. The EPA has declared sound in excess of 55 dBA to be "normally unacceptable" for sensitive populations such as schools and residences. The Carnegie Library is located in an urban area within Washington, DC and is surrounded by other commercial buildings, retail space, and the Washington Convention Center. The typical noise level for urban areas is approximately 70 dBA and can temporarily reach up to 120 dBA due to sirens and other loud vehicles (EPA, 1971). Common urban noise levels are listed in Table 3-2.

Table 3-2: Common urban noise levels (Earth Journalism Network, 2014)

Noise Sources	dBA
Normal Conversation	60
Moderate Traffic	75
Heavy Traffic	85
Motorcycle	90
Garbage Truck	100
Emergency Response Siren	120

It is anticipated that construction activities would take approximately one year. Typical construction activities produce noise levels ranging from 80-100 dBA (Table 3-3) (EPA, 1971). Noise sensitive populations would experience an increase in noise during construction over normal urban noise levels. This increase would be slight because the populations are already located in a noisy urban setting with sounds that can approach up to 120 dBA. Construction activities for the rehabilitation and modernization of the Carnegie Library would only occur during construction hours – Monday through Saturday from 7am to 7pm, as designated by DCRA (DCRA, 2017). However, if construction would need to occur after hours an after hours permit would be obtained. Demolition and construction activities at the Library would result in a minor, short-term, direct, adverse noise impact. In the long-term, the operation of a retail store would not increase the noise levels over current conditions. Because there would be no additional noise impacts, except for temporary construction noises, noise was dismissed from further analysis.

Table 3-3: Typical noise from construction activities

Construction Phase	dBA levels (at 50 ft.)
Ground Clearing	88-91
Excavation	91-98
Foundation	85-88
Erection	88
Finishing	91-98

3.3.8 Land Use Planning and Zoning

3.3.8.1 Regional Land Use and Planning

Development within the District of Columbia is guided by *The Comprehensive Plan for the National Capital*, which includes goals, objectives, and planning policies to direct and manage growth. This plan contains both Federal Elements and District of Columbia Elements.

Federal Elements

The Comprehensive Plan for the National Capital – Federal Elements are prepared by NCPC and were updated in 2016 (NCPC, 2016). The Federal Elements provide principles, goals, and planning policies and address issues related to federal property and interests in the National Capital Region. Federal elements include: Urban Design, Federal Workplace, Foreign Missions & International Organizations, Transportation, Federal Environment, Historic Preservation, Visitors & Commemoration, and Parks & Open Space. The Federal Facilities elements of the plan that are relevant to the Carnegie Library include:

- Historic Preservation: This element includes policies to preserve, protect and rehabilitate historic properties in the National Capital Region and promote design and development that is respectful of the guiding principles established by the Plan of the City of Washington and the symbolic character of the capital's setting.
- Urban Design: This element includes policies to promote quality design and development in the National Capital Region that reinforces its unique role as the nation's capital and creates a welcoming and livable environment.

District Elements

The District Elements, adopted in 2006 and amended in 2011, focus specifically on the District of Columbia and contain a broad range of objectives and policies to help guide public decisions by District and federal agencies. The District Elements are divided into two categories: Citywide Elements and Area Elements. Citywide Elements include a broad range of planning topics that should be considered regardless of geographical location in the District. These include: Land Use, Transportation, Housing, Economic Development, Parks, Recreation and Open Space, Educational Facilities, Environmental Protection, Infrastructure, Urban Design, Historic Preservation, Community Services and Facilities, and Arts and Culture (DCOP, 2006a). The DC Office of Planning (DCOP) is currently in the process of amending the Comprehensive Plan.

Citywide Elements

The Citywide Elements that are most relevant to the Carnegie Library are summarized below:

- Land Use: This element establishes the basic policies guiding the physical form of the city, and provides direction on a range of development, conservation, and land use compatibility issues.
- Economic Development: This element addresses the future of the District's economy and the creation of economic opportunity that would benefit current and future District residents. It includes strategies to sustain major industries, diversify the economy, create jobs, maintain and support small businesses and neighborhood commercial districts, and reduce unemployment for District residents.
- Environmental Protection: This element addresses the protection, restoration, and management of the District's land, air, water, energy, and biologic resources. It provides policies and actions on important issues such as drinking water safety, the restoration of tree canopy, energy conservation, air quality, watershed protection, pollution prevention and waste management, and the remediation of contaminated sites.
- Urban Design: The element describes the ways in which different aspects of the city's landscape, especially its buildings, streets, and open spaces, work together to define impressions of Washington and its neighborhoods.
- Historic Preservation: The Historic Preservation Element defines the District's role in promoting awareness of Washington history, identifying and preserving historic resources, and ensuring compatible design in historic neighborhoods

- Community Services and Facilities: This element provides policies and actions on health care facilities, child care and senior care facilities, libraries, police stations, fire stations, and other municipal facilities such as maintenance yards. This element also incorporates planning and policy guidance from several District departments and other government agencies.

Area Elements

Area Elements are divided geographically to focus on goals, objectives, and policies that are unique to particular parts of the District. The Carnegie Library project falls within the Central Washington Area Element.

- Central Washington Area Element: The Central Washington Area encompasses 6.8 square miles that include the "monumental core" of the city, the city's Downtown, and employment areas. It is the seat of the federal government and also includes entertainment and cultural centers such as Gallery Place and Penn Quarter. The major planning objectives for the Central Washington Area include: a vision of a mixed use "living downtown" with high density housing, retail, entertainment, and offices (DCOP, 2006b).

3.3.8.2 Project Area Land Use, Planning, and Zoning

Pursuant to its enabling legislation, NCPC has zoning jurisdiction over the Carnegie Library as it is a District-owned property located in the central planning area. The Zoning Regulations for the District of Columbia (ZR) specifically exclude District of Columbia properties located within this geographic area from regulation by local zoning authorities (DCMR 11-A208.1[b]). Therefore, because the Library is located in the central area, NCPC possesses authority to review and approve changes to the zoning of the Carnegie Library in accordance with zoning standards NCPC determines appropriate. Typically, NCPC looks to the ZR for guidance on reasonable and appropriate standards to apply. However, if NCPC determines a deviation from a particular provision in the ZR is appropriate, the deviated standard does not require consultation with the District of Columbia's Board of Zoning Adjustment for a variance.

A summary of the relevant local zoning is provided below. As noted, NCPC will consider the local zoning as guidance in its review of the proposed project.

According to the District of Columbia Existing Land Use Map, there are 19 individual land use categories in the District (DCOP, 2006c). The Carnegie Library is designated as "local public," surrounded by commercial and institutional uses. The future land use for the Carnegie Library is designated as parks or open space, surrounded by high density commercial, local public, and mixed uses (DCOP, 2013).

According to the 2016 DC Zoning Map, the project area is within a Downtown Zone (D-5) within the Massachusetts Avenue and Mt. Vernon Square Downtown Subarea. The zoning designations adjacent to the Carnegie Library include other Downtown Zones (D-4, D-4-R, D-5-R) and mixed-use (MU-7). The general purposes of the downtown zones are to create a balanced, high-density mix of office, retail, service, residential, entertainment, lodging, institutional, cultural, and other uses that are essential to a successful downtown; protect historic buildings while permitting compatible new development; guide the design of new buildings to be consistent with the Central Washington

element of the Comprehensive Plan; preserve historic L'Enfant streets and rights-of-way; establish requirements for retail uses on the ground levels of buildings facing high-priority streets; encourage public open space; encourage development of standard and affordable housing within the confines of the Comprehensive Plan; establish a density credit system to incentivize retail, residential, historic, and open space goals; and provide for visually acceptable parking and loading facilities that do not interfere with sidewalks (DCMR 11-A100). The D-5 zone specifically emphasizes development of commercial and mixed uses, with incentives for residential use in normally non-residential areas (DCMR 11-I538-545). The Downtown Subarea further encourages a boulevard feel and park-like openness for the Massachusetts Avenue corridor (DCMR 11-I610).

No changes to the building height, setbacks, or percentage of lot occupancy would occur as a result of the proposed project. The addition of a retail use in the Carnegie Library is consistent with both the Federal and District Elements of the *Comprehensive Plan for the National Capital* and with local land use and zoning. Therefore, land use planning and zoning has been dismissed from further analysis.

3.3.9 Population and Housing

According to the 2016 DC Zoning Map, the project area is within a Downtown Zone (D-5) within the Massachusetts Avenue and Mt. Vernon Square Downtown Subarea. The zoning designations adjacent to the Carnegie Library include other Downtown Zones (D-4, D-4-R, D-5-R) and mixed-use (MU-7). These zones encourage a mix of uses, including residential.

No housing is located on the project site. The project would not require the relocation of residents or employees into or out of the project area, and would therefore have no effect on population. No housing immediately adjacent to the site would be adversely affected by the proposed project. Therefore, population and housing has been dismissed from further analysis.

3.3.10 Environmental Justice

EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was issued on February 11, 1994 by President Clinton (White House, 1994). This order directs federal agencies to identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority or low-income populations.

A low-income individual is defined as any individual living below the poverty line, as derived from the Office of Management and Budget's (OMB) Statistical Policy Directive 14. A low-income population is defined as any census tract with a higher percentage of low-income individuals than the District population as a whole. A minority individual is defined as any individual that is nonwhite or identifies as Hispanic or Latino. A minority population is defined as any census tract with a higher percent minority than the District population as a whole.

Low-income and minority populations were identified through the review of U.S. Census Data from American Community Survey (ACS) 5-Year Estimates for 2017 (U.S. Census, 2017). The project area is located within Census Tract 58 in the District. Within Census Tract 58, 16.4 percent of the population is below the poverty level and 37.6 percent is nonwhite and/or Hispanic/Latino. These

percentages are lower than the City rates of 18.0 percent below poverty level and 64.4 percent minority. No housing is located on the project site. The project would not require the relocation of residents or employees into or out of the project area, regardless of race or income. No housing immediately adjacent to the site would be adversely affected by the proposed project. The Carnegie Library is a community resource that currently houses the administrative offices, archival storage, exhibit galleries, and research functions of HSW, including the Kiplinger Research Library. Access to these services is available to all District residents and would continue following the rehabilitation and modernization of the Carnegie Library.

While there are minority and low-income populations in the vicinity of the Carnegie Library, the proposed action would not disproportionately affect these groups. Any impacts experienced by minority populations and/or low-income populations would be similar to those experienced by the overall population, therefore, environmental justice was dismissed from further analysis in this EA.

3.3.11 Utilities

DC Water provides sewer, stormwater drainage, and water service for the Carnegie Library. The Library is within DC Water's Combined Sewer System (CSS) and therefore both sanitary sewer lines and stormwater drain to the same discharge system. One 10-inch sanitary sewer pipe exits the building from the north, and two six-inch sewer pipes exit the building from the southwest and southeast. These sewer pipes, as well as most of the storm drains throughout the site, flow into a combined sewer pipe that flows south from Mount Vernon Place, NW, along the west of the Carnegie Library building. This combined sewer pipe ultimately flows to a three-foot by 4.5-foot combined sewer that flows west underneath K Street, NW.

Water service is provided to the Carnegie Library via a 1.5-inch water pipe that enters the building from the south.

In the District, businesses can choose to purchase electricity from a variety of electric suppliers. Some of these providers offer options for clean or renewable energy, such as wind, solar, biomass, hydropower, and geothermal. Regardless of the supplier, all electricity in the District is delivered through the Potomac Electric Power Company, Inc. (PEPCO) network (PEPCO, 2017). Electric service is provided to the Carnegie Library site via underground electric power lines entering the site from Mount Vernon Place, NW, to the north and from K Street, NW, to the south.

Natural gas is distributed by Washington Gas via a two-inch underground gas line entering the northwest corner of the building from 9th Street, NW.

Network and phone service is provided by Verizon via underground telecommunication lines underneath Mouth Vernon Place, NW.

The proposed project would involve the replacement or upgrade of mechanical, electrical, and plumbing systems within the building to meet current codes and to increase energy efficiency. The rehabilitation of the Carnegie Library would likely involve some or all of the following sustainability improvements: LED lighting, retro-commissioning of building controls, energy modeling, introduction of natural ventilation and operable windows, high-efficiency boiler and water heater, upgraded HVAC systems, rainwater harvesting, and low-flow water fixtures. The proposed tenant would be committed

to using renewable energy. The proposed tenant would likely choose to purchase electricity from a third-party supplier that uses renewable energy sources, either directly or through collaboration with Events DC as landlord. Regardless of supplier, electricity would continue to be distributed through PEPCO's infrastructure. These system upgrades and use of renewable energy would result in a negligible, long-term, beneficial impact to utility usage. All necessary building permits would be acquired prior to construction to avoid and minimize disruptions to utility services. Because there would be a slight beneficial impact, utilities have been dismissed from further analysis.

3.3.12 Waste Management

The District Department of Public Works (DPW) manages the disposal of the District's solid waste materials. General waste is regulated under DCMR 21. Recyclable waste is regulated under the DC Solid Waste Management and Multi-Material Recycling Act of 1988 (DC Code §6-3403), which requires all government agencies and businesses to implement and manage a recycling program. A commercial recycling program includes separation of recyclables from other solid waste, ensuring an adequate number of containers for separated recyclables and hiring a licensed, registered recycling hauler to regularly pick up recyclables (DC DPW, 2011). Commercial and institutional waste is accepted at DPW's transfer stations and then disposed at Fairfax County's Energy Resource Recovery Facility in Lorton. Recycling materials are taken to a near-by Maryland facility where they are sorted and processed to be reused as raw materials.

The Carnegie Library currently uses a color-coded recycling program first developed for the Convention Center. Recycled materials include glass, aluminum, plastic, cardboard, paper, batteries, fluorescent bulbs, and toner and ink cartridges.

The addition of a retail store in the Carnegie Library could result in a slight increase in solid waste and recyclable materials. The proposed tenant would commit to using 100 percent recyclable materials in packaging and shipping methods, and would implement a recycling program to minimize the environmental impact of any waste produced. An electronics recycling program would be implemented, which would reduce the number of electronic devices disposed in local landfills. In coordination with Events DC, the proposed tenant would continue to contract with existing waste and recycling companies and may engage a specialty recycling company for electronic waste, as needed. Overall, the rehabilitation of the Carnegie Library would result in a negligible adverse impact to waste management. Therefore, waste management has been dismissed from further analysis.

3.3.13 Safety and Security

The Carnegie Library is served by the District's First Police District (101 M Street SW, approximately 2.3 miles driving distance from the project area), Police Service Area (PSA) 102.

The DC Fire and Emergency Medical Services (EMS) Department provides fire and rescue services to the Carnegie Library. The closest stations are located at Engine Company 16 at 1018 13th Street, NW (approximately 1900 feet due east); and Engine Company 06 located at 1300 New Jersey Avenue, NW (approximately 2700 feet northwest). Response times to the Carnegie Library from these locations vary.

Events DC employs a Security Services department, which provides general building security. This department oversees the command center, building access, building perimeter patrols, security of interior spaces, and coordination with District and federal law enforcement agencies.

The addition of a retail store that could sell high-value commodities may create a target for theft. However, the proposed retail tenant would provide their own onsite security measures in addition to the existing Events DC security services. No changes to traffic volume or patterns are proposed, so no impacts to police, fire, or EMS response times are anticipated. The presence of a retail store is unlikely to affect special event security. Security during special events would be coordinated with Events DC on a case-by-case basis. Therefore, Safety and Security has been dismissed from further analysis.

3.4 IMPACT TOPICS ANALYZED IN DETAIL

As with any environmental analysis, there are resource issues that are analyzed in further detail to compare the environmental consequences of the No-Action Alternative with the Action Alternative. Each of the alternatives described in Chapter 2 would have varying impacts to natural resources, the social and economic environment, historic resources, and infrastructure. The resources analyzed in detail in this EA are:

- Cultural Resources
- Transportation
- Economy, Employment, and Income
- Community Facilities and Services
- Environmental Contamination and Hazardous Materials

3.5 CULTURAL RESOURCES

In accordance with Section 106 of the National Historic Preservation Act (NHPA) (CFR 36 § 800.4), NCPC, as the lead federal agency, is required to consider the effects of the proposed action on historic properties. Historic properties, as defined by NHPA, are any prehistoric or historic district, site building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP). This term includes artifacts, records, and remains that are related to and located within such properties, as well as properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

To be included in, or found eligible for inclusion in, the NRHP, historic properties must meet one of the following criteria (as defined in CFR 36 § 60.4):

- Be associated with events that have made a significant contribution to the broad patterns of our history; or
- Be associated with the lives of persons significant in our past; or
- Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction, or

- Have yielded, or are likely to yield, information important in prehistory or history.

Historic properties must also possess sufficient integrity to convey their significance, including their location, design, setting, materials, workmanship, feeling, and association.

An early step the Section 106 process is the determination and documentation of the Area of Potential Effects (APE). As defined by 36 CFR § 800.16 (d), an APE is "the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." Upon initiation of Section 106 consultation, NCPC identified a preliminary APE, which was refined in consultation with DC State Historic Preservation Office (DC HPO) and other consulting parties.

3.5.1 What is the Area of Potential Effect for the Proposed Action?

The APE for the Proposed Action is bounded by L, H, Tenth, and Eighth Streets, N.W. (see Figure 3-5). The APE for this project was delineated to include views and viewsheds from the surrounding area to the project site. The APE boundaries reflect the outer limits from which views toward the property may reasonably generate indirect adverse effects.

Historic properties within the project site and the APE were identified through a review of multiple sources, including NRHP, National Historic Landmark, District of Columbia Inventory of Historic Sites (D.C. Inventory), and Determination of Eligibility (DOE) documentation. This review was also supplemented by consultation with DC HPO, historic map research, and on-site survey. The project area is located in Downtown Washington, D.C., a dense urban setting that has been well documented through historic resources surveys and National Register documentation.

The boundaries of the APE overlap with portions of the Downtown Historic District and pending Downtown Historic District Boundary Expansion, Mount Vernon Square Historic District, and the Plan of the City of Washington (L'Enfant Plan; L'Enfant-McMillan Plan). It also includes six individual resources listed in the D.C. Inventory and/or the NRHP. See below for descriptions of these resources.[1]

[1] All descriptions of properties were adapted from the *D.C. Inventory of Historic Sites, Alphabetical Version* (DC Historic Preservation Office, 2009) and their respective D.C. Inventory or National Register forms.

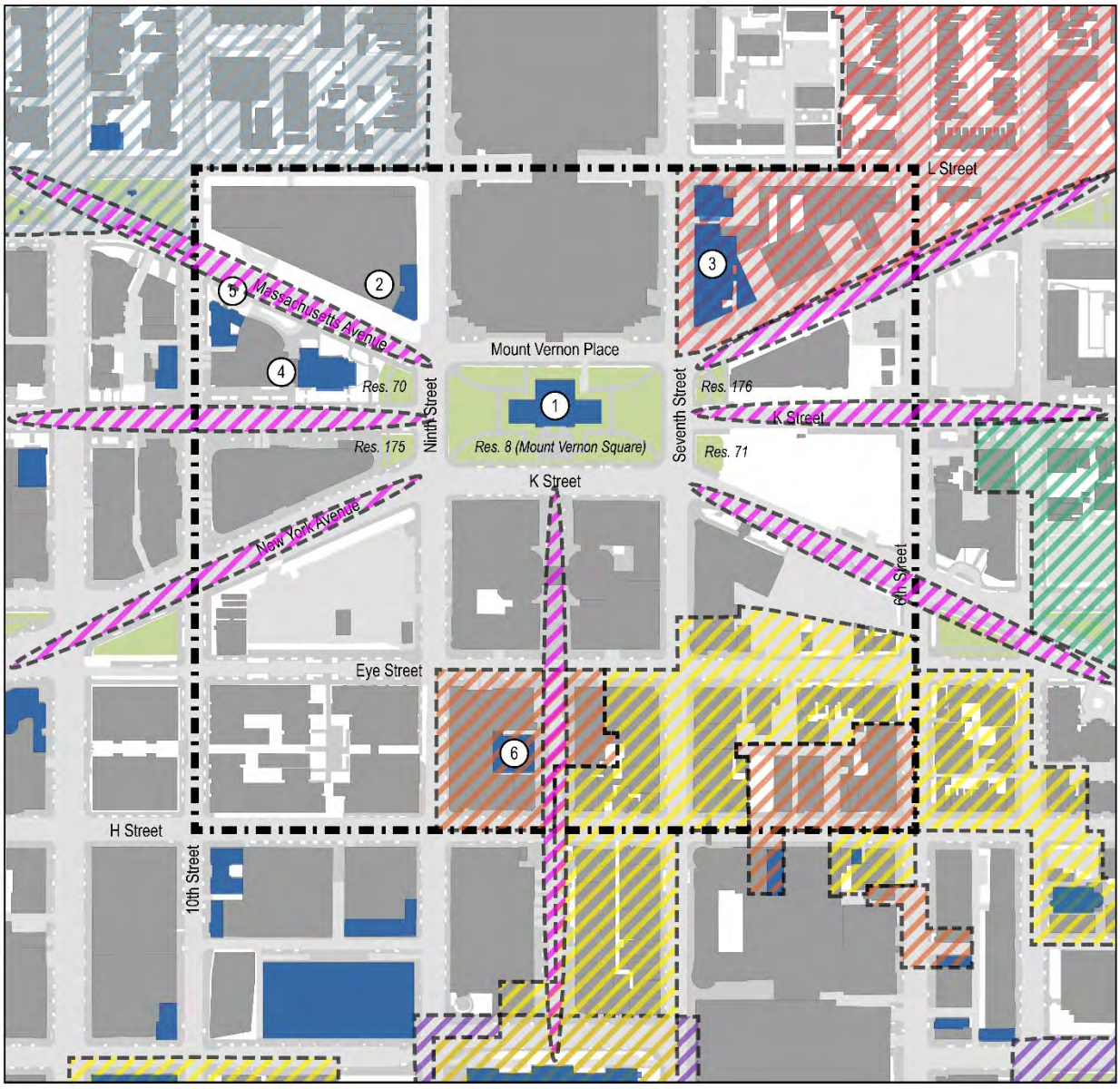


Figure 3-5. Area of Potential Effects Map (EHT Traceries)

3.5.2 What Historic Districts are Located within the Area of Potential Effect?

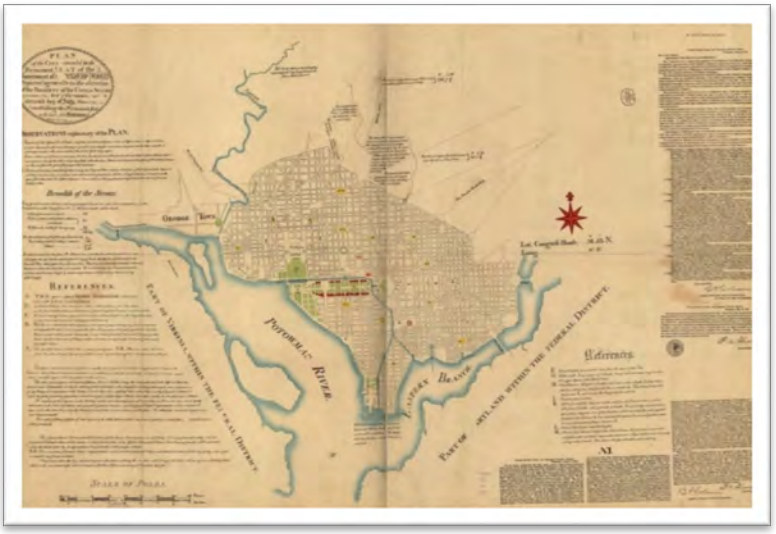


Figure 3-6: 1887 Facsimile of the L'Enfant Plan (Library of Congress)

The Plan of the City of Washington (L'Enfant Plan; L'Enfant-McMillan Plan) and Reservations 8, 70, 71, 175, 176

D.C. Inventory, 1964 (identified), 1971 (designated), 1997 (expanded); National Register, 1997; HABS DC-682; HABS DC-668

The Plan of the City of Washington is the largest and most comprehensive example of a Baroque city plan in the United States. The plan is comprised of three contributing element types: reservations and appropriations; streets and avenues; and vistas. The plan is the masterpiece of Pierre Charles L'Enfant, a French architect and civil engineer asked by President George Washington to survey the site of the future capital and recommend locations for its important buildings. L'Enfant returned with a Baroque city plan based on European precedents, with a coordinated system of radiating avenues and vistas overlaid upon an orthogonal grid of streets. L'Enfant's grandiose vision—which relies on geometric, visual, symbolic, and hierarchical patterns—has come to define the physical character of the national capital (Figure 3-6).

The L'Enfant Plan was realized incrementally throughout the eighteenth and nineteenth centuries. Major federal buildings were erected on some of the original appropriations purchased by the federal government in 1792, including the White House, Capitol, and Old Patent Office. Others were improved and maintained as landscaped parks, including Lafayette Square, President's Park, and the Mall. During the 1870s, a number of municipal improvements were taken throughout Washington by the Office of Public Buildings and Grounds. The Office undertook to improve the avenues, resulting in the improvement of the plan's major circles and squares as well as the acknowledgment of the lesser parks and reservations. This trend continued throughout the 1880s and 1890s, with dozens of additional reservations being identified and improved.

In the twentieth century, evaluating and improving the L'Enfant Plan was a fundamental component of the McMillan Commission's recommendations. The Commission revived a number of L'Enfant elements while recasting them to meet the ideals of the City Beautiful movement. The result was an elegant and monumental city plan that became a national model for urban planning.

The Plan of the City of Washington is significant as a representation of two centuries of civic, design, and political ideals. During the past two centuries, it has provided a framework for the dramatic growth of Washington, D.C. as well as innumerable nationally significant events, serving continuously as the setting for national political expression.

Reservations 8 (Mount Vernon Square), 70, 71, 175, and 176

Bounded by Seventh and Ninth Streets and New York and Massachusetts Avenues

D.C. Inventory, 1971 (expanded 1997); National Register, 1997; HABS DC-682

Mount Vernon Square (Reservation 8) and the four small adjacent parks located to the east of Seventh and west of Ninth Streets (Reservations 70, 71, 175, 176), make up 2.8 acres and contain numerous trees, footpaths and Washington standard lamp posts. The Central Public Library, also known as the Carnegie Library, is the outstanding feature of the square.

The square was originally shown as a rectangular-shaped open area on the 1791 L'Enfant Plan, one of fifteen squares planned to be divided among the states to feature statues and memorials. In 1846, a large public market was erected in the square along Seventh Street after residents petitioned the city government for permission. The market was later removed in 1872 and in that same year the intersecting streets and avenues were continued through the square and landscaping improvements were made. By 1882, the carriageways were removed and replaced with gravel footpaths and the square was turned into a park with newly installed drinking fountains, planted trees and flowering shrubs. In 1899, Andrew Carnegie offered to donate funds for a central library provided the city maintain a free library service. The resulting Central Public Library was completed in 1903, but the square was not redesigned and landscaped until 1913, and that design remains largely intact today.

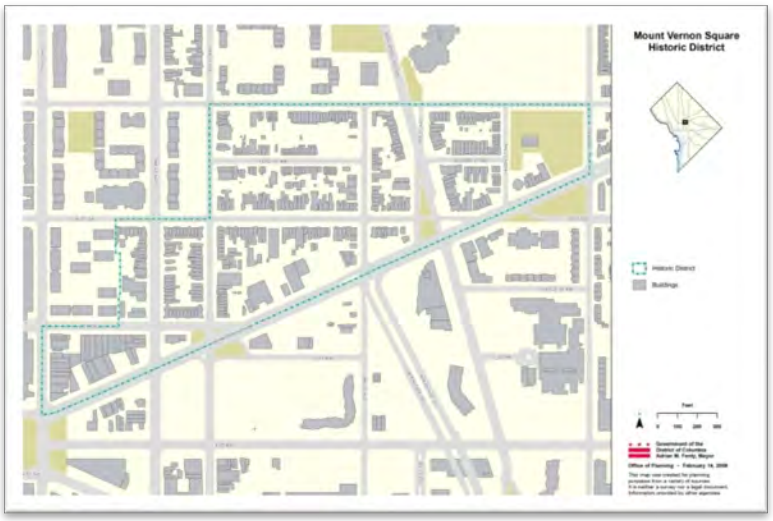


Figure 3-7. Mount Vernon Square Historic District (DC HPO 2008)

Mount Vernon Square Historic District

Roughly bounded by First Street, New York Avenue, Seventh Street, M and N Streets, N.W.

D.C. Inventory, 1999; National Register, 1999

The Mount Vernon Square Historic District (Figure 3-7) is significant as a Victorian-era commercial and residential neighborhood located within the historic boundaries of the District of Columbia's Federal City. The developing neighborhood's rapid growth was in response to the city's increased demand for housing following the Civil War, the extensive programs to modernize the city in the 1870s, and the expansion of the national capital's economy and population. The greatest development phase for the area occurred in the last four decades of the nineteenth century, with the majority of the resources erected and designed by local builders and architects for speculative developers. Primarily dwellings, the buildings comprise an intact and cohesive collection of brick, flat- and bay-fronted row houses executed in a variety of styles and expressions. The Mount Vernon Square neighborhood is also significant for its commercial resources, which generally front Seventh Street and New York Avenue and stand two- to three- stories in height with storefronts on the first floor. These mercantile buildings range in date from the middle part of the nineteenth century to the early twentieth century, documenting the existence of the significant transportation system that serviced the community as it grew northward.

The Mount Vernon Square Historic District includes 429 contributing buildings with period of significance that begins circa 1845 and extends to 1945.

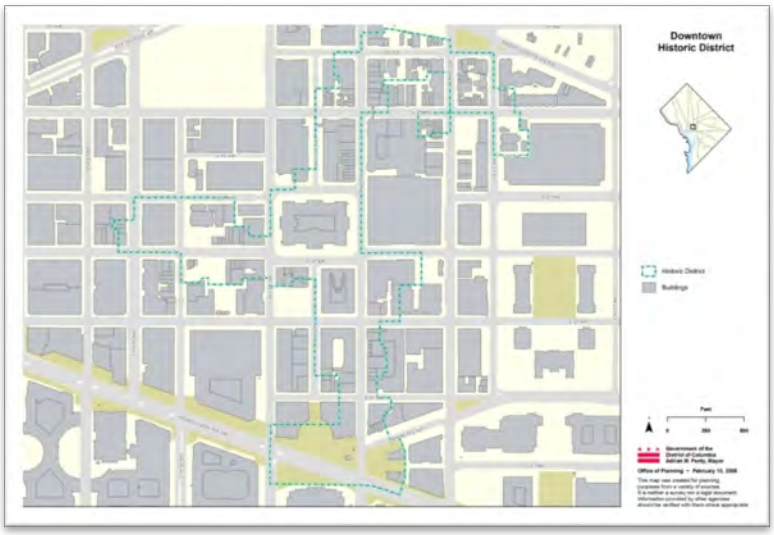


Figure 3-8. Downtown Historic District (DC HPO 2008)

Downtown Historic District

7th Street, N.W., between Pennsylvania Avenue and Eye Street; F Street, N.W. between 7th and 11th Streets; and H and Eye Streets, N.W., between 5th and 7th Streets

D.C. Inventory, 1982 (effective 1994); National Register, 2001

With two hundred contributing resources, the Downtown Historic District (Figure 3-8) is among the smaller of the city's historic districts, yet it is also one that captures the greatest breadth and diversity of architectural and historical development. Beginning in the early nineteenth century, growth of a commercial corridor along Seventh Street radiated north from the newly established Center Market. Federal investment in the 1830s added the Patent Office and General Post Office buildings, two imposing edifices that anchored the center of the district and stimulated additional growth, drawing both trade and professional classes to the area. In the second half of the nineteenth century, growth continued north along Seventh Street, dominated by a mix of department stores, dry goods businesses, and furniture stores. Development shifted westward in the twentieth century, with a number of grand department stores lining F Street by the mid-1920s.

Although primarily commercial in nature, the Downtown Historic District includes a number of significant religious, institutional, and federal buildings, in addition to several residential groupings. Its period of significance dates from 1830 to 1940.

Figure 3-9. Buildings in the proposed boundary expansion, along Sixth (above left) and H Streets (above right) (Traceries 2012)

Downtown Historic District (Boundary Increase)

600 and 800 blocks of H Street N.W.; 800 block of 8th Street, N.W.; and 700 and 800 blocks of 6th Street, N.W.

Designation Pending

A Landmark Application for the historic district boundary increase has been submitted by the DC Preservation League to DC HPO for review by the Historic Preservation Review Board. The landmark application proposes the expansion of the existing boundaries of the Downtown Historic District to augment the description of religious institutions, alley dwellings, and residential buildings as they contributed to the growth and character of the neighborhood (Figure 3-9). The boundary expansion also allows Essex Court (within Square 453) to be included in the district in its entirety. Essex Court represents the largest and most physically intact collection of alley buildings within Downtown.

The application also expands the scope of the original nomination to include a more detailed discussion of the growth of Chinatown within Downtown throughout the twentieth century. Beginning in the 1930s, the city's Chinese population relocated to this area of Downtown, bringing with them a unique culture, mix of businesses, and architectural vocabulary. A corresponding expansion in the district's period of significance—to 1986—has also been proposed for those buildings contributing to the history and character of Chinatown.

The proposed Downtown Historic District Boundary Increase includes fifteen contributing buildings and one contributing structure.

3.5.3 What Individually Designated Properties are Located within the Area of Potential Effect?

Figure 3-10. Central Public Library in Mount Vernon Square (Traceries 2014)

Central Public Library (Carnegie Library)[2]

Mount Vernon Square, N.W.

D.C. Inventory, 1964; National Register, 1969

One of the many public library buildings bestowed upon American cities by Andrew Carnegie at the turn of the century, the Central Public Library was dedicated in Mount Vernon Square by Carnegie and President Theodore Roosevelt in 1903 (Figure 3-10). The choice of site was an auspicious one, identified as one of fifteen major public squares in Washington by L'Enfant's original plan, but not dedicated to any permanent civic use until that time. A national competition was held to select the architect, with the winning entry submitted by New York-based Ackerman and Ross. Their design for the building was in the Beaux Arts style, with a central pavilion flanked by secondary bays. Four stories in height, the building has a partially exposed basement, two principal stories, and a recessed attic story. The basement walls are clad in pink Milford granite and the upper-story walls in white Vermont marble. Facing south along the Eighth Street axis, the building's principal façade features several inscriptions and sculptural groupings. The building is significant for the prominence of its design and architectural character, and also as a far-reaching educational institution in Washington, DC

[2] Numbers correspond to location of resource on APE map

Figure 3-11. AFL Building (Traceries 2014)

American Federation of Labor

901 Massachusetts Ave, N.W.

D.C. Inventory, 1979; National Register, 1974; National Historic Landmark, 1974

The American Federation of Labor (AFL) Building at Ninth Street and Massachusetts Avenue, N.W. was dedicated in 1916 by President Woodrow Wilson and was heralded as the "national labor temple" during its tenure as the headquarters of that organization. Its seven-story, Italian Renaissance Revival-style design by architecture firm Milburn Heister & Co. was intended to symbolize the strength and stolidity of the country's most powerful labor union. Clad in variegated brown brick with limestone accents, the building served as the AFL headquarters until 1956, following their merger with the CIO (Figure 3-11).

Figure 3-12. Seventh Street, NW, East Side of 1000 Block (Traceries 2014)

Seventh Street, N.W., East Side of 1000 Block

1005-1035 Seventh Street, N.W. and 649-651 New York Ave, N.W.

D.C. Inventory, 1978; National Register, 1984; Contributing Resource to the Mount Vernon Square Historic District

Buildings included within this multi-property resource are architecturally cohesive, representing an almost intact row of small and moderately size, nineteenth-century commercial buildings. Dating predominantly from the 1870s and 1880s, but with a span of construction that extends to the 1930s, the buildings range in width from three to six bays (Figure 3-12). The ornate cornices that crown the facades denote individual buildings, each designed and erected by different architects and builders. The most ornate structure in this grouping is the Isaac Levy and Son paint store at 1015 ½ Seventh Street, N.W., erected in 1888. This building's architectural detailing is the epitome of the Italianate style with its heavy window hoods and finely detailed cornice.

Strategically located near the intersection of Massachusetts and New York Avenues at Mount Vernon Square, the buildings convey their post-Civil War development within the aesthetic and historic context of the implementation of the L'Enfant Plan during the course of the nineteenth century. The buildings retain a cohesive appearance with architectural similarities including height, ornament, materials, rhythm, scale, and style. Together, they the most architecturally distinguished group of late nineteenth and early twentieth century commercial buildings in the vicinity of Mount Vernon Square.

Figure 3-13. Mount Vernon Place United Methodist Church (Traceries 2014)

Mount Vernon Place United Methodist Church

900 Massachusetts Ave, N.W.

D.C. Inventory, 1964

Due to the nature of its triangular site, Mount Vernon Place United Methodist Church is a highly visible landmark (Figure 3-13). Located at the convergence of Massachusetts Avenue and K Street, N.W., the church faces Reservation 70 and Mount Vernon Square and has exposures on three sides. The Beaux Arts-style building, elevated on a raised basement, was designed by Sauguinet & Staats and completed in 1917. It is fully clad in white marble, with a hexastyle Doric portico on its main (east) entrance, accessed by a generous, cascading stair. An additional portico faces north.

Figure 3-14. Tudor Hall (Traceries 2014)

Tudor Hall (Henley Park Hotel)

926 Massachusetts Ave, N.W.

D.C. Inventory, 2001

Completed in 1918, Tudor Hall was constructed to respond to the massive housing shortage caused by the influx of workers into Washington during World War I (Figure 3-14). The eight-story, brick-and-stone clad building was designed by local architect Walter Granville Guss. Although its apartments were modest in size and appointment, the building boasted a handsome façade and lobby designed in the Tudor Revival style. Unlike the Neo-Classical apartment buildings of a generation earlier, Tudor Hall was less formally composed, with an asymmetrical silhouette and irregular concentration of detail.

Figure 3-15. Washington Hebrew Congregation (Traceries 2012)

Washington Hebrew Congregation (Greater New Hope Baptist Church)

816 8th Street, N.W.

D.C. Inventory, 1964

The former Washington Hebrew Congregation, now the Greater New Hope Baptist Church, visually dominates the 800 block of Eighth Street, N.W. (Figure 3-15). Designed by architects Stutz & Pease in the Exotic Revival style, the building featured a monochromatic sandstone façade; a handsomely detailed interior; monumentally scaled stained glass windows; lance-like corbelling along the roof parapet; and two towering, engaged belfries with domed roofs (the roofs were removed circa 1970). When completed in 1897, the building's architectural style and physical prominence were intended to distinguish and reflect that of its Jewish congregation. The congregation remained in the building until the 1950s, when the property was sold to the predominantly African American Greater New Hope Baptist Congregation, reflecting a twentieth-century demographic shift in downtown, as well as much of the District of Columbia.

3.5.4 How could the Carnegie Library be affected by the Proposed Action?

No Action Alternative

Under the No Action Alternative, Events DC would continue its existing use of Carnegie Library and Mount Vernon Square and its current management and maintenance routine. This alternative proposes no alterations to the site or the building interior or exterior. Based on these factors, the No Action Alternative would result in negligible adverse impacts to the Carnegie Library. For purposes of Section 106 of the NHPA, there would be no adverse effect on historic properties.

Action Alternative (Alternative A)

Alternative A proposes to rehabilitate Carnegie Library, including an exterior restoration and minor site improvements. Under the proposed action, the use of the building would be changed to introduce a retail component to the existing event, research, education, and office uses, which would continue. The minor change in use does not inherently represent an adverse effect.

Site Improvements

Although no major landscape or site improvements are being proposed under Alternative A, minor alterations are being proposed to the site paving, grading, and vegetation to meet stormwater management and accessibility requirements. These alterations have no potential to cause and adverse impact to the Carnegie Library. For purposes of Section 106 of the NHPA, there would be no adverse effect on historic properties as a result of the site improvements.

Carnegie Library Exterior

Alternative A proposes the exterior restoration of Carnegie Library, including the repair and retrofit of exterior architectural elements and the removal of non-original additions. These alterations are being proposed to improve the operation and energy efficiency of the building and enhance its visual appearance and architectural character.

Overall, Alternative A would result in a minimal loss of historic fabric, which would result in negligible, long-term, adverse impacts. The removal of the north elevation windows and a portion of the central stone pier, constitutes a minor, long-term, adverse impact. This would constitute an adverse effect under Section 106 of the NHPA. The replacement in-kind of deteriorated stone pediments, would require addition analysis to determine whether it constitutes an adverse, long-term, impact.

Carnegie Library Interior

Alternative A proposes the interior rehabilitation of the Carnegie Library building to support retail and associated programmatic uses. This rehabilitation affects spaces throughout the building, although most changes would affect non-original infill construction and would not adversely impact the historic character of Carnegie Library. The following would create a negligible, long-term, adverse impact, but there would be no adverse effect under Section 106 of the NHPA:

- Retention and repair of a majority of historic finishes and features throughout the building, including decorative wood and plaster, principal public stairwell, original doors, and original terrazzo flooring and laylight ceiling on the second story landing;
- Removal or reconfiguration of non-original wall, floor, stair, and elevator components throughout, including alteration or replacement of material finishes;
- Repair and/or replacement of building systems, including mechanical, electrical, plumbing, and other systems;
- Removal of infill construction in the first story reading rooms and the restoration of the original ceiling and floor configurations in those spaces;

The creation of a central atrium in the building, would result in the more extensive removal of historic fabric. This includes the historic laylight ceiling on the first floor and portions of the north wall on the second-floor landing. This action constitutes a minor, long-term, adverse impact. This would constitute an adverse effect under Section 106 of the NHPA.

Mitigation Measures

The Section 106 consultation process is ongoing. NCPC, Events DC, DC HPO, and the consulting parties are continuing to identify ways to avoid, minimize, and mitigate adverse effects to historic resources. These parties would agree upon mitigation measures that would be implemented in accordance with an agreement document developed to resolve the Section 106 process. This could include measures to mitigate the adverse effects described above, including the removal of historic fabric on Mount Vernon Square and the Carnegie Library building interior and exterior. The Section 106 agreement document would identify these mitigation measures and stipulate that consultation would continue through the design and construction processes.

3.5.5 How will other historic resources within the Area of Potential Effects be affected?

No Action Alternative

Under the No Action Alternative, Events DC would continue its existing use of Carnegie Library and Mount Vernon Square and its current management and maintenance routine. This alternative proposes no alterations to the site or the building interior or exterior. Based on these factors, the No Action Alternative would have no impacts to Mount Vernon Square or other historic resources in the APE. For purposes of Section 106 of the NHPA, there would be no adverse effect on these resources.

Action Alternative (Alternative A)

Alternative A proposes to rehabilitate Carnegie Library, including an exterior restoration and minor site improvements.

Site Improvements

Although no major landscape or site improvements are being proposed under Alternative A, minor alterations are being proposed to the site paving, grading, and vegetation to meet stormwater management and accessibility requirements. These alterations would result in a removal of historic paving, curbing, and stair features from Mount Vernon Square and would result in a minor, long-term, adverse impact. For purposes of Section 106 of the NHPA, there would be no adverse effect on these resources.

Carnegie Library Exterior

Alternative A proposes the exterior restoration of Carnegie Library, including the repair and retrofit of exterior architectural elements and the removal of non-original additions. Any repair or restoration efforts would be minimally visible from the surrounding area beyond the boundaries of Mount Vernon Square. In most cases, the non-original additions being proposed for removal date from an earlier, 2001-2003 rehabilitation of the Carnegie Library. Therefore, the exterior alterations proposed for

the Carnegie Library building have no potential to adversely impact the character or integrity of Mount Vernon Square or other historic resources in the APE, either directly or indirectly.

Carnegie Library Interior

The interior rehabilitation of the Carnegie Library building proposed under Alternative A has no potential to adversely impact Mount Vernon Square or other historic resources in the APE.

3.5.6 What Archaeological Resources are located at Mount Vernon Square?

Perhaps the most likely archaeological resources to be present date to the mid-nineteenth century. Originally designated "Reservation 8" in Pierre L'Enfant's 1791 plan for the new Federal City, Mount Vernon Square remained unimproved until 1840, when the Northern Liberties Fire Company constructed a firehouse on the western portion of the block fronting on K Street. In 1846, the Northern Liberty Market was erected on the eastern half of the square. In the 1860s, the Market was described as an "intolerable nuisance," and local citizens tried to have it removed. Action was finally taken in 1872, when Alexander R. "Boss" Shepherd, head of the Board of Public Works, evicted vendors from the building. When the vendors refused to clear the building, Shepherd ordered a demolition crew to raze the Market structures during the night of 3 September 1872. Less certain is the history of the firehouse. Remains associated with both structures, including artifact deposits and structural features, could be present within the square.

In order to determine if there is potential for the proposed project to affect archaeological resources within the area of potential effect, a site survey was conducted on June 29, 2017. Ten hand augers were excavated in all areas surrounding the Carnegie Library where some lovel of ground disturbance – for removal of sidewalks, replacement of stairs, or creation of the storm water management planting beds – could occur. Geographic Information Systems (GIS)-assisted analysis of historic maps indicated that significant amounts of fill, perhaps as much as 10 feet thick, may be present south of the library, while 5 feet or less of fill was likely to be present north of the library.

The hand auger excavations to the south of the library, placed where two storm management planting beds are proposed, both encountered between 3 and 4 feet of fill. The auger to the west of the entrance stairs encountered old soils that date before the period of human occupation in the New World below the fill, indicating that there was no potential for archaeological resources at that location. The auger to the east of the stairs was confined to fill due to a rock obstruction.

Several other augers were also confined to fill due to rock obstructions. These include two augers to the west where sidewalks will be removed and replaced. There, we know that fill is present to at least 1.5 feet below surface. Another two augers in the northwest quarter of the square encountered fill to just over 2 feet below surface. These two augers were placed in the location of a proposed storm management planting bed.

Archaeological deposits *were found* in two locations along the northeast and east sides of the library. Northeast of the library where a storm management planting bed is proposed, a buried and intact soil deposit containing mid-nineteenth century artifacts was identified in two augers at just over 1.5 feet below the surface. The other area is at the sidewalk along the eastern facade of the building where a similar deposit containing mid-nineteenth century artifacts was found at over 2 feet below

the ground surface. Given the date of the items and the proximity of the augers to the former location of the Northern Liberty Market, these artifacts are most likely associated with that structure, although additional field investigations would be needed to confirm that interpretation.

The hand auger excavations indicate that there is fill to varying thickness across the square and that, at least in the northeast and east portions of the square, intact, artifact-bearing, archaeological deposits are present, most likely associated with the mid-nineteenth century Northern Liberty Market. If intact, artifact-bearing deposits are present, so too might be structural remains associated with the market building itself, although these would be more likely to be present closer to 7th Street NW.

3.5.7 How will Archaeological Resources be impacted by the project?

No-Action Alternative

Under the No Action Alternative, Events DC would continue its existing use of Carnegie Library and Mount Vernon Square and its current management and maintenance routine. This alternative proposes no alterations to the site or the building exterior. Based on these factors, the No Action Alternative would have no impacts to potential archaeological resources in the APE. For the purposes of Section 106 of the NHPA, there would be no adverse effect on these resources.

Action Alternative (Alternative A)

Although no major landscape or site improvements are being proposed under Alternative A, minor alterations are being proposed to the site paving, grading, and vegetation to meet stormwater management and accessibility requirements. These alternations, specifically grading and any additional ground-disturbing activities, have the potential to disturb the identified archaeological resources in the northeast and east quarters of the square. Depending on the significance of the resources when evaluated for listing in the National Register of Historic Resources (NRHP) under Section 106 of the NHPA, impacts could constitute an adverse effect. Alternatively, if the limited ground-disturbance envisioned is confined to the identified fill deposits, there would be no impact to the identified archaeological resources.

Mitigation Measures

The Section 106 consultation process is ongoing. NCPC, Events DC, DC HPO, and the consulting parties are continuing to identify ways to fully identify, evaluate for listing in the NRHP, and if found to be significant, avoid, minimize, and mitigate adverse effects to historic resources, including the identified archaeological resources located in the northeast and east quarters of the square. These parties would agree upon mitigation measures that would be implemented in accordance with an agreement document developed to resolve the Section 106 process. Avoidance, minimization, and mitigation to the archaeological resources would result in a determination of no adverse effects.

3.6 TRANSPORTATION

3.6.1 What Makes Up the Local Roadway Network?

A Transportation Impact Study (TIS) was conducted by Stantec Consulting Services Inc. (Stantec 2017). The TIS was developed using the DDOT Design and Engineering Manual and DDOT Guidelines for Comprehensive Transportation Review Requirements (CTR). It is included as Appendix C. The results of that study are summarized below.

Transportation in Washington, DC is comprised of a complex network of pedestrian, bicycle, vehicle, and mass transit systems. Generally, the City's transportation systems are developed and maintained by DDOT.

While Mt. Vernon Square and the Carnegie Library are located within Ward 2, a portion of the project study area lies on the boundary with Ward 6. The transportation study area includes the following intersections:

- 9th Street NW and K Street NW/New York Avenue NW
- 7th Street NW and K Street NW/Massachusetts Avenue NW
- 7th Street NW and K Street NW
- 7th Street NW and Mt. Vernon Pl NW/New York Avenue NW
- 9th Street NW and Mt. Vernon Pl NW/Massachusetts Avenue NW
- 9th Street NW and K Street NW

In addition to the above-listed intersections, this CTR evaluated pedestrian and bicycle facilities within a ¼-and ½-mile, respectively, including connections to and from nearby bus stops and Metrorail stations. Characteristics of the major corridors within the study area were obtained from maps on the DDOT and Metropolitan-Washington Council of Governments (MWCOG) websites denoting functional classification, 2015 AADT, number of lanes, speed limits, and truck routes/ loading zones. This information is summarized in Table 3-4. It should be noted that there is a mix of on-street parking regulations throughout the study area.

Table 3-4. Study Area Major Corridor Characteristics

Roadway	Functional Class	2015 AADT (thousands)*	Number of Lanes, Median	Speed Limit (mph)	Primary Truck Route/Designated Loading Zones?
Massachusetts Ave NW, west of 9th St NW	Principal Arterial	35.7	5, None	25 mph	Yes/No
Massachusetts Ave NW, east of 7th St NW	Principal Arterial	23.6	4, None	25 mph	Yes/No
Mt Vernon Pl NW	Principal Arterial	25.4	4, None	25 mph	Yes/No

Roadway	Functional Class	2015 AADT (thousands)*	Number of Lanes, Median	Speed Limit (mph)	Primary Truck Route/Designated Loading Zones?
New York Ave NW, west of 9th St NW	Principal Arterial	18.9	4, landscaped	25 mph	Yes/Yes
New York Ave NW, east of 7th St NW	Principal Arterial	24.0	6, striped with flexible delineators	25 mph	Yes/Yes
K St NW between 7th and 9th Sts NW	Principal Arterial	19.9	4, None	25 mph	Yes/No
9th St NW between Mt Vernon Pl NW and K St NW	Principal Arterial	18.3	5, None	25 mph	Yes/No
7th St NW between Mt Vernon Pl NW and K St NW	Principal Arterial	11.4	3, None	25 mph	Yes/No

* Traffic data obtained from the Regional Transportation Data Clearinghouse (RTDC) Data Viewer, Traffic Counts – Annual Average GIS layer, provided by the National Capital region Transportation Planning Board (TPB) as part of the Metropolitan Council of Governments (MWCOG), located here: http://gis.mwcog.org/webmaps/rtdc/

3.6.2 How Were Impacts to the Local Roadway Assessed?

Capacity analyses were performed for the signalized and unsignalized intersections in the study area utilizing Synchro 9 traffic analysis software. This software package provides average control delay, queues, and level of service (LOS) for each lane group and for the overall intersection. LOS is an evaluation of the quality of operation of an intersection and is a measure of the average delay a driver experiences while traveling through the intersection. LOS is dependent upon a range of defined operating conditions such as traffic demand, lane geometry, and traffic signal timing and phasing.

Utilizing Synchro instead of the more basic Highway Capacity Software (HCS) is preferable for transportation networks with a series of closely-spaced signalized intersections, as well as for networks with complex signal phasing, such as those within the study area. Under these conditions, Synchro is able to more accurately model the effects that the traffic operations (such as poor LOS or extensive queuing) at one intersection have on operations at an adjacent intersection.

LOS can range from A to F and is based on the average control delay per vehicle. For a signalized intersection, LOS A indicates operations with an average control delay less than 10 seconds per vehicle, while LOS F describes operations with an average control delay in excess of 80 seconds per vehicle at signalized intersections and 50 seconds per vehicle at unsignalized intersections, or a volume to capacity ratio greater than 1.0.

While LOS D or better operations are generally deemed satisfactory from a traffic operations perspective, LOS E or F operations are often indicative of queuing and congestion. Improvements as recommended in this study seek to maintain or improve traffic operations to LOS D or better, with minimal queuing, as reported by Synchro.

Signal plans and timing directives were provided by DDOT and were field-verified to accurately model signal operation type, phasing, detection, and cycle length.

3.6.3 How Would the Local Roadway Network be Affected by the Proposed Rehabilitation of the Carnegie Library?

No Action Alternative

Under the No Action Alternative, the rehabilitation and modernization of the Carnegie Library would not occur. No improvements would be made to the building. HSW would continue to lease their existing spaces and provide research and education opportunities at the Carnegie Library. Events DC would continue to host special events, and no changes to the amount of available rental space would occur. No changes in building usage would occur; therefore, no new impacts to the local roadway network would occur. Two intersections during the PM peak hour and all intersections during the Saturday peak hour currently operate at an overall LOS D or better. Table 3-5 indicates the intersections that operate at an overall LOS of E or F (failing condition) during the PM peak hour. These LOSs would continue under the No Action Alternative resulting in a moderate, long-term adverse impact to the local roadway network.

Action Alternative (Alternative A)

Under Alternative A, with the addition of a retail space inside the Carnegie Library, there would be a small increase (approximately three percent) in vehicular traffic generated by retail sales, deliveries, and special events as most patrons access the site via walking, by bicycle, or public transportation. All study area intersections would continue to operate at an overall failing LOS (LOS E or F) during the PM peak hour. However, the study area intersections would operate at an overall LOS D or better during the Saturday peak hour, with the exception of the intersection of 7th Street NW and K Street NW, which would operate at a LOS E and 7th Street NW and K Street NW/Massachusetts Avenue NW, which would operate at an overall LOS F (Table 3-5). Because Alternative A would only add a small amount of traffic to already failing intersections, Alternative A would have a negligible, adverse impact to the roadway network.

Table 3-5. 2020 Build Intersections Operating at Overall LOS E or F

Intersection	PM Peak Hour Level of Service	Saturday Peak Hour Level of Service
9th Street NW and Massachusetts Avenue NW/ Mt Vernon Pl NW	F	-
9th Street NW and New York Avenue NW/K Street NW	E	-
7th Street NW & Mt Vernon Pl NW/New York Avenue NW	F	-
7th Street NW & K Street NW	F	E
7th Street NW & K Street NW/Massachusetts Avenue NW	F	F

While the study area intersections continue to operate at an overall LOS that is the same as the No Action Alternative, DDOT requires mitigation for any turning movement that experiences an increase in delay of greater than 5 seconds per vehicle. Table 3-6 shows the movements that experience an increase in delay of more than five seconds per vehicle in one or both peak hours. However, it is

important to note that most of the study area roadways are at or over capacity, and, therefore, even small additions to vehicular volume result in exponential increases in delay and aggravate an already less than ideal traffic situation.

Table 3-6. 2020 Build Movements with Delay Increase of More than 5 Seconds

Intersection	PM Peak Hour	Saturday Peak Hour
9th Street NW and Massachusetts Avenue NW/ Mt Vernon Pl NW	EB-LT (+21) EB-R (+17) WB-LTR (+20)	EB-LT (+6) EB-R (+8)
9th Street NW and New York Avenue NW/K Street NW	WB-LT (+86)	-
7th Street NW & Mt Vernon Pl NW/New York Avenue NW	NB-L (+8)	WB-LT (+9)
7th Street NW & K Street NW	SB-LT (+19)	-
7th Street NW & K Street NW/Massachusetts Avenue NW	EB-LTR (+106) NB-LTR (+18)	EB-LTR (+47) SB-LTR (+30)

3.6.4 What Bicycle, Pedestrian, Public Transportation, and Parking Facilities Currently Exist at the Carnegie Library Site?

Bicycle Facilities

According to the 2005 DC Bicycle Master Plan, no existing bicycle facilities were present on the roadway network within the study area in 2005. Massachusetts Avenue NW, Mount Vernon Place NW, and K Street NW within the study area were signed bicycle routes. As such, the bicycle level of service in the study area was shown to be between C and E. However, since the study was conducted bicycle lanes were added to New York Avenue NW, west of the study area. The Downtown West Transportation Planning Study Existing Conditions report also identifies a proposed cycle track along Massachusetts Avenue NW that has yet to be constructed. It should be noted that bicycles are permitted to ride on the sidewalk north of Massachusetts Avenue.

Figure 3-16 shows existing bicycle facilities including bike lanes, bike routes, bike racks, and Capital BikeShare locations. It also shows that there is one Capital BikeShare location with the ¼-mile walkshed and eight locations within the ½-mile bikeshed.

Pedestrian Facilities

The site is served by a robust network of sidewalks that are provided on both sides of each study area roadway. According to the Downtown West Transportation Planning Study Existing Conditions report, completed August 2016, high pedestrian volumes and key transit corridors/connections are prevalent throughout the study area. Sidewalks vary in width from six to eighteen feet, and were observed to be in good to fair condition. Furthermore, signalized crosswalks are provided on all legs of the surrounding signalized intersections. Unsignalized crossings are provided across K Street NW at 9th Street NW and at 7th Street NW. Based on field observations, many of the crossings adjacent to the site appear to have ADA compliant curb ramps.

It should also be noted that a pedestrian-only mall, referred to as Techworld Plaza is provided on the south side of K Street NW, between 7th Street NW and 9th Street NW.

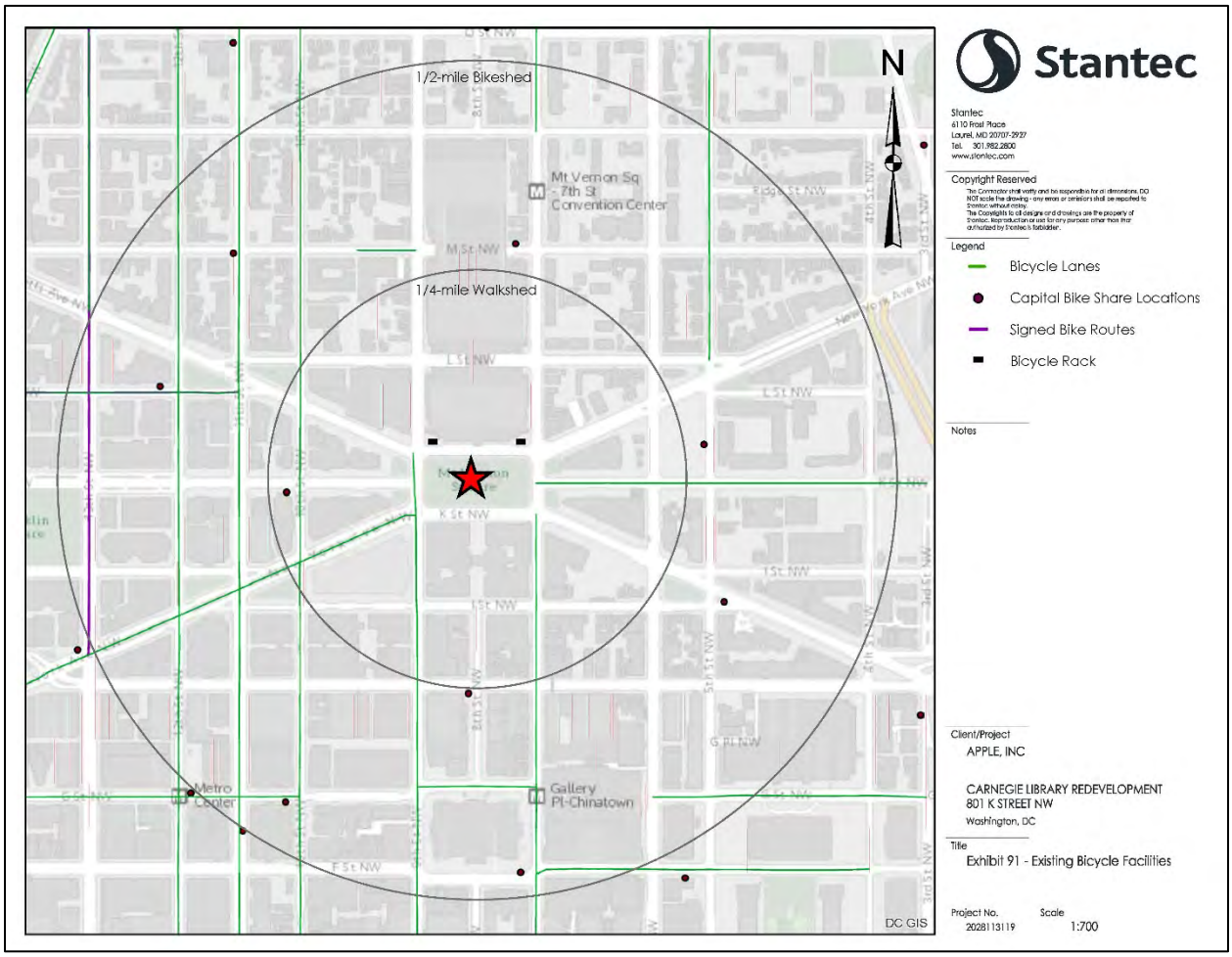


Figure 3-16. Existing Bicycle Facilities

Public Transit Facilities

The proposed retail redevelopment is located in an area with ample transit service that includes Metrobus and Metrorail. A transit analysis was conducted that includes all transit stops within a ¼-mile walkshed and ½-mile bikeshed of Carnegie Library, including existing Metrorail, Metrobus, DC Circulator, Loudoun Commuter Bus and proposed DC Streetcar routes and stops. Because the site is anticipated to generate fewer than 25 peak hour bus trips, an assessment of existing bus system capacity was not conducted. Figure 3-17 shows existing public transit facilities and routes.

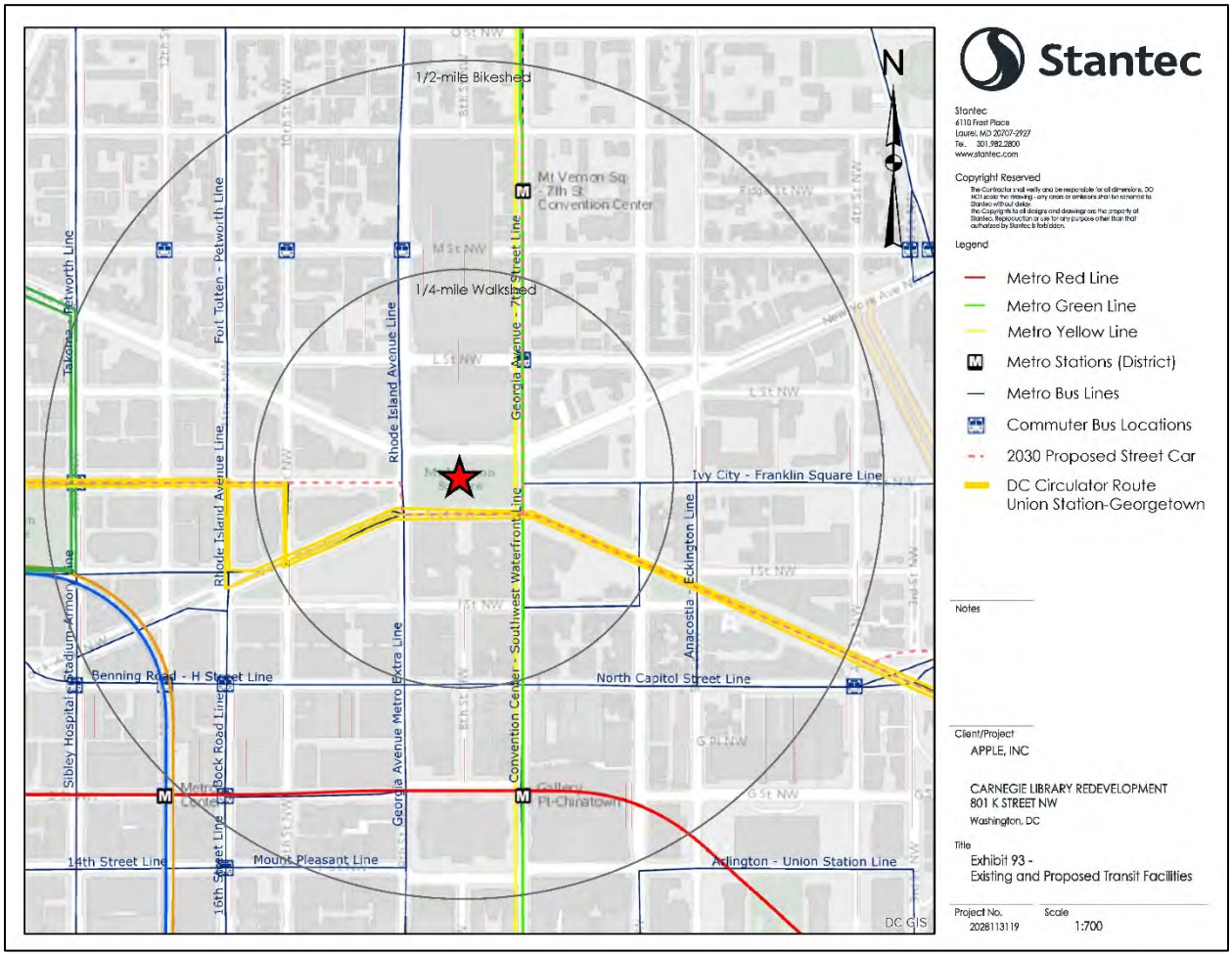


Figure 3-17. Existing and Proposed Transit Facilities

Parking Facilities

The area surrounding the Carnegie Library site restricts on-street parking by type and time of day. As such, the available on-street parking for cars during both PM and Saturday peak hours was identified within a two-block walking distance of the site and is shown in Exhibits 95 and 96 in Appendix A.

3.6.4.1 Surface Parking

There are six (6) off-street surface parking lots within walking distance of the Carnegie Library. The operating hours of the lots are noted below in Table 3-7 and shown in Figure 3-18 and Figure 3-19. The two sites highlighted in the table are those that lie within one block of the site and were included in the vehicle distribution analysis.

3.6.4.2 Garage Parking

There are seventeen (17) off-street subterranean parking garages within walking distance of the Carnegie Library. The operating hours of the lots are noted below in Table 3-8 and shown in Figure

3-18 and Figure 3-19. The sites highlighted in the table are those that lie within one block of the site and were included in the vehicle distribution analysis.

Table 3-7: Study Area Surface Parking Lots

Lot	Operating Hours
900 New York Avenue NW, PMI Parking Lot	Seven days a week, 24 hours a day
1001 6th Street NW	Monday – Friday 6:00 AM – 7:00 PM Saturday – Sunday 8:00AM – 5:00 PM
1016 6th Street NW	Seven days a week, hours unknown
915 5th Street NW	Monday – Saturday, 5:30 AM – 8:00 PM
622 I Street NW	Monday through Saturday, hours unknown
615 H Street NW	Monday through Saturday, hours unknown

Table 3-8. Study Area Garage Parking

Lot	Operating Hours
Marriott Marquis	Seven days a week, 24 hours a day
901 K Street NW	Seven days a week, 7:00 AM – 7:00 PM
1100 L Street NW	Seven days a week, 7:00 AM – 7:00 PM
1101 New York Ave NW	Monday – Friday 6:00 AM – 7:00 PM Saturday 6:00 AM – 4:00 PM Sunday 8:00 AM – 4:00 PM
1050 K Street NW	Monday – Friday 7:00 AM – 7:00 PM
1099 New York Ave NW	Monday – Friday 7:00 AM – 11:00 PM Saturday 10:00 AM – 11:00 PM
Embassy Suites	Seven days a week, 24 hours a day
901 New York Avenue NW	Monday – Friday 7:00 AM – 7:00 PM
845 11th Street NW	Monday – Friday 6:00 AM – 12:00 AM Saturday 9:00 AM – 7:00 PM
870 9th Street NW (City Center DC)	Seven days a week, 24 hours a day
The Victor Building	Monday – Friday 6:00 AM – 7:00 PM
999 9th Street NW	Seven days a week, 24 hours a day
650 Massachusetts Avenue NW	Monday – Friday 6:30 AM – 6:30 PM
600 Massachusetts Avenue NW	Seven days a week, 6:00 AM – 1:00 AM
500 H Street NW	Seven days a week, 24 hours a day
Hampton Inn	Seven days a week, 24 hours a day
601 Massachusetts Avenue NW	Monday – Friday 7:00 AM – 8:00 PM

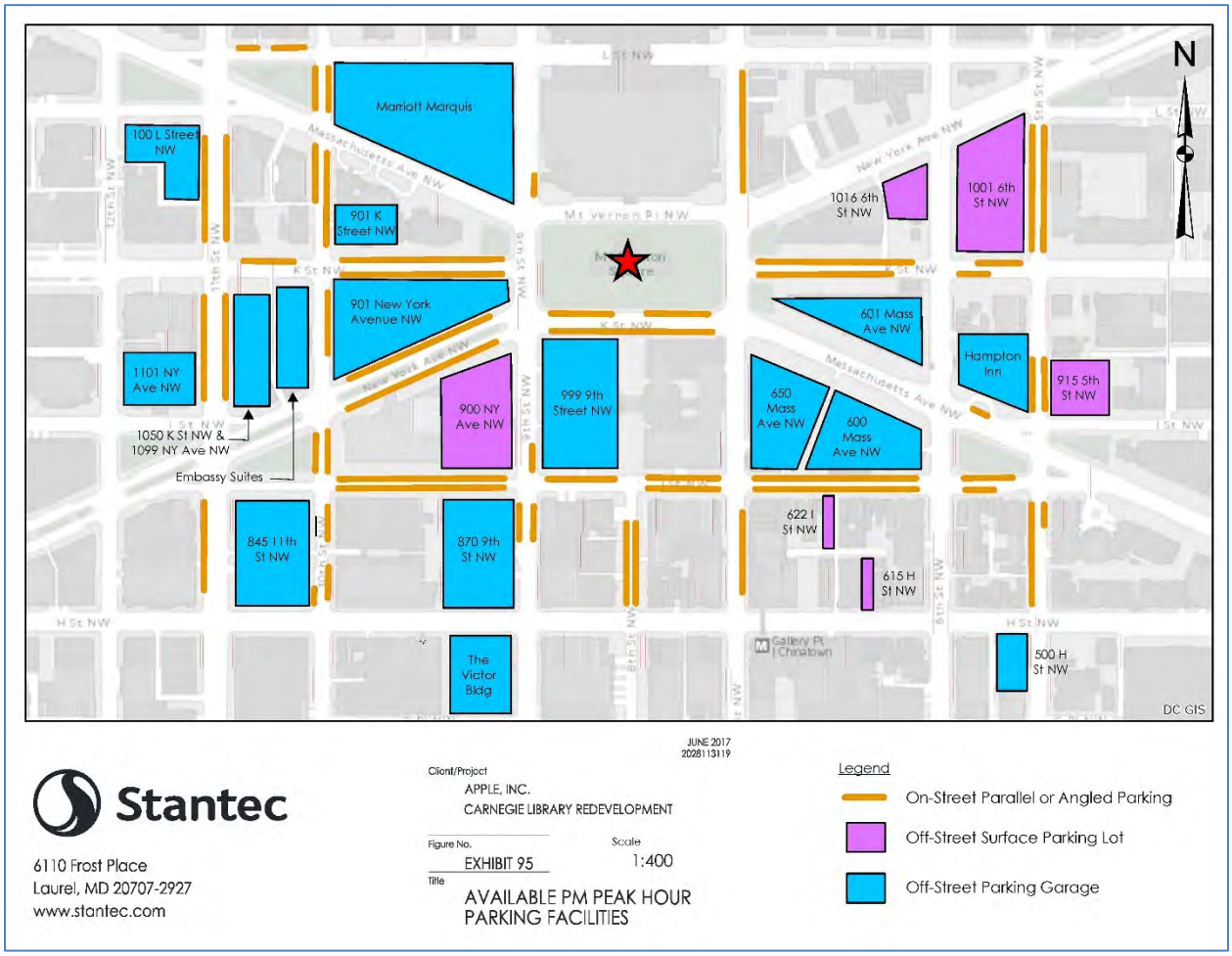


Figure 3-18. Available PM Peak Hour Parking Facilities

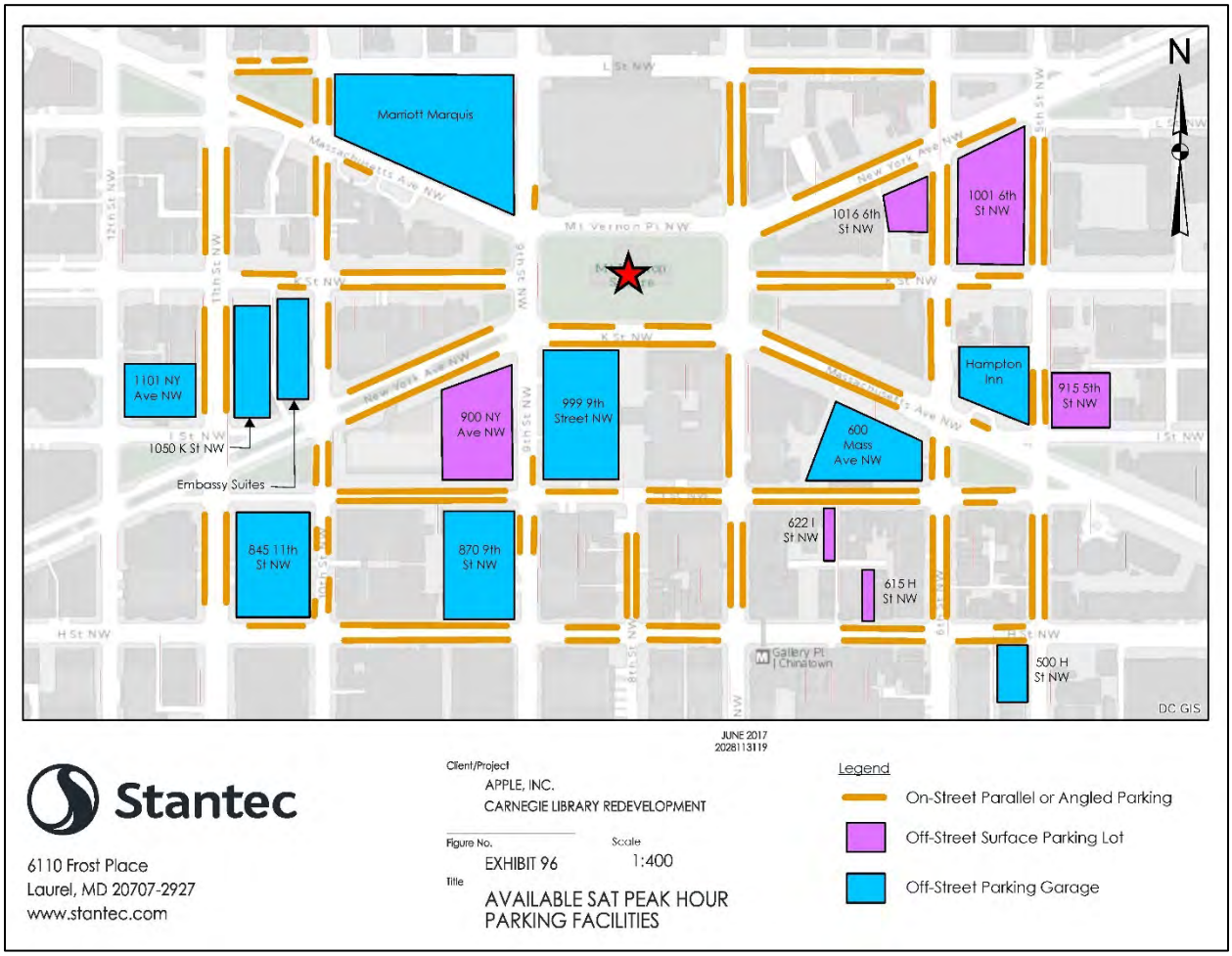


Figure 3-19. Available Saturday PEAK Hour Parking Facilities

Loading

The current Truck and Bus Through Routes and Restrictions map, published by DDOT in 2014, shows that all roads within the study area, with the exception of K Street NW east of 7th Street NW, are designated truck routes with no restrictions. Therefore, freight/delivery vehicles would continue to utilize the existing driveway and loading dock on Mt. Vernon Place NW for access and loading activities. The retail tenant has stipulated that deliveries would occur outside of the AM (7:00 AM – 10:00 AM) and PM (3:00 PM – 7:00 PM) peak periods.

3.6.5 How Would Bicycle, Pedestrian, Public Transportation, and Parking Facilities be Affected by the Project?

No Action Alternative

Bicycle and pedestrian access is currently provided to the Carnegie Site under the No Action Alternative. No impacts to the pedestrian, bicycle, public transit, or parking facilities would occur.

Action Alternative (Alternative A)

Under Alternative A, pedestrian and bicycle access to the Carnegie Library would not be impacted by the proposed project. The site currently provides access for pedestrians and bicyclists. Pedestrian and bicycle access to the site would continue under Alternative A. Public Transit is also located nearby.

The Carnegie Library site generates a relatively low maximum parking demand of 125 vehicles in the PM peak hour and 158 vehicles on a Saturday peak hour. The parking demand for the proposed retail facility (evening and weekends) would correspond with times of lower utilization at the nearby surface and structured parking facilities because the surrounding land uses consist primarily of office space. In addition, nearby site-specific developments include sub-surface parking, thus reducing the potential demand on the existing nearby parking facilities. Therefore, it is assumed that the need for parking would be easily accommodated within the 21 nearby off-street parking facilities, as well as on-street parking. Therefore, there would be no impact to parking as a result of Alternative A.

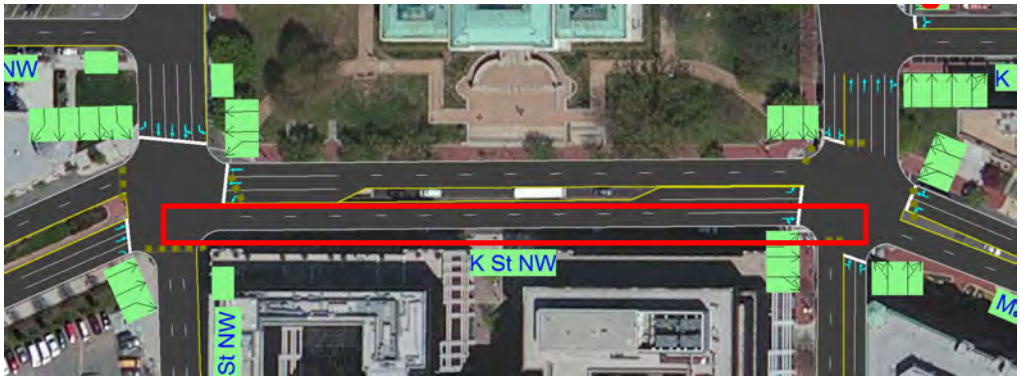
3.6.6 Whare are the Cumulative Effects of the Proposed Action?

Past, present, and future development in the area would place additional demands on the transportation network within the District. The rehabilitation of the Carnegie Library would contribute to these long-term, adverse cumulative impacts by including a retail establishment within the Carnegie Library.

3.6.7 What Mitigation Measures would be Taken to Reduce the Impacts to the Transportation Network?

Mitigation measures that would address the additional intersection delay while considering multi-modal transportation needs and potential right-of-way impacts are shown in Table 3-9. These mitigation measures are preliminary. The retail tenant and DDOT would continue to coordinate on the appropriate mitigation necessary for the proposed project.

Table 3-9. Potential Mitigation Measures

Mitigation Measure
A. Upgrade all study area signalized intersection to be fully actuated and optimize phasing and offsets.


Mitigation Measure	
B. Remove on street parking on one side of K Street to provide an exclusive left turn lane on WB K Street at the intersection of 9th Street with New York Avenue NW. Revise the phasing to include a protected/permitted WB left turn. It may be possible provide a shift in the through lanes to avoid a complete removal of on-street parking.	C. Remove on-street parking on one side of K Street to provide an exclusive left turn lane on EB K Street at the intersection of 9th Street with New York Avenue. It may be possible provide a shift in the through lanes to avoid a complete removal of on-street parking.

It should be noted that measures B and C would need to be coordinated with the future DC Streetcar project. Furthermore, it is recommended that these mitigation measures be evaluated after the retail site opens to determine if they are warranted. The anticipated additional vehicle trips analyzed in this report were estimated utilizing data obtained at similar retail sites. However, given the existing and projected background congestion in the study area during the PM peak period, and the ample number of retail locations elsewhere in the DC metropolitan area, it is unlikely that PM peak hour trips would be generated from suburban communities outside of DC. Therefore, non-auto mode share may be higher than anticipated. A post-development survey may help to evaluate actual customer travel patterns, and determine if the more significant enhancements, such as the removal of on-street parking to accommodate left-turn bays are needed. The potential for bike racks could also be warranted.

3.7 ECONOMY, EMPLOYMENT, AND INCOME

3.7.1 What are the Economic Characteristics of the Area Surrounding the Carnegie Library?

Washington, DC serves as the economic core of the Washington Metropolitan Area, which includes Northern Virginia, central and southern Maryland, and West Virginia. This overall area has 6.1 million residents, 3.28 million jobs, and a gross domestic product (GDP) of $491 billion, which is the fifth largest in the country (Washington DC Economic Partnership, 2010).

While the federal government is a substantial contributor to the District and regional economy, the private sector has been responsible for the majority of the economic growth in the District since 2012. The DC Economic Strategy Report states that the District intends to grow the private sector economy to $100 billion by 2021 (DMPED, 2017). In order to capitalize on the growth of the private sector and diversify the economy, the *Comprehensive Plan for the National Capital – District Elements* recommends providing support to industries with the greatest potential for economic growth, such as technology, retail, and international business.

Data from the American Community Survey (ACS) 5-Year Estimates from 2011-2015 and the most current data from the Bureau of Labor Statistics (BLS) were used to determine key financial and employment characteristics of residents located in the vicinity of the Carnegie Library and the District and how these areas compare to the United States as a whole. The Carnegie Library is located in Census Tract 58, which was used to represent the project area for the purposes of this analysis (U.S. Census Bureau, 2017).

Over half of working residents in the District are employed in management and business occupations, followed by sales and office occupations (Figure 3-21). The three most common industry types in the District include the Professional, Scientific, Management, Administrative, and Waste Management industry; the Education, Healthcare, and Social Assistance industry; and Public Administration (Figure 3-20).

The unemployment rate, median household income, and percentage of the population below the poverty level for Census Tract 58, the District, and the U.S. are shown in Table 3-10 below.

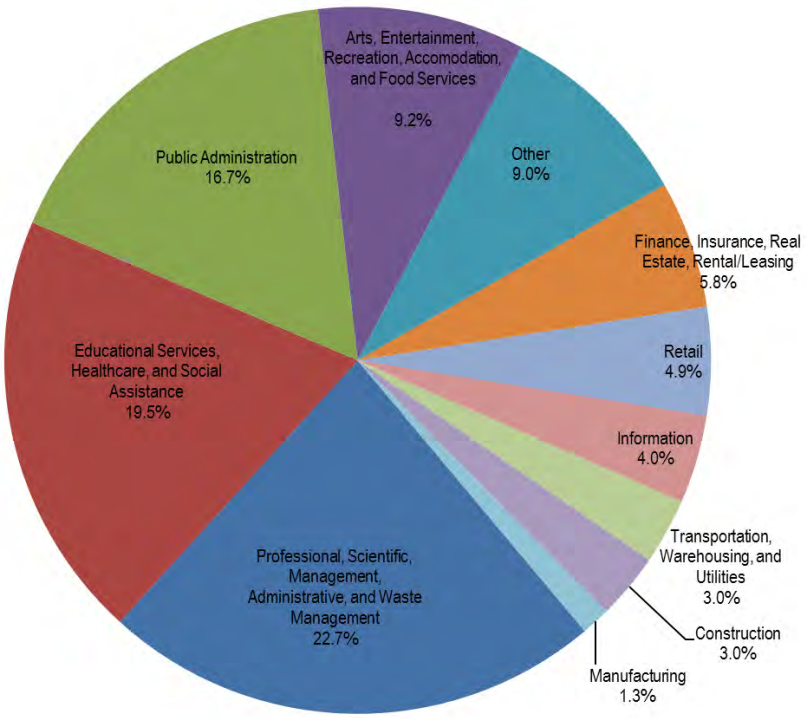


Figure 3-20. Industry Types in DC (ACS 2011-2015)

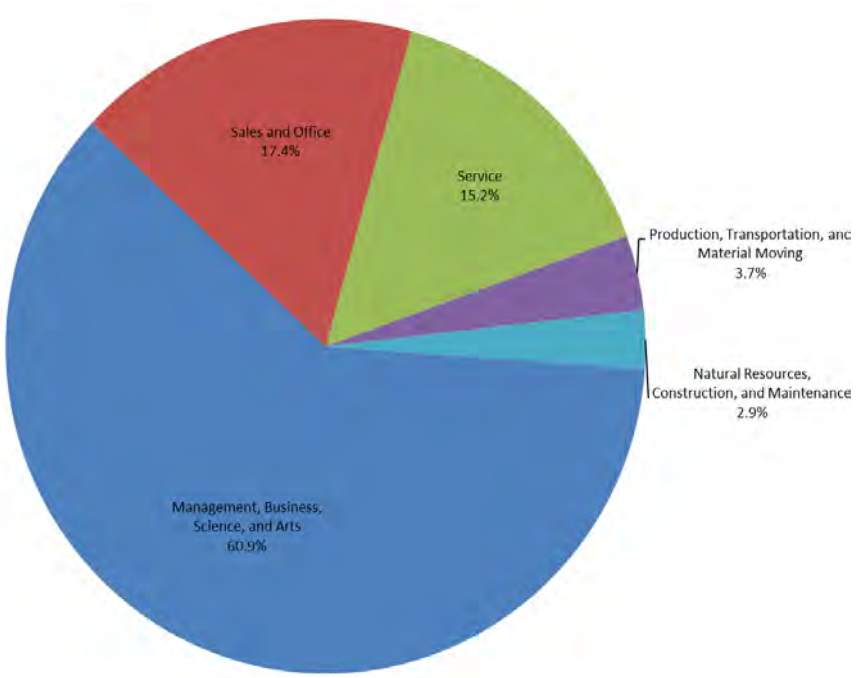


Figure 3-21. Occupations of Working Population of DC (ACS 2011-2015)

Table 3-10. Employment and Income Characteristics of the Carnegie Library Project Area

Characteristic	Census Tract 58	DC	National Average
Unemployment Rate (Feb 2017)	5.6%	5.7%	4.7%
Median Household Income	$124,306	$70,848	$53,889
Percent Below Poverty Level	16.4%	18.0 %	15.5%

As of February 2017, the District's unemployment rate was 5.7 percent, higher than the national average of 4.7 percent (BLS, 2017). The percentage of unemployed individuals in Census Tract 58, in which the Carnegie Library is located, is 5.6 percent, which is lower than the District unemployment rate but higher than the national average. According to the DC Comprehensive Plan, the District is projected to add 125,000 jobs over the next 20 years. The District's goal is to link these jobs to District residents rather than commuters from Maryland or Virginia in an effort to reduce the unemployment rate in the city (DCOP, 2011a).

The median household income in the District is $70,848, which is higher than the national average of $53,889 (U.S. Census, 2017). The median household income in Census Tract 58 is $124,306, almost double that of the District as a whole.

The percentage of individuals living below the poverty level in the District is 18 percent, which is higher than the percentage of individuals in Census Tract 58 (16.4 percent) and the United States (15.5 percent).

3.7.2 What Impact would the Proposed Action Have on the Local and Regional Economy?

No-Action Alternative

Under the No-Action Alternative, the rehabilitation and modernization of the Carnegie Library would not occur. No improvements would be made to the building. No new employment opportunities would be created. Events DC would continue to generate revenue through special event rentals. The trend of economic growth within the Mount Vernon Square and Shaw neighborhoods would likely continue in accordance with the District's plans and goals for revitalization. Therefore, there would be a long-term, beneficial impact to the local and regional economy as a result of the No-Action Alternative.

Action Alternative (Alternative A)

The rehabilitation and modernization of the Carnegie Library is consistent with the District's goals to support technological and international industries, grow the private sector economy and tax base, create more jobs and revenue for the District, and diversify the economy.

On a local level, the addition of a new retail tenant in the Carnegie Library would contribute to the current trend of economic growth in the Mount Vernon Square and Shaw neighborhoods, which has already attracted restaurants, hotels, luxury residences, and high-end retail. Economic growth would likely occur regardless of the addition of a new retail tenant. The addition of a new retail tenant in the Carnegie Library would remove several spaces that are currently used by Events DC to host special events. However, it is anticipated that the new tenant would provide some compensation to Events DC at the beginning of the lease to offset the estimated lost revenue from special events. Events DC would still have rights to use non-retail areas of the Library for special events, therefore continuing to generate revenue and attract local and non-local visitors.

The rehabilitation and modernization of the Carnegie Library would result in a minor, beneficial, long-term, direct and indirect impact on the local and regional economy.

3.7.3 How would the Proposed Action Affect Employment within the Area?

No-Action Alternative

Under the No-Action Alternative, the rehabilitation and modernization of the Carnegie Library would not occur. No new employment opportunities would be created. HSW would continue to lease office space from Events DC in the building, and the number of employees would be unaffected. Therefore, there would be no impact to employment as a result of the No-Action Alternative.

Action Alternative (Alternative A)

The addition of a new retail tenant in the Carnegie Library would create permanent jobs for DC area residents, including sales, customer support, and leadership/management positions. It is expected that approximately 100 employees would be added to the workforce. HSW would continue to lease office space from Events DC in the building, and the number of employees would be unaffected. The increase in employment opportunities would create a minor, long-term, direct, beneficial impact to employment in the area.

The rehabilitation and modernization of the Carnegie Library would result in a short-term need for construction workers; however, the number of required workers would be minimal, and this increase in temporary workers would not affect the population, income, or employment base of the surrounding community or the District. The increase in construction workers would result in a negligible, short-term, beneficial increase in employment opportunities.

3.7.4 How would the Proposed Action Impact Taxes and Revenue?

The Carnegie Library is owned by the District of Columbia and administered by Events DC, the convention and sports authority branch of the District government. Events DC generates operating revenue through conventions and meetings, sports and entertainment events, parking, advertising, and retail and office space leases. Events DC's non-operating revenue comes from dedicated taxes from the District, stemming from hotel occupancy, restaurant and beverage sales, and car rentals; Tax Increment Financing (TIF) revenue; subsidies; and interest. In Fiscal Year (FY) 2016, Events DC as a whole generated a total of $30.4 million in operating revenue and received $146.6 million in non-operating revenue, for a total of $177 million in overall revenue. Retail and office space rentals generated a total of $701,000 (2 percent of operating revenue and 0.4 percent total revenue). Special events rentals and ancillary services generated a total of $21,218,000 (70 percent of operating revenues and 12 percent of total revenue). Events DC received a total of $123.6 million in dedicated taxes in 2016, which accounts for 70 percent of their total FY 2016 revenue (Events DC, 2016).

The Carnegie Library, specifically, generates operating revenues from the sale and use of meeting and exhibition space, as well as commissions for ancillary services such as telecommunications, audio-visual, electrical, and catering services for special events. The Library includes 75,000 square feet of event space, a 150-seat theater, and nine rentable rooms.

No-Action Alternative

Under the No-Action Alternative, the rehabilitation and modernization of the Carnegie Library would not occur. No improvements would be made to the building. No new employment opportunities would be created. Events DC would continue to generate revenue through its existing lease with HSW and special event rentals. The trend of economic growth within the Mount Vernon Square and Shaw neighborhoods would likely continue in accordance the District's plans and goals for revitalization. Through this economic growth, the area surrounding the Carnegie Library would continue to see an increase in taxes and revenue, resulting in a long-term, beneficial impact to taxes and revenue.

Action Alternative (Alternative A)

Under Alternative A, the new retail tenant would pay market rent and operating expenses to Events DC for the duration of a ten-year lease. The addition of a retail tenant in the Carnegie Library would remove several event spaces. However, it is anticipated that the new tenant would provide some compensation to Events DC at the beginning of the lease to offset the estimated lost revenue from special events. Events DC would still have rights to use non-retail areas of the Library for special events. HSW would continue to lease their existing spaces for the duration of their 99-year lease. Any retail tenant would pay DC business taxes and generate increased revenue from sales taxes. Additionally, employees of the retail store would pay income taxes. Most of the renovation costs would be incurred by the new tenant, so no taxpayer dollars would be required.

The rehabilitation and modernization of the Carnegie Library would result in minor, long-term, direct and indirect, beneficial impacts to taxes and revenue.

3.7.5 What are the Cumulative Effects of the Proposed Action on Economy, Employment, Taxes, and Revenue?

Past, present, and future development in the District and the Mount Vernon Square area has created revenue for the DC government and additional jobs for District residents, which has created beneficial cumulative impacts on economy, employment, and income. The rehabilitation and modernization of the Carnegie Library would add to these long-term beneficial cumulative impacts from the introduction of a retail tenant.

3.7.6 What Measures would be Taken to Reduce the Impact on the Local and Regional Economy, Employment, Taxes, and Revenue?

It is anticipated that the new tenant would provide some compensation to Events DC at the beginning of the lease to offset the estimated lost revenue from special events.

3.8 COMMUNITY FACILITIES AND SERVICES

The following section describes community facilities and services in the vicinity of the project area including law enforcement, emergency response, fire protection, healthcare services, local schools and school systems, parks, recreational facilities, and designated open space.

3.8.1 What Community Facilities and Services are Located Near the Carnegie Library?

The Carnegie Library is a community resource that currently functions as the headquarters of HSW. It houses the administrative offices, archival storage, exhibit galleries, and research functions of HSW, including the Kiplinger Research Library. The Kiplinger's collections include artwork, documents, maps, objects, photographs, genealogical records, and rare books. The Society also provides research programs and workshops for local students, community groups, universities, and members. The Kiplinger Research Library is open to the public Tuesday through Friday from 10:00 a.m. to 4:00 p.m. Access to the collections and library is free, but appointments are required. The Carnegie Library also serves as a special events venue for galas, weddings, receptions, holiday parties, tech

events, and press events. The building includes 75,000 square feet of event space, a 150-seat theater, and nine rentable rooms.

The Carnegie Library is served by the District's First Police District (101 M Street SW, approximately 2.3 miles driving distance from the project area), PSA 102.

The DC Fire and EMS Department provides fire and rescue services for the Carnegie Library. The closest stations are located at Engine Company 16 at 1018 13th Street NW (approximately 1900 feet due east); and Engine Company 06 located at 1300 New Jersey Ave NW (approximately 2700 feet northwest). Response times to the Carnegie Library from these locations vary.

Several hospitals are located in the vicinity of the proposed project. These include Howard University Hospital (1 mile north), George Washington University Hospital (1.5 miles west), and BridgePoint Hospital Capitol Hill (1.6 miles southeast).

The Carnegie Library falls within the school district boundaries for Thomson Elementary School (1200 L Street, NW), Shaw Middle School (2001 10th St, NW), and Cardozo Education Campus (1200 Clifton Street, NW).

In addition to the Carnegie Library, the MLK Jr. Library is located at 901 G Street, NW, approximately 1100 feet southwest. A U.S. Post Office is located across K Street from the Carnegie Library to the south at 800 K St, NW. The Mount Vernon Place United Methodist Church is located at 900 Massachusetts Ave, NW, which is adjacent to the Library to the west. Sixth & I Historic Synagogue is located at 600 I Street, NW (approximately 750 feet southeast).

No public schools, parks, recreation facilities, playgrounds, or designated open space areas are located adjacent to the Carnegie Library. Businesses and public facilities in the area include the Washington Convention Center, museums, theaters, restaurants, clothing stores, and other retail businesses. Other services found near the Carnegie Library include, but are not limited to, trash collection and mail service.

3.8.2 How Would the Proposed Action Impact Community Facilities and Services?

No-Action Alternative

Under the No-Action Alternative, the rehabilitation and modernization of the Carnegie Library would not occur. No improvements would be made to the building. HSW would continue to lease their existing spaces and provide research and education opportunities at the Carnegie Library. Events DC would continue to host special events, and no changes to the amount of available rental space would occur. No changes in building usage would occur; therefore, no increase in emergency services would be required and no increase in police or fire and EMS response times is anticipated. The No-Action Alternative would not result in the removal or alteration of any adjacent properties or facilities. Therefore, the No-Action Alternative would have no impact on community facilities and services.

Action Alternative (Alternative A)

The rehabilitation and modernization of the Carnegie Library would remove several event spaces. However, Events DC would still have rights to use non-retail areas of the Library for special events and meetings. HSW would continue to lease their existing spaces and provide research and education opportunities for the duration of their 99-year lease. No long-term impacts to the Kiplinger Research Library would occur.

The new retail tenant would provide new community services and events. The store would potentially host concerts, forums, , and children's events at the Carnegie Library. Public Wi-Fi may also be provided. The proposed project would not result in any permanent changes to traffic volumes or patterns; therefore, no impacts to police or fire and EMS response times are anticipated. The proposed project would not result in the removal or alteration of any adjacent properties or facilities. Overall, the rehabilitation and modernization of the Carnegie Library would result in minor, long-term, direct, beneficial impacts to community facilities and services.

During construction, the rehabilitation and modernization of the Carnegie Library would be coordinated with Events DC to avoid conflicts with or disruptions to special events. Construction activities for the rehabilitation and modernization of the Carnegie Library could result in a temporary increase in noise, vibrations, dust, and changes in access. Therefore, HSW and the Kiplinger Research Library would be temporarily relocated during construction. The temporary location for HSW has not yet been determined. Some temporary impacts related to construction noise may affect places of worship, businesses, and public facilities in the vicinity of the project. These impacts would be short-term and would only occur during construction hours – Monday through Saturday from 7 am to 7pm, as designated by the DC Department of Consumer and Regulatory Affairs (DCRA, 2015). During construction, one lane of 9th Street, NW and the sidewalk to the west of the project area would be temporarily closed between Mount Vernon Place and K Street, NW to allow for loading, deliveries, and dumpster staging. Sidewalks along the north and south of the Carnegie Library site would also be temporarily closed for up to six months. Directional signs would be provided to direct pedestrians to alternate paths of travel during construction, in accordance with DDOT pedestrian safety and work zone standards (DDOT, 2007). Due to the temporary relocation of HSW and the Kiplinger Research Library, temporary construction noise impacts, and temporary sidewalk and road closures, the Action Alternative would result in minor, short-term, direct, adverse impacts to community facilities and services.

3.8.3 What are the Cumulative Effects of the Proposed Action on Community Facilities and Services?

Past, present and future development has adversely and beneficially impacted community facilities and services within the District and the Mount Vernon Square area, which has created cumulative impacts to community facilities and services. The rehabilitation and modernization of the Carnegie Library would beneficially contribute to the long-term cumulative impacts to community facilities and services from the creation of opportunities for cultural events, education, and entertainment, as well as a retail store that would draw more visitors to the Library and to Mount Vernon Square.

3.8.4 What Measures Would be Implemented to Reduce Adverse Impacts to Community Facilities and Services?

Construction activities for the rehabilitation and modernization of the Carnegie Library would only occur during construction hours – Monday through Saturday from 7am to 7pm, as designated by DCRA (DCRA, 2017). However, if construction would need to occur after hours an after hours permit would be obtained. HSW and the Kiplinger Research Library would be temporarily relocated during construction. The temporary location for HSW has not yet been determined. Due to sidewalk and road closures, directional signs would be provided to direct pedestrians to alternate paths of travel during construction, in accordance with DDOT pedestrian safety and work zone standards (DDOT, 2007). It is anticipated that the new tenant would provide some compensation to Events DC at the beginning of the lease to offset the estimated lost revenue from special events.

3.9 ENVIRONMENTAL CONTAMINATION AND HAZARDOUS MATERIALS

3.9.1 What Environmental Contamination or Hazardous Materials Concerns have been Identified within the Carnegie Library?

Soil and Groundwater Contamination

In March 2017, an Environmental Due Diligence Assessment was conducted by Environmental Resource Management (ERM) (ERM, 2017). The purpose of this assessment was to identify environmental conditions in connection with the site through site reconnaissance, a review of reasonably ascertainable regulatory and historical documentation, and sub-slab soil gas sampling. The assessment identified the following environmental condition: A Leaking Underground Storage Tank (LUST) incident was reported during construction of the Washington Convention Center in 1999. The LUST incident involved a release of gasoline and heating oil, which impacted soil and groundwater. Since the Convention Center site is hydrologically upgradient from the Carnegie Library site, there is a possibility that these spilled materials may have migrated onto the Carnegie Library site. To evaluate the risk of vapor intrusion of these materials within the Carnegie Library, sub-slab soil gas samples were collected in the Library basement. Petroleum hydrocarbons and chlorinated volatile organic compounds (VOCs) were identified; however, the concentrations of these compounds were well below EPA vapor intrusion standards for residential and commercial properties. No other soil or groundwater contamination concerns were identified.

Hazardous Building Materials

Due to the age of the building, which was originally constructed in 1902, there is a possibility that hazardous building materials such as asbestos and lead may have been used during construction. The EPA National Emission Standards for Hazardous Air Pollutants (NESHAPS) (40 CFR 61) require that an appropriate asbestos inspection be conducted prior to construction or demolition activities that could potentially disturb asbestos-containing materials (ACMs). An ACM is defined by the EPA as any material containing greater than one percent asbestos by weight upon Polarized Light Microscopy (PLM) analysis. All ACM must be handled in accordance with Subpart M of the NESHAPS regulations and the Occupational Safety and Health Administration (OSHA) Asbestos Standard for the Construction Industry (29 CFR 1962.1101). Lead-based paint (LBP) is defined as paint containing

more than 1.0 milligrams per square centimeter (mg/cm^2) lead by DCR 6-997 and U.S. Department of Housing and Urban Development (HUD). Painted and glazed surfaces that contain detectable concentrations of lead, including concentrations less than the definition of LBP, are considered lead-containing paint (LCP). All LBP and LCP must be handled in accordance with the OSHA Lead in Construction Standard (29 CFR 1926.62).

A hazardous materials inspection of the Carnegie Library was conducted by Aerosol Monitoring and Analysis (AMA) on January 17, 2017, in an effort to identify ACMs, LBP, and LCP. The findings were summarized in a report titled "Hazardous Materials Report For Carnegie Library" (AMA, 2017). A total of 52 bulk samples of suspected ACM were taken. Three of these samples, located in yellow and black floor tile mastic, contain greater than one percent asbestos and are therefore considered ACM as defined by the EPA. Other suspected ACMs that were inaccessible at the time of the survey include fire doors, elevator cab insulation, terrazzo, felt paper, and pipe and pipe fitting insulation enclosed behind walls with water or wastewater utility piping. These materials are considered assumed ACM. AMA also conducted testing for LBP. Eleven of the 105 surfaces tested met the federal definition of LBP, including plaster walls and ceilings, door cases, wall rails, and decorative railing spindles.

Mold

In September 2016, mold was discovered in two areas within the Carnegie Library. Exposure to mold or airborne mold spores can result in allergic reactions, asthma, and other respiratory complaints. Additionally, mold eventually destroys the material it colonizes, which leads to costly repairs. The building was closed to the public and staff in September 2016 and reopened in January 2017 after a successful environmental remediation (HSW, 2016). AMA conducted an additional mold survey in 2017. As a result of this survey, additional mold spores were identified on the inside surfaces of the HVAC supply diffusers and ductwork; baseboards within the Roosevelt Studio; and the ceiling area in the 1st floor east room (AMA, 2017).

3.9.2 How would the Proposed Action Impact Environmental Contamination and Hazardous Materials?

No-Action Alternative

Under the No-Action Alternative, the rehabilitation and modernization of the Carnegie Library would not occur. The No-Action Alternative represents a continuation of the existing conditions, operations and maintenance of the Carnegie Library. No subsurface excavation or ground disturbance would occur; therefore, the likelihood of encountering contaminated soil or groundwater is negligible. If ACM or LBP are to be disturbed, then they would be abated in accordance with Subpart M of the EPA NESHAPS regulations, the OSHA Asbestos Standard for the Construction Industry, and the OSHA Lead in Construction Standard. The additional mold that has been identified in the building would be removed by a DC licensed mold professional to the standards set by DC and federal regulations to safeguard the health of building occupants. Therefore, the No-Action Alternative would have a long-term, beneficial impact related to environmental contamination.

Action Alternative (Alternative A)

Hazardous materials remediation would be performed as part of the overall rehabilitation and modernization of the Carnegie Library. ACM and LBP would be abated in accordance with Subpart M of the EPA NESHAPS regulations, the OSHA Asbestos Standard for the Construction Industry, and the OSHA Lead in Construction Standard. The additional mold that has been identified in the building would be removed by a DC licensed mold professional to the standards set by DC and federal regulations to safeguard the health of building occupants.

Construction and demolition activities would result in the temporary disturbance of hazardous materials, which may cause them to become airborne. This would result in increased health risks to construction workers. However, the above referenced regulations include remediation practices designed to avoid and minimize the exposure of construction personnel to air toxics. Construction and demolition activities may generate other hazardous wastes from painting, carpentry, and vehicle and equipment maintenance. Wastes generated could include solvents, fluorescent bulbs, batteries, acids/bases, used oil, ignitable waste, and lead-containing waste (DOEE, 2017b). Therefore, the project would require registration with DOEE as a Hazardous Waste Generator. Because of the disturbance to hazardous building materials and the potential to generate other hazardous wastes during demolition, the rehabilitation and modernization of the Carnegie Library would have a minor, short-term, direct, adverse impact during construction. However, the removal of hazardous building materials from the Carnegie Library would overall result in a moderate, long-term, direct, and beneficial impact related to environmental contamination and hazardous materials.

3.9.3 What are the Cumulative Effects of the Proposed Action Related to Environmental Contamination and Hazardous Materials?

Past, present and future development in the District has resulted in the disturbance of hazardous building materials. However, the removal of hazardous building materials and remediation of mold in the Carnegie Library and other historic buildings throughout the city would result in long-term, beneficial cumulative impacts from the use of proper remediation practices. Overall, the rehabilitation and modernization of the Carnegie Library would not contribute to adverse cumulative impacts related to hazardous materials.

3.9.4 What Measures would be Taken to Reduce Adverse Impacts Related to Environmental Contamination and Hazardous Materials?

ACMs that may be impacted by the renovations would be removed prior to renovation activities that would dislodge, disturb or otherwise affect these materials. Any materials assumed to contain asbestos would be sampled and analyzed to determine asbestos content prior to abatement. Asbestos abatement work would be in compliance with Subpart M of the EPA NESHAPS regulations and the OSHA Asbestos Standard for the Construction Industry. The demolition contractor would conduct an additional assessment for employee exposure to lead as required by the OSHA Lead in Construction Standard. All lead-containing waste would be handled and disposed of as hazardous waste as necessary. The additional mold that has been identified in the building would be removed by a DC licensed mold professional to the standards set by DC and federal regulations to safeguard the health of building occupants.

The project would be registered with DOEE as a Hazardous Waste Generator prior to construction, and all hazardous materials used during construction would be stored onsite in a designated area and disposed of in accordance with DCMR Title 20, Chapters 42-43.

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4. CONSULTATION AND COORDINATION

Events DC and NCPC place a high priority on public involvement in the NEPA process and on giving the public an opportunity to comment on the proposed action. As part of the NEPA process, issues associated with the proposed action were identified through internal meetings with Events DC and NCPC and have been communicated to other affected agencies and stakeholders. Agency consultation and coordination letters received to date are provided in Appendix B.

4.1 WHAT TYPE OF AGENCY COORDINATION WAS CONDUCTED?

In addition to NCPC review, the proposed project is subject to the review of the U.S. Commission of Fine Arts (CFA) as a public, District of Columbia-owned building. The project was presented in an informational capacity to the CFA on May 18, 2017. Events DC will submit final plans to CFA for their review and approval.

The project is also subject to the DC Historic Preservation Review Board (HPRB) as an individual landmark in the DC Inventory of Historic Sites. The project was presented in an informational capacity to HPRB on June 29, 2017 and received concept approval.

4.2 HOW HAS EVENTS DC AND NCPC CARRIED OUT COMPLIANCE WITH SECTION 106 OF THE NHPA?

Section 106 of the NHPA requires Federal agencies to consider the effects on their undertakings on historic properties. NCPC initiated Section 106 consultation with the DC HPO on April 21, 2017. NCPC held a Section 106 Consulting Parties meeting on May 17, 2017, during which the consulting parties were introduced to the project, presented with a draft APE, and invited to provide comments. A public comment period was open from May 17 to May 31, 2017. NCPC is currently preparing the documentation to notify DC HPO and the Advisory Council on Historic Preservation of its determination that the Carnegie Library project will cause adverse effects on the Library building. As a result, NCPC, Events DC, Apple, and DC HPO are developing a Memorandum of Agreement (MOA) to resolve those effects. At this time, NCPC anticipates it will host a second consulting party meeting in late summer 2017, to allow the consulting parties to comment on the Finding of Adverse Effect; the draft MOA; and associated avoidance, minimization, and mitigation measures.

4.3 WHAT OTHER AGENCY CONSULTATION WAS CONDUCTED FOR THE PROJECT?

On February 7, 2017, NCPC met with representatives from DDOT to initiate DDOT's Comprehensive Transportation Review (CTR) process. During this meeting, there was a general discussion of the need for a traffic impact study and CTR. The Design Team submitted the CTR Scoping form to DDOT on April 27, 2017. The draft Traffic Impact Study (Appendix D) includes the results of the traffic analysis and the CTR process.

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