Section 106 Assessment of Effects Report

Appendix B: Consulting Party Meeting Minutes and Written Comments Received

Martin Luther King, Jr. Memorial Library Rehabilitation & Modernization 901 G Street, NW, Washington, DC

November 20, 2015 | Prepared on behalf of the National Capital Planning Commission
Consulting Party Meeting #1/NEPA Scoping Meeting (October 7, 2014)
I've started to receive comments on MLK from our website and so I can forward them as I receive them. I think NCPC's public engagement office posted something on Twitter about the public comment period and that is what led to these first few emails. Who on the project team and from the library should I send these to? I don't want to inundate people with the comments/messages, but want to make sure anyone who needs to see the comments receives them.

Thanks,
Jennifer

Jose de Arteaga
Sent: Tuesday, September 30, 2014 8:57 PM
To: Hirsch, Jennifer
Subject: MLK Library Comment

Y'all at NCPC should watch the PBS special Broadway in the Hood and see how the Las Vegas Library incorporated this awesome public venue for the performing arts in their new library- really cool! poetry, plays, lectures, debates, films etc
October 22, 2014

Email: jennifer.hirsch@ncpc.gov

National Capital Planning Commission
Attn: Jennifer Hirsch
Suite 500 North
401 9th Street NW
Washington, DC 20004

Re: Martin Luther King Jr. Memorial Library Renovation and Expansion
(Project: #7610)

Dear Ms. Hirsch:

I am writing on behalf of the Committee of 100 on the Federal City regarding the proposed renovation and expansion of the Martin Luther King Jr. Memorial Library (MLK Library). Founded in 1923, the Committee's mission is to safeguard and advance the fundamental planning, environmental and aesthetic values that give Washington its historic distinction, natural beauty and overall livability. The Committee of 100 has long supported renovation of MLK Library and welcomes this opportunity to begin the process.

The following are the Committee of 100’s comments as the National Capital Planning Commission (NCPC) reviews proposals by the District of Columbia Public Library (DCPL) to renovate and rehabilitate MLK Library. The comments respond to NCPC consideration of the project’s compliance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). The Committee of 100 request that these comments be considered within the scope of issues to be addressed in the Environmental Assessment and through Section 106 consultation.

The Committee of 100 notes that a critical element for evaluating the design concepts is currently missing. MLK Library staff have undertaken an impressive public outreach to help identify the anticipated amounts and types of space needed within a new central library. However, this information has not yet been shared.
Providing a written architectural program which includes square footage calculations will allow the public to consider the need for proposals such as a fifth floor addition. We respectfully urge that this information be provided quickly so that it can be considered within the scope of the NEPA/Section 106 process.

Alternatives A-D

On behalf of the DCPL, the architects at Martinez+Johnson Architecture PC/Mecanoo have proposed four alternative concept designs labeled A-D. They range from simple renovation to adding four stories to the existing building and modifying other areas subject to its landmark status. NCPC has no preferred alternative and confirmed that elements from each alternative may be combined to later create a fifth concept design. Elements not currently proposed within the four concept designs may also be added to a fifth concept design. While the Committee of 100 generally supports Alternative A (no action beyond renovation), the other alternatives have some elements that would be beneficial to consider and pursue. The following comments respond to the major elements found within the four concept designs and support the creation of a fifth alternative.

Alternative E: Fifth Floor Addition

The fact that an extension of the existing outer curtain wall was not included as an alternative concept design proposal is a glaring omission. Mies anticipated such an addition and it should now be the basis for immediately including a fifth option, Alternative E, for the following reasons.

The 2007 landmark registration form for MLK Library cites the potential addition of one or two floors (Section 8 Page 9):

"As specified in Peterson’s Statement of Program, the building was expandable. As built, the library could house up to two million volumes of books but was designed to accommodate additional floors. In a library conference session, Milton, S. Byam, Director of D.C. Public Library and successor to Harry Peterson, indicates that one additional floor could be added to the building to accommodate an additional million volumes of books.32 Harry Peterson, in press reports at the time of the building’s initial design, however, is quoted as saying that the structure “will be so designed that one or two additional floors could eventually increase the library’s capacity to 3 million books.”33


Extending the design is an obvious solution that has been widely discussed. Jack Bowman, supervising architect for the Mies building when it was constructed, recently confirmed to the DCPL staff and architects that Mies designed the building with the extension option. The Freelon Group included an extension (below) as one option for consideration as part of a Sept. 2012 study prepared by the Urban Land Institute. The Committee of 100 passed a resolution in 2012 (attached) recommending an extension
if extra floors were deemed necessary. The Committee of 100 resolution was shared with DCPL staff and it’s Advisory Panel in June 2014 so the proposal was ripe for consideration as the four Section 106 alternatives were being prepared.

The Secretary of the Interior’s *Standards for Rehabilitation* provides guidance for ensuring that new additions, exterior alterations, or related new construction not destroy historic materials that characterize the property. The *Standards* have institutionalized the precept that new work be distinguishably different from the original structure. However, it should not be applied in so literal and inflexible a manner so as to remove rational options. In this instance, the option would be to extend the exterior already designed and sanctioned by the architect, Ludwig Mies van der Rohe. Such an option would be consistent with achieving the *Standards*’ ultimate goal of a compatible addition that protects the historic integrity of the property. What would be more compatible?

There is already a nearby precedent for taking such an approach: Dulles Airport. The main terminal was designed in 1958 by Eero Saarinen. The architect included a plan for expanding the building that was not fully realized until 1996. The result was a seamless extension which preserved one architectural vision. The same can be accomplished with the Mies structure.

If the Mies addition is not the obvious choice, how can we consider placing another architectural vision on top of the city’s only Mies-designed building? Can we identify any other Mies van der Rohe buildings with roof top extensions designed by other architects? Beyond the floor addition, why would it be acceptable to plant trees on top of a Mies building? Why would it be acceptable to allow people to wander around the roof so that they become part of the urban view plane seen from 9th and G Streets? Phrased differently, height restrictions have been placed on some distinguishably different projects whereby the new construction combined with the historic fabric cannot be seen from across the street at six feet high. Applying this principle, why would it then be acceptable to see trees and people on top of MLK Library? Why is there no concern that a non-Miesian addition could threaten MLK Library’s landmark designation?

Until recently, the Mies building has lived an uncomfortable life in Washington. Its minimalist architecture definitely fulfilled the precept of being “distinguishably different.” Other than the fact that its low level profile complimented the Patent Building across the street, MLK Library was largely incompatible with most of the downtown urban fabric at the time of its construction in 1972. It specifically clashed with the 1961 First Congregational United Church of Christ (FCUCC) building with which it shared the block, both in terms of style, materials and height.

That is no longer the case. The city is now home to a myriad of new, glass minimalist towers. Two neighboring structures have been specifically designed to pay homage to the Mies building:
the ten story FCUCC/Jamestown building constructed in 2012 and the nine story 900 G Street building nearing completion. They are 21st century minimalist gems placed as tributes to our 20th century minimalist landmark. Quite simply, the 900 block of G Street, NW has the chance of becoming an International Style architectural showcase once the library is renovated. Why would we compromise that vision?

By definition, minimalist architecture is reduced to its essential elements. For a Mies structure, it is a sophisticated design that achieves geometric balance and harmony with the least amount of materials. It is a singular vision. There is no balance and harmony when the viewer is confronted with a second architect’s distinguishably different vision.

Given the compelling evidence provided for a simple extension of the Mies design, the Committee of 100 respectfully requests that it be included as a fifth concept design (Alternative E) within the scope of the Environmental Assessment and Section 106 consultations.

Fifth Floor Design

Alternative B offers a stepped-back Miesian rectangular design as an option for the fifth floor. While the design is compatible, it includes outdoor patios allowing people to walk around the roof. As noted, the Committee of 100 opposes an outdoor terrace.

An extended Mies fifth floor would provide ample opportunity for a dynamic public space. It could include a glass ceiling allowing visitors to view the city from a spectacular enclosed, light-filled event space that would be available throughout the year. Similar to Alternative B, the building’s penthouse infrastructure would be enclosed within the fifth floor thereby creating a flat rooftop when viewed from the street.

The Committee of 100 opposes the curvilinear event space (Alternative C) and three-story addition (Alternative D) as “distinguishably different” designs that are incompatible with the Mies structure. The curvilinear roof design is a clumsy, amorphic shape. In contrast, an oval shape could be compatible since it would be symmetrical and the opposite of a rectangle. The three story angled bar is an unwelcome parody of the FCUCC/Jamestown building. It would block the view of the adjoining building and undermine its architectural inventiveness.

Attention must also be given to MLK Library’s height and color. Anything beyond five floors threatens to eliminate the juxtaposition and balance that currently exists with the neighboring buildings. The visual weight of MLK Library’s black color must also be taken into consideration, especially since the building will be repainted and likely appear a bit darker. The structure’s visual heaviness is now in accord with its surrounding buildings. This will not be the case if multiple floors are added.

Is a Fifth Floor Needed?

For the past decade, library officials have testified that MLK Library is too large. Therefore, it is a bit surprising that following recent public outreach, it has been determined that the building is actually too
small and needs an additional floor. While the Committee of 100 supports the efforts to reconstruct a facility that addresses the current and future needs of the community, we recommend that further analysis be undertaken to confirm the anticipated space demands. For context, MLK Library is 400,000 sq. ft., Seattle is 363,000 sq. ft. and Salt Lake City is 240,000 sq. ft. Since MLK Library was chronically underfunded for decades and allowed to deteriorate, we must seek guarantees that a newly enlarged building would not suffer the same fate.

**Public Cores & Loading Dock**

A redesign of the four public cores could be accomplished in a manner that is harmonious with the Mies architecture, including within the landmarked restoration zone. This could include installation of new glass-enclosed staircases that make building navigation more apparent and welcoming to the visitor. Nevertheless, the brick walls within the first floor reading rooms and central hall should remain intact since they are important contributing elements for visually defining those rooms within a minimalist vocabulary. Also, the new stairwell elements must be symmetrical and balanced, using Miesian proportions. For example, the staircase in Option B-2 is off-center and the glass/brick wall in front of the staircase is asymmetrical.

Elimination of the street level loading dock provides an opportunity to expand the central hall and visually connect the building with G Place. It should be possible to retain the central hall’s main east-west axis while adding a new north-south axis.

**Ground Floor Exterior**

*Brick Walls:* The exterior brick walls under the logia were originally intended to be clad in green marble and be flush with the rest of the building’s glass facade. This could be accomplished in a redesign and would be consistent with Secretary of the Interior’s *Standards for Rehabilitation* since it was part of the original Mies design and the choice of bricks was based on cost, not aesthetics. In fact, since the new FCUCC/Jamestown and 900 G St. towers have green-tinted glass, the green marble might be a dynamic complement that would also enhance the MLK Library entrance. Other materials might be acceptable such as the proposed etched glass. While the current brick walls are not as attractive as marble, they do serve as visual clues for locating the building entrance. Any replacement construction must achieve the same effect.

*Light Wells:* Alternatives C and D include a proposal for glass light wells in front of the current exterior brick walls. This is an innovative idea that raises a number of practical questions. How would you stop people from walking across it or playing on the glass? How would you keep it clean? If a fence is needed, this would not be very attractive and may not be harmonious with the Mies design. The glass light well would also reduce the amount of public space under the logia and become a barrier to pedestrian access.

*MLK Library’s West Side:* Public use of the open area on the building’s west side along with the adjoining pocket park shared with FCUCC/Jamestown needs to be fully explored. The current bike kiosk operation is an innovative experiment but other uses should also be considered. Turning the
pocket park into a sculpture garden honoring Martin Luther King, Jr. is just one example. Since the pocket park is shared with FCUCC/Jamestown, any use must be mutually agreed upon and simultaneously complement (and not obstruct) the Church’s green light box and gray brick wall.

**MLK Library’s North Side:** The G Place side of MLK Library has always been an underserved building element. It includes a loading dock and awkward brick walls and metal fencing installed to address security concerns and the inclined ground. Efforts to enliven the space with designs and materials consistent with the Mies vocabulary are welcomed.

**Interior**

The architects should be given freedom to design the building’s interior so as to create well-planned, rationale, exciting and engaging spaces. Any new designs must be compatible with the Mies vocabulary. Such elements might include square or rectangular designs and grids; use of glass, steel, brick and stone; and smooth and undecorated walls. If seeking to be distinguishably different within areas of the building not subject to a landmark designation, the design can pursue elements that provide a rationale and compelling compliment to the Mies vocabulary – circles, 45 or 60 degree angles, secondary colors, etc.

**Summary**

The Committee of 100 prefers retaining the current four-story structure. The Committee of 100 respectfully requests that a fifth concept design (Alternative E) consisting of a one-story extension of the Mies designed building be included within the scope of the current Environmental Assessment and Section 106 consultations in case a fifth floor is deemed necessary based on further analysis. The Committee of 100 supports a combination of compatible elements from the other four Alternatives described above within a newly renovated building although this should not include rooftop trees or outside access.

Thank you for this opportunity to share these comments. Feel free to contact me or C100 member Stuart Gosswein (202/777-1220, sgosswein@aol.com) if you have any questions.

Sincerely,

Nancy MacWood
Chair
RESOLVED, that the Committee of 100 on the Federal City advocates continued use of the Martin Luther King Jr. Memorial Library building as a library. Any renovation of the building should be consistent with the Design Guidelines published in conjunction with the landmark designation. If joint tenancy with the library is proposed for the building, necessitating the addition of floors to the building, those floors should be limited to one or two in number, as originally envisioned by the building's architect Mies van der Rohe, and should match the architect's original design of the building.
October 31, 2014

To Ms. Hirsch:

A public meeting was held on October 7, 2014, at the King Memorial Library whereby National Capital Planning officials (NCPC), along with DC Public Library officials (DCPL) explained that the MLK Library renovation must include a process called the NEPA Public Scoping and 106 Review.

Documents handed to the public at this October 7, 2014 public meeting included an MLK Scoping Meeting Presentation file, as seen online here >> http://www.ncpc.gov/DocumentDepot/MLK_Scoping_Meeting_Presentation_final.pdf

**Purpose of the NEPA/106 Review**

NCPC officials referenced the aforementioned MLK Scoping presentation document when explaining the purpose of the NEPA scoping review as it pertains to the renovation of our central public library.

On page 10 of this document, NCPC highlights the environmental issues and impact topics that will be taken into consideration for the NEPA 106 review, as follows:

**POTENTIAL ENVIRONMENTAL ISSUES & IMPACT TOPICS**

- Traffic and Transportation
- Scenic Resources/ Viewsheds
- Historic Structures and Districts
- Hazardous Waste/Hazardous Materials
- Land Use (public space, building use, planning policies, socioeconomics)
- Storm water
- Utilities
- Energy

On page 11, NCPC delves a bit more into the NEPA/106 process as having, "[t]he purpose of consultation to identify historic properties, assess adverse effects, and resolve those adverse
effects through avoidance, minimization, and mitigation strategies."

Researching this NEPA/106 process, we also came across a helpful manual called, "Preserving America’s Heritage, ADVISORY COUNCIL ON HISTORIC PRESERVATION, Protecting Historic Properties: A CITIZEN’S GUIDE TO SECTION 106 REVIEW" (http://www.achp.gov/docs/CitizenGuide.pdf).

On page 5 of this Citizen's Guide, particularly under the heading, "SECTION 106: WHAT IS AN ADVERSE EFFECT?,” one gets a further sense of what the NEPA/106 is evaluating:

Adverse effects can be direct or indirect and include the following:
• physical destruction or damage;
• alteration inconsistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties relocation of the property;
• change in the character of the property’s use or setting;
• introduction of incompatible visual, atmospheric, or audible elements;
• neglect and deterioration;
• transfer, lease, or sale of a historic property out of federal control without adequate preservation restrictions

Given the purpose of NEPA/106 process and topics under review, and given the limited information provide by DCPL to NCPC at this juncture about the possible future uses on top of the library, the District Library Dynamos concludes that the NEPA/106 review for the MLK Library renovation project is way too premature.

Premature NEPA/106 Review

At this stage, when evaluating all of the documents and written intentions currently on the public record, it can be argued that the NEPA/106 review is premature and will result in ill-informed and unsubstantiated reporting thus wasting public time and money. Why?

There are at least three outstanding key questions which demonstrate that the NEPA/106 process is premature at this point:
• What will go on the roof of our MLK Library, if anything?
• Who will the air rights and rooftop structures of our historic building be owned by?
• What type of land use and socio-economic impacts will these above decisions have on this historic library structure and surrounding federal interests?

Right now, NCPC has said they will consider four design alternatives, labeled A, B, C, or D, as found on page 15 of the aforementioned scoping presentation documents (http://www.ncpc.gov/DocumentDepot/MLK_Scoping_Meeting_Presentation_final.pdf).

Looking at alternatives B, C, or D, will the rooftop configurations and structures be public space with public purposes inter-related with the library or other public agency? Sadly, it seems there
is still a chance that the rooftop and air-rights will not be public.

Marcel Acosta, Executive Director of NCPC writes in his cover letter to David Maloney of the Historic Preservation Office, dated September 17, 2014,

“... the project may include the construction of additional space for non-library uses through the use of a public-private partnership.” ED Acosta goes on to write, “...the project... may entail leveraging the resources of a public/private partnership yet to be identified.”

The privatization question is a huge issue and the is the elephant in the Great Hall. This is the case even despite the fact that DC residents and library users have overwhelmingly rejected privatization at all of the DCPL-hosted public forums about the renovation of the King Memorial Library (no other central library is the world would have this type of public-private scheme).

If the roof structures found in B, C, or D are to be privatized and developed for private residential or office space, that means hundreds of people will reside and/or be working on a daily basis above the library. On its face, the impacts of this type of land-use is far greater than what would come from a publicly-controlled use-space.

NEPA/106 review of possible privatized residential and office space requires much more examination of impacts from much more significant and intensive energy, water, and other space needs and infrastructure that will have to be included in our historic library structure and space. For example, where will all the sewer pipes and electrical conduit run throughout our historic library to serve the private residences or offices above?

Maintenance issues going forward would also need serious, and long-term consideration, particularly if the private maintenance schedules don't meet the needs of the public library below.

Analysis of future impacts and affects of privatizing the roof of our library, which takes accountability of maintenance and ownership out of public hands is quite disconcerting, especially if poorly maintained private energy and water systems damage the library and its materials below.

Further, there is no sense of who would own the rights to the space above the library if its privatized making the future of this historic structure much less certain. Analysis of real impacts of intertwining public and private interests would have to be conducted, but would be problematic as there is far less transparency of the privatized space and its uses.

All of these issues I mention above, pivoting on this question of a privatized or public space on top of our of existing historic central public library, relate directly to the topics and impacts that the NEPA/106 is supposed to review.

But since the issue of who will own, what will be there, and how the space on the roof of our
library may be used has still not been dispensed with, as requested by the public, then the NEPA/106 review is way too premature and will result in a report not based on substantial evidence or fully evaluated findings.

**Conclusion**

The District Dynamos would like to ask NCPC to request DCPL work with the public and City officials to make a final decision about the ownership and use scheme anticipated for whatever structure may or may not go on the roof of DC’s central library before proceeding with any NEPA/106 review.

We look forward to your response.

Regards,

[Signature]

Chris Otten, Coordinator
DC Library Dynamos
1530 P Street, NW
202-387-8030
dclibrarydynamo@rushpost.com
Comments on MLK from our neighbor...

Jeff Bonvechio
202.442.6070

Hey Jeff –

Sid’s a good guy and the comments expressed are not unreasonable. I believe that the garage entry proposition is already off the table. Regardless, do I tell him to weigh in through any official public scoping channel? Is the First Congregational UCC a consulting party?

Thanks.

October is National Disability Employment Awareness Month. To learn what you can do to foster a more inclusive workforce, visit www.dol.gov/odep and www.dds.dc.gov.

Mr. Richard Reyes-Gavilan, Chief Librarian/Executive Director
MLK Library
9th and G. St., NW
Washington, DC 20001

Dear Rich,

We appreciated the opportunity to meet with you last month and get to know you, Meaghan, and Jean a bit better. We value you, our neighbor and partner, in strengthening the quality of life for all who visit us on G Street between 10th and 9th. We are also excited about the renovation of the Library and want to help during your time of transition in any way that we can.
As promised, we are following up our conversation with a summary of our concerns about the June 13, 2014 draft MLK Concept Design so that you can share it with both Mecanoo and Martinez + Johnson Architecture as well as Jeff Bonvecchio, Project Manager:

**MLK Garage entry** – On p. 17, Option 2 suggests accessing the MLK garage through the Church parking garage. This plan is not feasible since our organ chamber extends down into the garage beginning at the end of the ramp and cannot be relocated. Any further construction activity in this area would harm this delicate instrument.

**Bike Kiosk** – On p. 29, a bicycle kiosk shed is proposed in the pocket park abutting our building. While we are committed to a public purpose in this space, we feel that it is very important that it continue to be an open space without an additional permanent structure such as the proposed kiosk.

We would like to work with the Library on a treatment for this outdoor space that would create a clear view from 9th St. through the MLK Plaza and ending at the handsome gray wall and light box of the church. To do this would require cutting the yellow wall back to the fence that closes off the alley and perhaps placing a significant piece of sculpture related to Dr. King and his legacy facing east with the gray brick wall of the Church as the backdrop. This could tie the open space under the Library with the pocket park as one visually seamless space. Perhaps we could collaborate on a grant application for a permanent piece of artwork to tie these two spaces together as one grand public plaza.

**Opening the Alley** – On p. 28, there is proposal to open the alley connecting G St. to G Place. At the outset of our Church redevelopment, we went to considerable time and expense to close the alley that had become a haven for drug activity, loitering, sleeping and trash. The city concurred and the back end of the alley beyond the fence is now owned half by the Library, and half by Jamestown Properties and the Church. It has provided an excellent off-street loading area for our building and has cleared up a lot of haphazard onsite parking from both the Library and the Church that had previously been a problem for both institutions. We would oppose reopening the alley.

**Addition to top of MLK** - As we indicated in the meeting, we sought to be very sensitive to the context of our new building relative to our neighbors, particularly MLK Library. Thus, we cut away the top of the building so that MLK was more visible and adopted a minimalist design. It is our hope that any addition to the building will follow the expansion design Mies van der Rohe foresaw and continue the current floor pattern upward rather than departing significantly from his intention as the current proposed diagonal addition does.
As the design process proceeds, we hope you contact us to discuss any ideas relating to our mutual interests in advance of making those design ideas public. You can call Sid at the Church – 628-4317 or Meg at 202-546-4536 since she is serving as a public representative on the Advisory Panel.

Again, we are so pleased that the Library is our neighbor and look forward to joint undertakings in the future.

Sincerely yours,

Sidney D. Fowler, Senior Minister
Susie Hayward, Moderator
Meg Maguire, Site Development Chairperson

Rev. Dr. Sidney D. Fowler
First Congregational United Church of Christ
945 G Street NW
Washington, DC
(church) 202.628.4317, (mobile) 202.870.0316
(hm) 202.332.1185

Please like First UCC, DC, on Facebook!

Please consider the environment before printing this e-mail.
Hi Ms. Hirsch,

I wanted to write to express my enthusiastic support for the proposed Mecanoo-designed four-story addition to the MLK library. The addition and interior renovation will compliment the existing architecture and help bring the library into the 21st century.

Thank you,

David Garber

David Garber // Twitter // Facebook // Instagram // 202-374-5340
Fyi..Public comment received via NCPC website.

Jennifer Hirsch  
Federal Preservation Officer | Urban Design and Plan Review  
National Capital Planning Commission  
401 9th Street, N.W. | Suite 500  
Washington, D.C., 20004 | 202-482-7239  
jennifer.hirsch@ncpc.gov

Please consider the environment before printing this e-mail

-----Original Message-----
From: Peter Kou [mailto:Koupeter262@gmail.com]  
Sent: Wednesday, October 01, 2014 7:28 AM  
To: Hirsch, Jennifer  
Subject: MLK Library Comment

The Dulles Airport Terminal Building extension repeated the structural system of the original without deviating from the form of the Masterpiece.  
The MLK Library Building is the work of another Master Architect Mies’ original concept envisioned a taller building. So it is a "no brainier" to extend the building by adding more stories by repeating the envelope system.
Given recent changes in the DC Public Library System’s plan for renovation and expansion of the Central Library, one significant matter remains that requires significant consideration within the Environmental Assessment/Section 106 process.

That is the potential for the addition of unrelated mixed use commercial and/or residential space within the building site. In promotional materials, this concept has been rendered as an ‘add-on” structure on top of an expanded Mies building envelope, as a building distinguished by its separateness, in keeping with the general recommendations of the Secretary of Interior’s Guidelines concerning “modern” additions to historic buildings.

Generating revenues by leasing space. For many reasons, this is not a good idea, although it has been justified for financial reasons, although the city has already committed $200 million to the estimated total project cost of $250 million, and it is not unreasonable to consider that remaining balance of $50 million could be raised through private fundraising and sponsorship. For example, the recent $185 million San Diego Central Library project raised $60 million in private donations for construction and $15 million for an operating endowment.

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Mixing national and local cultural assets in the “Federal City.” DC is different from many other cities, even other global cities like New York City, in that it possesses a wide range of federal cultural assets, such as the Smithsonian Museums, the National Gallery of Art, the Kennedy Center, and the Library of Congress, which often supplant the presence of locally-controlled cultural assets in the public’s mind.

The development of a set of local cultural assets within Washington, DC such as a pre-eminent fine arts museum, Central Library, history museum, and performing arts facilities has been stunted in the face of the existence of federal cultural institutions, especially when compared to other major US cities (such as New York City, Los Angeles, Boston, Pittsburgh, and Philadelphia), and other world capitals.

The continued maturation of the local element of what is otherwise a “federal city”—last week being the 40th anniversary of the Home Rule Act—could be expressed and local identity strengthened through the development, delivery, and operation of a set of exemplary cultural assets, through the creation of an integrated public realm framework.

The Central Library is typically the most prominent local cultural asset in a community, along with a public auditorium.

Mixing unrelated commercial or residential uses in pre-eminent public buildings. An inventory of central libraries in major US cities as well as an examination of the European case studies in the recently published Contemporary Library Architecture: A Planning and Design Guide finds that no major city in the United States or in Europe mixes unrelated commercial or residential uses within pre-eminent municipally-controlled and operated civic assets such as the city hall, publicly-owned museums, or the central library.

However, central libraries have been developed in Vancouver, San Diego, Salt Lake City, and Rockville, Maryland which have other public educational or government uses present within the building footprint, but do not include unrelated “mixed use” (commercial or residential) space.

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3 Nonprofit museums not controlled by local municipalities in New York City (MOMA), Denver (Denver Art Museum and the Museum of Contemporary Art have separate small upscale projects), Dallas (the Museum Tower building is in the Arts District, but not part of a museum) and Washington, DC (Newseum Residences apartments) have developed residential condominiums or apartments as part of museum expansion or redevelopment projects. Public museums such as the Metropolitan Museum of New York City, the Los Angeles County Museum of Art, or the Brooklyn Museum of Art have not pursued similar projects.
4 The Vancouver library in British Columbia rents office space to a provincial government agency and has a small conference facility used by community organizations.
5 The San Diego Central Library has rented two floors to the local school district for a public charter high school serving Downtown.
6 The Salt Lake Library complex includes a library store, art gallery, two cafes, space rented to the local National Public Radio affiliate, and the Community Writing Center operated by the local community college system.
7 The Rockville library building has office space separately rented to the Montgomery County Government and a cultural facility called the Center for Visual Arts.
Note that mixed use facilities incorporating housing and/or retail uses, supporting neighborhood-community improvement initiatives and public goals, are not out of the ordinary or incongruent when delivered and operated at the sub-city or neighborhood scale\(^8\).

Furthermore, I have argued that the question of appropriateness is not mixing “for profit” and “non profit” uses as much as it is mixing unrelated and related uses.

Mixing related cultural-educational-media/informational uses within a central library building could be considered congruent by extending the capacity of the “building” to satisfy various public uses while mixing a library and housing or unrelated office space is incongruent with the mission of a city’s pre-eminent cultural facility.

For example, media uses (a community newspaper—local radio station—what about WPFW or WeAct Radio, public access cable television), publishing (book and magazine publishing), book and media sales such as bookstores or news-stands—the Quebec National Bibliothèque and Archives in Montreal has bookselling stalls on the backside of the library operated by independent booksellers—could logically be included within a “City of the Book\(^9\)” or expanded community cultural complex, regardless of whether or not the uses are delivered by for profit businesses or nonprofit organizations.

\(^8\) Perhaps the most prominent example is the public library building in the Portland neighborhood of Hollywood. The building has a library and café on the first floor, with two floors of social housing above. The Drumbrae public library in England includes a library, youth center, café, and day care facility. See “Work begins on Drumbrae’s library, youth centre, and cafe,” Guardian, January 18\(^{th}\), 2011.

\(^9\) The City of the Book cultural complex in Aix-en-Provence, France includes the city library, a training facility for librarians, the archives of Albert Camus, and dance, cinema, and music facilities, and an annual book festival.
The “Library Park” initiative in Medillin, Colombia as an element of neighborhood and residential social inclusion is a particularly interesting example of libraries as the augurs of community improvement projects incorporating cultural, park, and public space and service functions with libraries as the primary anchor. Other cities have developed cultural complexes, with the central library at the center, Salt Lake City being one example.

The 1990s renovation of the Wilson Building by T. Conrad Monts as an example of mixing local and non-local uses in a prominent public building. We should also remember in the 1990s when the city proposed to pay for the renovation of the Wilson Building, DC’s City Hall, by renting two-thirds of the building to the Federal Government. At the time the city was broke and contracted with a developer, out of desperation, to renovate the building “for free.” In this case, free was going to be paid for by the federal government lease and loss of use of the space for 20 years. Residents and advocates erupted, responding negatively, and after public opprobrium, the city backed down from this poorly considered agreement, and broke the contract, although at great expense to the public, because the developer had to be repaid.

It is not a good precedent for the consideration of similar mixing of unrelated uses within the Central Library, especially by the development of space—residential—whose use cannot be changed without significant expense and difficulty.

The role of public buildings, the public realm, civic identity, and civic life as an element of the Section 106/Environmental Assessment process. Normally, the Section 106/Environmental Assessment process is straightforward, and deals with potential positive and negative impacts of (federal) undertakings on historic buildings, sites, and structures—questions like demolition, impact on and maintenance of architectural character and integrity, special merit concerning changes, whether or not the changes are so significant that a landmark designation is rescinded (such as with Soldier Field in Chicago) etc.

This case is different because specific plans proffered with regard to the Martin Luther King Junior Central Library raise concerns about the role of pre-eminent public buildings within local civic and cultural life. The impact of these proposed changes are an appropriate question for consideration within the Environmental review process, even though they aren’t necessarily architectural questions.

1. The first question is whether or not adding unrelated non-civic or non-cultural space to the Central Library diminishes the historic character and qualities of the building. (That is a separate question from adding more building to the building in a manner distinctly different from the Mies footprint, which these comments do not address, although to my way of thinking it makes sense to just make the Mies building bigger, along the lines of the arguments expressed by Stephen Semes in Future of the Past: A Conservation Ethic for Architecture, Urbanism and Historic Preservation.)

2. The second question is to consider whether or not the function of the library in terms of its place in the public commons and the public sphere would be diminished by the addition of unrelated commercial or residential space in any way to the building’s footprint.

Arguably, along with City Hall and local court buildings, the Martin Luther King Junior Central Library is one of local Washington’s most prominent civic assets and the most prominent local cultural facility.

**Conclusion.** It is reasonable to assert that the role of the central library within our community is so important and fundamental to the development and expression of local identity and civic life, that mixing unrelated non-cultural uses within the building program is a significant diminishment of the Central Library as the city’s foremost local cultural asset.

**Recommendation.**

The disallowance of mixing unrelated commercial and/or residential uses as part of the renovation and expansion of the Martin Luther King Jr. Central Library should be one of the findings and recommendations of the Environmental assessment review process.

Note that expansion of the building for related cultural, educational, media, and informational uses is not considered to be incongruent in the context of a Section 106 review.

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To: Ms. Jennifer Hirsch  
National Capital Planning Commission  
401 9th St., NW - North Lobby, Suite 500  
Washington, DC 20004

From: Meg Maguire, Member of the Advisory Panel for the MLK Library

I am pleased to submit comments on the four alternatives for the renovation/addition and related issues of the MLK Library as part of the simultaneous NEPA and Section 106 reviews.

I. Architectural Program

It is difficult for the public to understand the four alternatives without seeing a formal written architectural program that spells out the functions of the building and explains why a fifth floor is needed. The Library staff is now preparing an interim architectural program and I urge that this document be posted on the NCPC web site as soon as possible.

For many years we heard that the MLK building was too large and that perhaps excess space would be given over to a public/private partnership. However, after extensive public meetings, it is clear that DC residents want their main library to be a community gathering center where they can learn, share, create and find assistance within a light and spacious environment. To achieve this vision, the Library staff and the architects have determined that a fifth floor is necessary. The logic behind this more expansive design needs to be understood broadly by members of the public and by public officials alike as people come together to press for adequate funding and an accelerated schedule for delivery of this project. The posted document will also allow the public to review and comment on the Library staff’s conclusions regarding the need for an enlarged facility, since this will require a commitment to support and maintain the extra space.

II. The Alternatives

One problem with judging the alternatives is that they are not all equal in size or function. While Alternatives B and C are roughly equivalent in size and function, Alternative D would serve an entirely different purpose – private development -- and should be judged against other alternatives that would serve the same purpose. Therefore, if there is to be a substantial profit-making addition considered, the NEPA and Section 106 process should be reinstituted specifically to look at design alternatives to accommodate such development that have yet to be conceived.
Alternative A: *Do nothing* - Everyone agrees that we must do something bold and visionary. Doing nothing is not a viable option.

Alternative B: *Rectilinear addition* – This concept is the best of the four presented because it maintains the simplicity of the original building and is the least intrusive visually from the street below. (However, there should be an Alternative E: Extend the Mies Design as proposed below that adds one floor as Mies suggested would be possible. See further description of this proposed alternative below.)

Alternative C: *Curvilinear addition* – There is no rationale for this amoeba-shaped hat atop a classical Mies building. His architecture is characterized by simple enclosures that house human activity in light-filled spaces. Alternative C introduces something quite foreign to Miesian design – a misfit that should be discarded from further consideration.

On the interior, my personal preference is to open up as much of the building to light as possible without compromising those elements of the landmarked Main Hall that are essential to maintain integrity of the first floor space. Those walls that are deemed not to have been part of the original design could then be dealt with to achieve this objective. The architectural team has presented some interesting ideas to open the building to light and transparency and I look forward to their development during the design process.

Alternative D: *5th Floor Curvilinear Event Space + 3 Story Addition* - This is not so much a space as an alien spaceship, out-of-scale and out-of-context, diminishing all around it – the Library, St. Patrick’s, the Mather Building, the new building opposite the Library, and the next door neighbor, First Congregational UCC (the Church), that took special care to honor its landmark neighbor by cutting away to reveal more of that building. The public would be bombarded by this overbearing structure from afar, up close and in the reflection in the new glass building across the street. Alternative D is highly controversial both because it assumes a massive private addition and because it is so out of place and disrespectful of Mies’ simplicity. *In the interest of moving forward on the important business of reaching consensus, this alternative needs to be removed from any further consideration.*

Alternative E: *Miesian Addition of One Floor* – Another alternative should be added to the four now under consideration – a Miesian Addition. While Mies may not have left drawings for an addition, he did indicate that the building could be added to in the future and that the structure could support such an addition. The design is self-evident. The fifth floor would simply be a repetition of the fourth floor, which is a repetition of the third and second. Since some members of the design team of the original building are still alive, it might be possible to interview them and record their discussions during design about the addition. This oral history and recollection could help to provide further documentation of Mies’ intention.

As part of its work for the Urban Land Institute, the Freelon Group developed an option that shows this simple and handsome solution:
The Miesian addition would be contextually compatible with other structures on the street. Because the entire building will get new glass and be repainted, this simple extension of what is there now would blend in seamlessly. Because it would be the top floor and not be required to bear the weight of another floor above it, a glass ceiling would be possible, letting a great deal of light into the entire building and making possible a lush indoor garden to illuminate the entire top floor year-round, as opposed to the exterior spaces shown in Alternatives A-D whose use would be very limited in rain, snow, hot and cold weather. The middle portion of the fourth floor (and possibly the third floor) could be opened as well to create a light-filled atrium.

The public needs to know that there is another option to find space for the future needs of the Library and have an opportunity to comment on this possibility.

III. The Exterior Yellow Brick Wall

Removal of much of the yellow brick wall surrounding the Library could work wonders both for the neighboring properties and for bringing light into the Library. For example, removal of a small portion of the wall on the western side could open the Church’s pocket park back to the north/south brick wall/planter to become the termination of the sight line extending from 9th to the gray brick on the side of the Church. This space would be ideal for a stunning sculpture of, or related to, Dr. Martin Luther King Jr. In an email to Richard Reyes-Gavilan in mid-October, 2014, the Church expressed interest in collaborating with the Library to find funding from private foundations or other charitable sources for such a sculpture.

The Church has also expressed its opposition to filling the pocket park with a bike kiosk that would adjoin or block the view of the Church, stating instead that there are better uses for this space as part of a visionary public space that joins the pocket park with the Library loggia. But this would be possible only if at least a section of the yellow wall were removed. In addition, the Church went to considerable effort and expense to close the alley and has been pleased that it is now used for loading rather than for extensive loitering, trash and drugs. Removal of the yellow brick wall dividing the loading area from MLK would require that another barrier be constructed such as an attractive iron fence, but this could be done to offer greater transparency without sacrificing security. Any discussion of alterations to the alley should include both the Church and Jamestown, owner of the office building. Any changes must meet the needs of all parties.

Thank you for the opportunity to comment on this exciting project.
Jennifer Hirsch  
National Capital Planning Commission  
401 9th Street, NW Suite 500  
Washington, DC 20004  
October 31, 2014

Dear Ms. Hirsch:

MLK Library Friends are volunteers who support the mission of the public library and the activities of the Martin Luther King Jr. Memorial Library through advocacy, programming and fundraising. We have closely observed and participated in the public consultation process for the redesign and renovation of the MLK Library. We look forward to further involvement and welcome this opportunity to give preliminary comments to the National Capital Planning Commission regarding Historic Preservation and Environmental Impact on MLK Library.

Across the city we have found general issues of interest and concern are: honoring the legacy of Dr. King; ensuring the library building and air space remain public; bringing light and vibrancy to the building; and ensuring the highest standards possible for environmental sustainability. We touch on them below in as requested in your letter to consulting parties. First however, we would like to provide background to the process that has finally brought us to this point.

Central public libraries are arguably the most important civic projects cities can undertake. Open to all, their charge is to provide access to information, as well as space for civic, educational and cultural activities. As might be predicted, such an important project has been buffeted by changing political headwinds in the District beginning as far back as fifteen years with recommendations for renovation from a pro-bono study requested by the Board of Library Trustees, to efforts by mayors to sell the library building, to attempts to privatize the airspace by deputy mayors for economic development, to efforts to downsize the library by the Chief Librarian, and now to a creative renovation combined with an expansion of public space currently favored by the Library staff.

The MLK Library Friends supports this latest concept – to creatively renovate the central library and expand public space. To the extent that the process continues to be frustrating, we look forward to NCPC bringing objectivity, consistency, and an understanding of comprehensive, long range planning to what has been a long and arduous process.

Sincerely yours,

[Signature]

Robin Diener, President, MLK Library Friends
MLK Central Public Library and Partnerships

One thing that has become clear to the MLK Library Friends—who have closely observed and participated in all aspects of the public consultation process—is that the public-at-large does not support privatization of its central public library building or airspace.

Furthermore, no major OECD (Organisation for Economic Co-operation and Development) city, and, certainly, no national capital city has taken such an action. Three floors of unrelated mixed use dropped atop what has the potential to be Washington’s most prominent civic and cultural asset, and including unrelated, private mixed use on the building within its footprint is a significant diminishment of a public resource as well as an insult to the library’s namesake.

In view of concerns about underfunding the library in the past, it is reasonable to consider cost sharing with other city agencies such as the DC Archives or Department of Employment Services, or potential revenue streams such as a conference center. Public partnerships could well be appropriate and advisable, but have not been explored. It remains unclear whom the building will serve or how it will meet their needs. Attached is the MLK Friends’ resolution in support of full public funding and asking for an analysis of potential public partnership opportunities.

Need for a Building Program

It is difficult, if not impossible, to logically comment on the alternative schemes for the MLK Library thus far since no formal building program has yet been presented to, or approved by, the Board of Library Trustees. Neither has a formal program been shared with the public or with members of the Advisory Panel, such as the MLK Library Friends.

Some of the designs presented at the October 7, 2014 NCPC meeting had not been previously shown to the public—this includes the three most recent meetings in September which were specifically convened by the Advisory Panel at request of DCPL to gather public input. At the NCPC meeting for the first time, DCPL presented a fifth floor option as necessary to fulfill the central library’s space requirements. For many years, DCPL officials asserted that the central library is too big. The public at large and library advocates have always disagreed with that assessment. The advocates’ view is that budgetary constraints—for a time bordering on demolition by neglect—kept MLK from being utilized to its full potential.

While DCPL’s decision to add space comes as a surprise, it is a welcome one. A smaller central library never made sense. Advocates have long cited increasing library usage throughout DC, the US and around the world, as well as the growing number of nontraditional library uses that the public favors: gathering spaces, gallery and exhibition space, collaborative spaces for co-creating, high-quality auditoriums for a range of performance, retail spaces such as a Friends of the Library store (which MLK used to have), restaurants and coffee shops, schools, theatre companies, music and dance academies, rehearsal space, daycare, workplace development centers, research centers,
centers for writers and spaces dedicated to seniors. Anyone who has seen the Ballou High School marching band at practice in MLK’s basement realizes the building’s unlimited potential to serve and supplement educational needs.

Now that we have arrived at a moment of political will for a renovation and have begun looking at the building more creatively, DCPL has found that more space, not less, is required, exactly as advocates have asserted. DCPL has said it can support whatever uses are chosen for the library, including through partnerships. The MLK Library Friends is supportive of this conclusion and believes that in fact other public agency missions, consistent with the library’s purpose, should also be explored.

**Addition and the Need for a Fifth Alternative**

From an historic preservation viewpoint, the most rational alternative for an addition—an extension of the building exactly as it exists—was not presented. Such an extension was envisioned by the architect and the building was structurally engineered to support it (two-three floors). Moreover, a contemporary rendering by the Freelon Group was presented to the Library Trustees by the Urban Land Institute in 2012. Therefore, we believe a fifth alternative should be added. Alternative Five would allow an expansion of one to three floors, for library and other related public purposes found to be appropriate.

![Two additional floors (total six above ground) as envisioned by Mies
Rendering by The Freelon Group, 2012](image)

The library has finally come to the realization that what we already have is extremely valuable—as an iconic architectural structure which could for that reason alone be a magnet for tourists. The Moshe Safdie-designed Salt Lake City central library is the largest tourist attraction in Utah.

**Openness, Transparency and Light**

The 2000 Board of Library Trustees-commissioned study, led by Kent Cooper of the AIA Urban Design Committee, identified the lack of light in the interior of the building as a major deterrent to use and enjoyment of the MLK Library by the public. In addition, the black tinted glass skin presents a psychological barrier to use. Passersby and library users, too, often describe the building as looking somber, ominous and depressing from the outside.
We therefore welcome all the design elements proposed that increase natural light into the building. This includes redesign of the building’s “cores” to be glass enclosed, as well as the creation of exterior light wells in the pavement around the MLK Library building.

![Glass enclosed staircase and outdoor light wells](image)

The conversion of the loading dock to interior space is another welcome concept. In addition to reclaiming needed space for public use, it will provide visibility through the center of the building from G Street to Tenth Place, greatly adding light and openness on the entry level, which is surrounded by a loggia that reduces light. Plans also show reader spaces at the perimeters of the building, a common-sense practice and an example followed by libraries world-wide, along the windows on each floor.

**Replacing Brick with Glass**

The MLK Library Friends also supports the removal of all brick walls—interior and exterior—and replacement with glass where necessary. Greatly increasing the transparency of the building will not only increase light, but it will also help draw people into the library, as well as share interior liveliness with the streetscape. Some of the brick elements have protected status as part of the historic landmark status of the building, but openness is a hallmark of the Modern architecture era and of Mies’ designs in particular. Many significant Mies buildings designed for cultural and educational purposes—including the Neue Nationalgalerie in Berlin and Crown Hall at the Illinois Institute of Technology—have walls made entirely of glass.
The MLK Library historical records show that brick was introduced only after marble specified by Mies was eliminated due to budget constraints. While we understand that buildings are landmarked as built, it is critically important to use this once in a lifetime opportunity for renovation of the MLK Library to make reasonable adaptations that will increase the appreciation and use of this public building and bolster its continued funding. Marble, had it been used, would be as lacking in transparency as brick, but worth saving for its beauty and association with grandeur. The brick, however, feels cheap and paltry in this setting, as indeed it is a substitute mandated by budget cuts. We endorse the replacement of brick with glass throughout.

**Atrium and Reading Room**

Many longtime library advocates were inspired by the multi-story atrium proposed by Kent Cooper in the 2000 study.
The revelation of the Kent Cooper plan was finding the large clear-span area in the center of the building that could be used to create a grand Main Reading Room under the skylight. A great library needs a great reading room, where anyone can sit in an inspirational setting, to read, study, and dream, but the renovation plans currently do not show one.

Using an atrium to create a Main Reading Room on the second floor, or higher, while still keeping the Great Hall intact under its landmark status, would add an essential element that was lacking. We highly recommend some version of the atrium design—whether multi-story or a single story to bring more natural light to library spaces, especially the center of the building—being incorporated into the renovation plans.

**Roof Use**

During the selection process, the firm of Patkau/Ayers Saint Gross submitted the concept of an interior courtyard on an atrium roof level as the design for an addition, be it one, two or three floors. It would be symmetrical and straightforward like the rest of the building but with some of the interior volume carved out. An interior courtyard would address concerns about trees or shrubbery being seen from the ground that some have expressed, although the MLK Library Friends does not object to trees being visible. We would support live plants throughout an outdoor interior courtyard on the atrium roof level and use of green space by the public as a park with an outdoor reading room and cafes.

![Image of a courtyard](image)

*Patkau/Ayers Saint Gross*

The ultimate design of roof areas should contribute to the city’s goals for sustainability. Time and again library users and residents have said they want to see maximum environmental forward thinking in their public buildings. MLK Library Friends is interested in such things as green roofs, stormwater management, teaching gardens, butterfly gardens, planting for native birds and pollinators, reduction of the heat island effect, and possible energy generation through solar and wind capture. We are also interested in reducing bird deaths from crashing into reflective glass and want to ensure MLK Library is renovated with “birdproof” glass.
Hi Jennifer,

I'm a citizen of DC and I'm writing to let you know I support the current plan for renovating DC's MLK Library.

I support the current design because I think DC will benefit from more iconic, contemporary architecture that complements our beautiful city. As someone who works with libraries around the world to become true centers of community activity, I also support this design because I think it positions the library to better serve as a hub of community life for DC residents.

Thank you for considering my comments.

Best Regards,

Matt Vanderwerff
Comment Form

All comments must be post marked by October 31, 2014

Mail to: National Capital Planning Commission
Attn: Jennifer Hirsch
Suite 500 North
401 9th Street NW
Washington, D.C. 20004

Name: Sherry Gillespie
Address: 925 H St NW

Phone Number: Email: sgillespie9@gmail.com

I strongly believe this project needs to result in a completely public space. Any additions and modifications need to be inviting for the community. They need to foster learning and communicate. The addition of cafes and patio space as well as a children's area would be most welcome.

I do not believe that this is compatible with residences or offices which would cut the public access.
Consulting Party Meeting #2 (November 19, 2014)
Meeting Minutes

FROM: EHT Traceries
SUBJECT: MLK Jr. Library Renovation
Section 106 Consulting Party Meeting #2
DATE: November 19, 2014

The following minutes represent comments received during the second Section 106 consulting party meeting for the MLK Jr. Library Renovation.

Attendees

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<thead>
<tr>
<th>DC Public Library (DCPL)</th>
<th>Richard Reyes-Gavilan</th>
<th>Martha Sacoccio</th>
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<td></td>
<td>Jeff Bonevechio</td>
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<td>Chris Wright</td>
<td>Archie Williams</td>
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<td>National Capital Planning Commission (NCPC)</td>
<td>Jennifer Hirsch</td>
<td>Vivian Lee</td>
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<td>DC State Historic Preservation Office (SHPO)</td>
<td>Anne Brockett</td>
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<td>Mecanoo Architects (MA)</td>
<td>Francine Houben</td>
<td>Hans Andersson</td>
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<td>Sofia Pereira</td>
<td>Bianca Breumelhof</td>
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<td>Luuk van Wijlick</td>
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<td>Martinez + Johnson (MJ)</td>
<td>Tom Johnson</td>
<td>Rauzia Ally</td>
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<td>Jair Lynch Development Partners</td>
<td>Jair Lynch</td>
<td>Josh Firebaugh</td>
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<td>EHT Traceries (EHT)</td>
<td>Emily Eig</td>
<td>Kimberly DeMuro</td>
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<td>Bill Marzella</td>
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<td>Stantec</td>
<td>Liz Estes</td>
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<td>Commission of Fine Arts (CFA)</td>
<td>Thomas Luebke</td>
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<td>Committee of 100 on the Federal City</td>
<td>Stuart Gosswein</td>
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<td>DC for Reasonable Development (DC4RD)</td>
<td>Chris Otten</td>
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<td>First Congregational United Church of Christ (FC UCC)</td>
<td>Meg Maguire</td>
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<td>Smithsonian National Portrait Gallery</td>
<td>Dina Wilkins</td>
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<td>Office of Jack Evans, Ward 2 Council Member</td>
<td>Windy Abdul-Rahim</td>
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<td>ANC 2C01</td>
<td>John Tinpe</td>
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<td>Penn Quarter Neighborhood Association (PQ)</td>
<td>Jo-Ann Neuhaus</td>
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<td>DCPL Federation of Friends</td>
<td>Susan Haight</td>
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<td>DC Preservation League</td>
<td>Rebecca Miller</td>
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<td>MLK Library Friends</td>
<td>Elizabeth Elliott</td>
<td>Richard Layman</td>
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<td>Robin Diener</td>
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Presentation

1. DCPL introduced the project and discussed recent updates, including release of library program.
2. NCPC reviewed progress with NEPA and Section 106 processes and reviewed comments received during the NEPA scoping period.
3. EHT reviewed historic resources within the Area of Potential Effects (APE), with focus on the significance of MLK and the preservation zones in the Design Guidelines.
4. MA presented design research and background.
5. MA presented six design (including one no-action) alternatives.
6. EHT reviewed APE and criteria of adverse effect, including examples and Secretary of the Interior (SOI) Standards.
7. EHT presented proposed areas of potential direct and indirect adverse effects.
8. EHT invited questions and discussion.

Discussion

1. PQ raised question of design features that were intended by Mies but never implemented. Asked if those could be identified and if their incorporation would be an adverse effect.
   a. EHT discussed these and suggested they would likely constitute an adverse effect, as they would create a false sense of historical development, which are not recommended by the SOI Standards.
2. MLK Friends (Richard Layman) suggested that, if a mixed use is proposed, the building’s diminished use as a civic and cultural institution should be included in the discussion of adverse effects (i.e., an unrelated or private use should be evaluated as a potential adverse effect).
   a. General discussion of library’s role in history of city and its evolution, how this process is reflective of that change.
   b. General discussion of related vs. unrelated programs/public vs. private uses.
   c. MLK Friends clarified that this would only be a concern for Alternative C (four-story addition), and that compatible uses (cultural, public, non-profit) uses should be explored.
3. NCPC reiterated that program analysis has indicated need for fifth-floor addition. DCPL has not yet indicated the use for the addition proposed under Alternative C.
   a. NCPC indicated that a change in use may meet the criteria of adverse effect. NCPC also indicated a preferred alternative had not yet been identified, but as the assessment of effects report is prepared, a change in use or introduction of new use would be evaluated for potential to cause adverse effects.
4. DC Preservation League asked if other street-level views had been developed, particularly down Ninth Street from Mt. Vernon Square.
   a. EHT clarified that MLK (currently) could be seen from Ninth and K Streets, but not from Mt Vernon Square. (Note: Project Team subsequently restudied views along Ninth Street. Views of project from Ninth and K Streets are minimal, while views from Ninth and Eye Streets are the northernmost point at which an addition would be clearly visible.)
   b. Requested that views be developed to inform assessment of effects from APE.
   c. General discussion of views throughout APE, visibility of various additions.
   d. FC UCC requested that views be analyzed in other ways, such as reflectivity from surrounding buildings.
5. David Edwards asked for clarification regarding “false sense of historical development.”
   a. Suggested design for public art in the form of a reconstruction of the Edmund Pettus Bridge on the library plaza.
6. Mr. Edwards also stressed general need to improve the interpretive and commemorative aspect of the renovation.
   a. Various parties agreed with Mr. Edwards’s assessment, but suggested that this discussion may not be relevant to discussion of adverse effects.
   b. The commemoration aspect was a recurring topic throughout the discussion.
   c. Mr. Edwards reiterated these points later in the discussion
7. Committee of 100 suggested that activity on roof (people, trees, etc.) has the potential for adverse effects on views, particularly from surrounding buildings.
8. MLK Friends (Robin Diener) requested additional clarification on timeline and process, expressed frustration with cyclical nature of public outreach.
   a. Requested summary of comments received during public scoping
   b. Requested financial analysis from DCPL.
   c. EHT responded that the next step in the Section 106 process is to present finding of adverse effects and to begin to formulate potential resolution strategies.
   d. NCPC indicated that a NEPA scoping report would be posted to ncpc.gov (following the Section 106 meeting, the NEPA scoping report was posted and consulting parties were notified via email on November 20, 2014 of its availability.)
9. Penn Quarter again raised discussion of replication of lost or unimplemented historic and architectural features, using Willard Hotel as an example.
   a. Questioned the application of standards between various preservation projects
   b. EHT, NCPC, others replied that application of standards is somewhat subjective, but ultimate determination is made in consultation with SHPO.
10. CFA provided general comments, including:
    a. MLK Library deviates from the canon of Mies’s work; does not quite fit either of his two typical building types.
    b. Stated that evaluation must be made on existing, contributing features, not conjectural ones
    c. Discussed general challenges of preservation modern architecture, including envelope
    d. Stated that Alternative B.4 (fifth-floor extrusion) does not meet SOI standards 3, 9, and 10; read those standards
    e. Discussed general concern about scale and massing of Alternative C
11. Docomomo offered general comments, including:
    a. Rehabilitation of buildings offers a tremendous opportunity to preserve a significant Modernist landmark.
    b. Suggested that an HSR should be created to inform the design approach
    c. Stated that Alternative C was not an appropriately scaled addition
    d. Questioned if the greater urban context had been studied
12. DC4RD stated that privatized space on top of public space was incompatible, and suggested that it would result in a greater impact to the maintenance and environmental demands.
    a. Requested that Alternative C be removed from consideration.
    b. Seconded request for financial analysis
13. FC UCC stated that significant advancement had been made from 1 ½ years ago, including release of library program
14. MLK Friends (Elizabeth Elliott) offered general comments, including:
    a. General familiarity with MLK Library, evolution over time, and Mies’s work
    b. Discussed structural issues, namely accelerating collapse of vaults along south granite plaza
    c. Discussed focus on approach and corner of building, using Kennedy Center staircase addition as an example
    d. Discussed general issues with sustainability and Modernist architecture
15. MLK Friends (Richard Layman) discussed need to address adverse effects within greater cultural landscape and context of civic uses in DC, may allow for differing interpretation of SOI Standards.

16. Committee of 100 suggested that the height restrictions in DC have created unique precedents for development, which creates many situations in which historic properties are incorporated into new developments.

Conclusion and Next Steps

1. NCPC presented the information on the final slide, with instructions for accessing documents and submitting additional comments. NCPC indicated comments would be accepted until Dec. 3, 2014.

Additional Comments

1. Additional comments received (included as attachments):
   a. ANC 2C01, December 1, 2014
   b. SHPO, December 3, 2014

Minutes prepared by Bill Marzella, EHT Traceries, December 8, 2014
I am forwarding a public comment we received since the Section 106 meeting.

Jennifer Hirsch
Federal Preservation Officer | Urban Design and Plan Review
National Capital Planning Commission
401 9th Street, N.W. | Suite 500
Washington, D.C., 20004 | 202-482-7239
jennifer.hirsch@ncpc.gov

Please consider the environment before printing this e-mail

From: Tinpe, John (ANC 2C01) [mailto:2C01.ANC@dc.gov]
Sent: Monday, December 01, 2014 3:30 PM
To: Hirsch, Jennifer
Subject: RE: MLK Library Renovation Project - Public Comment

Dear Jennifer,

Thank you for the meeting and compiled report.
From what I see from the report, there has been a detailed study on the design. There has also been specifically mentioned Adult and children's spaces.
But most importantly, this library must be dedicated to the memory of the late Rev. Martin Luther King Jr.
There must be a permanent exhibition at the entrance, or main hall, dedicated to the work, life and achievements of the late Dr. King. There should be photographs and displays in glass cases, books and archives, relating to the Non-Aggressive Civil Disobedience Movement, the Civil Rights March, the signing of the Voter Rights Act with President Johnson. The Anti-War Peace Movement against Vietnam War. The Federal agencies wire tapping all of Dr. King's activities and attempts to discredit him as a Communist. Finally, the assassination of Dr. King and the resulting riots all over the nation including Washington, DC.
From what I hear from the meeting, there is a fear from the community that among all the discussion about design, commerce, aesthetics and practical purposes, the memory of the martyr maybe overshadowed and history white washed.
Please re-dedicate to the memory and life of Dr. King. Please re-emphasize the importance by dedicating principle space in the principle area to the man and his work. The man who gave his life to Civil Rights so important, not only to African Americans, but all minorities including Latinos, Asian Americans and members of the GLBT communities.

Thank you for your attention.
Best wishes,
John Tinpe
ANC2C01

From: Hirsch, Jennifer [jennifer.hirsch@ncpc.gov]
Sent: Thursday, November 20, 2014 6:29 PM
To: Hirsch, Jennifer
Subject: MLK Library Renovation Project - Materials available on NCPC website

Dear Consulting Parties,

The presentation that was provided during yesterday’s Section 106 meeting on the MLK Library Renovation Project has been posted to NCPC’s website. Please provide any comments regarding effects on historic properties by December 3, 2014.

http://www.ncpc.gov/ncpc/Main(T2)/PublicParticipation(Tr2)/Public%20Participation(Tr3)/PublicCommentOpportunities.html

Along with the Section 106 presentation, the NEPA scoping report has been posted to NCPC’s website and can be found on this link:

http://www.ncpc.gov/project/mlklibrary/

If you have any questions on these materials, please let me know.
Thank you,
Jennifer

Jennifer Hirsch
Federal Preservation Officer | Urban Design and Plan Review
National Capital Planning Commission
401 9th Street, N.W. | Suite 500
Washington, D.C., 20004 | 202-482-7239
jennifer.hirsch@ncpc.gov

Please consider the environment before printing this e-mail
December 3, 2014

Ms. Jennifer Hirsch
National Capital Planning Commission
401 9th Street NW, Suite 500
Washington, DC 20004

Dear Ms. Hirsch:

The District of Columbia State Historic Preservation Office (SHPO) has reviewed the materials distributed at the Section 106 Consulting Party Meeting held on November 19, 2014 as well as the National Environmental Policy Act (NEPA) Public Scoping Report dated November 2014, for the renovation of the Martin Luther King Jr Memorial Library. The Library, including the first floor public spaces, was designated a D.C. Landmark in 2007 and was subsequently listed in the National Register of Historic Places.

As a local landmark, the project is subject to review by the Historic Preservation Review Board (HPRB), the official body of advisors appointed by the Mayor to guide the government and public on preservation matters in the District of Columbia. In addition, the National Capital Planning Commission has initiated a review under Section 106 of the National Preservation Act. Thus for the purposes of HPRB review, Section 106, and the NEPA planning process, the SHPO offers the following comments.

The SHPO believes that all alternatives except A (No Action) would have an adverse effect on the building due to loss of historic fabric, alterations to public spaces and circulation patterns, and construction of a rooftop addition. Of the remaining alternatives, the SHPO does not support the exterior work proposed in Alternative B4 or C, which deviate significantly from the Secretary of the Interior’s Standards for Rehabilitation. On the other hand, Alternatives B1, B2, or B3 - although they may have adverse effects - appear to meet the needs of the Library without diminishing the building’s integrity to a degree that would compromise its historic status.

As general principles for the design process, the SHPO recommends the following:

1. Rather than thinking of this project as an opportunity for transformative design, the team should focus on ways to meet the Secretary of the Interior’s Standards while accomplishing the Library’s goals. Bear in mind that, much like public libraries, the National Historic Preservation Act and the regulations and standards that developed after it were also established for the benefit of the public.

2. The MLK Library Design Guidelines were created specifically to direct DCPL in making decisions related to adapting MLK Library for modern use. The Guidelines were formally adopted by the Historic Preservation Review Board and will therefore guide the Board in making decisions about the treatment of the building and its components. Any proposed plans for the building should expressly relate to the preservation zones of the building, which delineate the hierarchy of significant spaces as established and agreed to by DCPL and HPRB.

3. The Design Guidelines are a thorough and comprehensive document and should be used to avoid and minimize adverse effects relative to the established preservation zones. In addition to
addressing floorplans, open space, and circulation issues, the Guidelines should direct decisions about individual historic components, including such items as built-in shelving, information and circulation desks, furniture, phone booths, water fountains, signage, dumbwaiters, etc., for which very specific guidance has been provided.

We ask that consideration be given to the following specific aspects of the design for the MLK Library building:

**Exterior**

- DCPL should make a determination as soon as possible on whether there will be other uses in the building, a factor which is apparently driving the necessity of adding more than one floor.

- The size of any addition should be determined by Library's *minimum* space requirements, i.e. as small and unobtrusive as possible.

- Either a curved or rectilinear addition may meet the Standards as both are reversible and clearly distinguishable from original construction. However, a rectilinear form would be more in keeping with the Design Guidelines.

- More information is needed on plans for the building envelope, including the need for replacements, proposed replacement materials, benefits of replacement vs. rehabilitation, etc.

- More information is needed on proposed new exterior doors, which ideally should be on the alley side and/or rear, not the façade.

- If avoidance is not possible, exterior light wells should be located where there is the most need for basement light and should be designed to minimize adverse effects.

- More information is needed on the extent of removal/alterations to the site walls.

- Brick removal on the façade should not occur, although replacing metal panels in the side walls of the front projections with glass, may be a good opportunity to increase natural light.

- Consideration should be given to bike storage at the rear with a more engaging use at the west side alley.

**Interior**

- Consider comprehensive wayfinding tools and/or a signage program rather than wholesale removal of historic materials to resolve directional issues within the library.

- If avoidance is not possible, limited insertion of glass for visibility/vertical connectivity may be appropriate, rather than wholesale removal of historic materials.

- The MLK mural on the north wall of the lobby should remain. Consider avoidance or minimization of the removal of the wall beneath it for pivoting doors (i.e. leave all or some brick bays under mural intact).
- If avoidance is not possible, consider minimizing the loss of brick walls around the central core on upper floors though the use of partial walls, half walls, piers, lintels, etc.

- Avoid dividing up the landmarked first floor reading rooms unless the proposal is for use only, not a physical division of the space.

- Avoid or minimize the loss of fabric in the vestibule (i.e. enter stairs through center bay and leave outer bays of brick).

- Carefully study the informal performance space the in the loading dock area so that a two-level design does not preclude uses or accessibility.

As the project moves forward, the SHPO looks forward to a continued public review process that identifies ways to avoid, minimize, and mitigate adverse effects. If you should have any questions, please do not hesitate to contact Anne Brockett at anne.brockett@dc.gov or 202-442-8842. Thank you for providing this office the opportunity to comment.

Sincerely,

David Maloney
State Historic Preservation Officer
Consulting Party Meeting #3 (July 14, 2015)
Meeting Minutes

FROM: EHT Traceries
SUBJECT: MLK Jr. Library Renovation
Section 106 Consulting Party Meeting #3
DATE: July 14, 2015

The following minutes represent comments received during the third Section 106 consulting party meeting for the MLK Jr. Library Renovation.

Attendees*

<table>
<thead>
<tr>
<th>DC Public Library (DCPL)</th>
<th>Richard Reyes-Gavilan</th>
<th>Jonathan Butler</th>
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<tbody>
<tr>
<td></td>
<td>Joi Mecks</td>
<td>Martha Saccocio</td>
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<td>Manya Shorr</td>
<td>George Williams</td>
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<td>National Capital Planning Commission (NCPC)</td>
<td>Jennifer Hirsch</td>
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<td>DC State Historic Preservation Office (SHPO)</td>
<td>Anne Brockett</td>
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<tr>
<td>Mecanoo Architects (MA)</td>
<td>Francine Houben</td>
<td>Sofia Pereira</td>
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<tr>
<td>Martinez + Johnson (MJ)</td>
<td>Georgina Sperber</td>
<td>Tom Johnson</td>
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<td>Jair Lynch Development Partners</td>
<td>Joshua Firebaugh</td>
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<td>EHT Traceries (EHT)</td>
<td>Emily Eig</td>
<td>Kimberly DeMuro</td>
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<td></td>
<td>Bill Marzella</td>
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<td>Stantec</td>
<td>Liz Estes</td>
<td>Laura Cooper</td>
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<td>Commission of Fine Arts (CFA)</td>
<td>Thomas Luebke</td>
<td>F.J. Lindstrom</td>
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<td>ANC 2C01</td>
<td>John Tinpe</td>
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<tr>
<td>Penn Quarter Neighborhood Association (PQ)</td>
<td>Jo-Ann Neuhaus</td>
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<td>DCPL Federation of Friends</td>
<td>Susan Haight</td>
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<tr>
<td>MLK Library Friends</td>
<td>Robin Diener</td>
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<td>Brookfield Properties</td>
<td>Anne Clinton</td>
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<tr>
<td>Downtown BID</td>
<td>Gerry Widdicombe</td>
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<td>Glover Park Group</td>
<td>Lisa Miller</td>
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<td>Turner Construction Company</td>
<td>Jeff Burnham</td>
<td>Tom Sawyer</td>
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<td>Gilbane Building Company</td>
<td>Clare Archer</td>
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<tr>
<td>The InTowner</td>
<td>Anthony Harvey</td>
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<tr>
<td>Additional</td>
<td>David Edwards</td>
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* This list includes attendees who signed the sign-in sheet or were otherwise noted
Presentation

1. NCPC introduced the project and provided a brief description of the Section 106 process.
2. DCPL discussed the program and vision for MLK Library, including the commemoration of Dr. King.
3. NCPC reviewed the meeting agenda, presented the process flowchart, and discussed comments received at the November 2014 Consulting Party Meeting.
4. EHT presented the Historic Structure Report and the updated NEPA Alternatives to be analyzed in the Environmental Assessment.
5. MJ presented the existing building and glazing conditions
6. MA presented the preferred alternative design
7. EHT reviewed the Area of Potential Effect (APE) and criteria of adverse effect, including examples of adverse effects
8. EHT presented the character-defining features of MLK that would be potentially adversely affected from the proposed undertaking.
9. EHT invited questions and discussion.

Discussion

1. David Edwards is concerned with the physical presence and representation of Martin Luther King, Jr. within the renovated library. He feels that more emphasis needs to be put on artwork than programming.
   a. He also reintroduced his idea of incorporating the Edmund Pettus Bridge and/or the Ebenezer Baptist Church podium into the design of the building.
   b. DCPL (Richard Reyes-Gavilan) responded that commemoration is of concern for DCPL. DCPL hopes to bring Dr. King to life through programming in addition to a possible exhibit, the details of which were still under development.
   c. Mr. Edwards asked DCPL to explain programming.
   d. DCPL responded that DCPL would like to employ a Dr. King scholar who would utilize existing collections to make Dr. King's and Civil Rights history more accessible to the public. However, all the details of programming have not been developed. Commented that currently DCPL was concerned with working through the regulatory process, but would work on program planning in the future.
2. SHPO (Anne Brockett) agreed with Mr. Edwards that commemoration of Dr. King should be incorporated into the plan. Indicated that perhaps it could take the form of a mitigation measure if there are any adverse effects to the building, and that these commemorative elements should be a part of the current review.
   a. Asked if the Advisory Council of Historic Preservation (ACHP) had been contacted.
   b. NCPC stated that ACHP had not yet been contacted, that both ACHP and SHPO would be notified in writing when a Determination of Effect had been formally completed.
   c. NCPC agreed that commemoration could be a topic for discussion regarding mitigation for any adverse effects.
   d. SHPO asked what the pivoting door material is.
   e. MA (Francine Houben) stated it was undecided.
   f. SHPO asked if the café would be connected to exterior seating.
   g. MA responded yes.
   h. SHPO asked for clarification that there would be new doors on the building’s exterior for this purpose and if a new egress was necessary for the proposed stairwell.
      i. EHT (Bill Marzella) stated that there were existing doorways in some of those locations.
3. MLK Friends (Robin Diener) stated that the legacy of Dr. King was not the original focus of the design, but that it was now. Recommended that a committee, sub-committee or some other sort of advisory group be appointed for commemorative designs.
a. Ms. Diener mentioned earlier plans from the second consulting party meeting, asking about the design alternative with light wells, stated she previously believed the commemorative bridge could have been incorporated but based on the preferred alternative design presented today that it could not, and asked about marble being incorporated into the design.

b. Ms. Diener also asked how the preferred alternative design was reached. Upon review of the design alternative B.3, asked for clarification of the presence of light wells.

c. EHT Traceries responded that two smaller courtyards were incorporated into B.3, so the planned large auditorium could be maintained.

d. DCPL stated that the rationale for the chosen preferred alternative was threefold: CFA had previously mentioned that the addition should be distinct and not appear to be an original portion of the building; that it meet the library's needs; and that the design will be approvable for the historic structure.

4. Mr. Edwards continued the discussion of his opposition of programming being used as a substitute for commemorative pieces of art.

5. The InTowner (Anthony Harvey) brought up Mexico City's memorialization of the 1968 Tlatelolco Massacre, which took the form of a neon monument on the foreign affairs building. Went on to comment that the exterior of the MLK Jr. Memorial Library said nothing about Dr. King, and should.

   a. Stated that activity is vital for a destination building in an urban city, and asked how the library's philosophy was being transmitted to its interior design.

   b. DCPL stated that the design of the building was for the people and not for formats. The hope is to create something that won't be outdated in five years and will offer what other libraries offer. The library hopes to double the amount of visitors per day. Stated that designing for the people is the focus while other things can take a backseat in the philosophy. Stated that it is exciting to discuss and develop the spirit of the program.

6. Downtown BID (Gerry Widdicombe) stated that the group was supportive of the library's goals and programs. Stated that the library should be bright, flexible and welcoming, and noted it is located in the best downtown location.

   a. In support of the increase of useable public space – a projected increase of sixty-three percent, creation of the first floor café with seating, open stairwells, creation of a meeting space within the current loading dock, removal of a selection of exterior brick walls, a change in the sidewalk material, creation of the roof deck, and the incorporation of a piece of exterior sculpture.

7. CFA (Thomas Luebke) began his comments by saying that the Commission was scheduled to review the project within the next few days.

   a. Identified the challenge of keeping a functioning library, which would contribute to the city, and commemorate Dr. King.

   b. Complemented the extremely responsive efforts made by the DCPL and NCPC during this regulatory process.

   c. Noted that it was tempting to improve on what might have been, but it was important to remember the history we have been handed and that it was important that this existing history be honored.

   d. Remarked it was important that one understands three things when the building is entered: people, Dr. King, and the way in which one moves around the building.

   e. Held that the preferred alternative aligned with preservation principles.

8. Penn Quarter Neighborhood Association (Jo-Ann Neuhaus) was in support of the removal of the Ninth Street wall and the creation of an outdoor café. Paraphrased Jane Jacobs by saying that cafes put eyes on the street. Recognized that this change would cause damage to the building's historic fabric, but felt it was necessary to help the city and society.

9. SHPO called for the quantification of historic material to be removed, to be illustrated with demolition plans.

   a. NCPC responded that this quantification had not yet been completed, but could be created with the architect.
b. SHPO mentioned MA’s comment about retention of the core wall, which could be a mitigation measure.

c. SHPO also asked how the new Historic Structures Report (HSR) would be different than the library’s approved existing guidelines.

d. EHT (Emily Eig) responded that the HSR would be a more complete document, a compendium of all of the information that has been collected up to this point. The document would provide more insight, including existing conditions, and the manner in which to remediate existing issues. Stated that the existing guidelines would be referenced, but that they were written with the intention of maintenance of the existing building, as opposed to the new HSR, which will be more forward thinking.

10. MLK Friends commented that the project could be summarized in two words: Books and Bricks. Ms. Diener went on to state she teaches adult literacy and the people she teaches think the existing library looks like a prison, and that these people are the people the library has to reach. The building has to be made more welcoming and accessible.

a. Ms. Diener commented that she was open to the introduction of new technology within the building, but felt that a grand reading room, and not the planned auditorium, should be constructed on the fourth and fifth floors, stressing that the pride of place within the library should be put to books. Voiced concern over the accessibility of this area during an event and if the staircases and elevators would have enough capacity for events. Supported the creation of an auditorium space on the first floor in place of the existing loading dock which would be accessible to everyone.

b. DCPL commented that there was a lot of discussion on this issue. The proposed use on the fourth and fifth floors would create a level of continuity, and that people would not have to be moved around the building, interrupting normal operations. Also preferred that storage was below grade. Stated that these comments did not mean disagreement with Ms. Diener’s opinion, but served as an explanation of the thought process for the proposed use. DCPL referenced how the New York Public Library handled events. DCPL explained their desire to create a destination on the fourth and fifth floors, and held that the staircases and elevators would provide enough access for this purpose.

Conclusion and Next Steps

The meeting closed by noting the project would be presented to CFA on Thursday (7/16) and to HPRB on the following Thursday (7/23). The fourth consulting party meeting would be held in the fall and would focus on mitigation. The presentation given at the third consulting party meeting was to be posted on NCPC’s website and a link to the website would be on DCPL’s website. Public comment on the project and material presented would be taken until July 28, 2015.

Additional Comments

See enclosed.

Minutes prepared by Bill Marzella & Kimberly De Muro, EHT Traceries, July 15, 2015 (revised August 11, 2015)
August 12, 2015

Ms. Jennifer Hirsch
National Capital Planning Commission
401 9th Street NW, Suite 500
Washington, DC 20004

Re: Martin Luther King Jr Memorial Library, Section 106 Consulting Party Meeting 2 Comments

Dear Ms. Hirsch:

The District of Columbia State Historic Preservation Office (SHPO) offers the following comments on materials distributed in conjunction with the Section 106 Consulting Party Meeting held on July 14, 2015 for the renovation of the Martin Luther King Jr Memorial Library. The Library, including the first floor public spaces, was designated a D.C. Landmark in 2007 and was subsequently listed in the National Register of Historic Places.

We are pleased to see the development of revised Alternative B.2 for the roof addition, which offers a more successful approach to the Miesian symmetry of the building without being replicative. The modifications to the proposal have limited the amount of demolition to the façade and stair core walls and have kept much of the new construction within the vertical circulation cores.

While overall effects have been reduced through these changes, we agree with the potential adverse effects identified at the meeting, including effects to the building’s form and massing, interior circulation pattern, and loss of fabric through removals of the roof, site walls, plaza paving, interior center core walls, rear lobby wall, and vestibule walls. We do not agree that the enclosure of the rear loading dock would have an adverse effect in and of itself; however, connecting the space to the library via new door openings in the lobby wall would affect the historic lobby. We seek further information on the effects to reading rooms (if any) and to original furnishings, built-in amenities, and equipment (i.e. the central information desk, built in desk along the rear lobby wall, book dumbwaiters, phone booths, water fountains, elevator cabs, etc.).

As the project evolves, the SHPO looks forward to a thoughtful exploration of ways to continue to avoid and/or minimize effects. To that end, we recommend leaving intact some of the center core walls on the upper floors, some of the original stairwells and handrails, the vestibule walls except the center recessed area, and more of the rear lobby wall where the pivoting doors are proposed.

To further evaluate adverse effects and develop mitigative actions commensurate with those effects, it would be helpful to quantify the amount of historic fabric removal and the changes to the library’s character through more detailed demolition and construction plans.

Please note that the project was reviewed on July 23, 2015 by the District of Columbia Historic Preservation Review Board (HPRB), under the city’s Historic Landmark and Historic District Protection Act of 1978 (D.C. Law 2-144, as amended). At that public meeting, the HPRB approved the project in concept.
The SHPO looks forward to continued consultation on this important project. If you should have any questions, please do not hesitate to contact Anne Brockett at anne.brockett@dc.gov or 202-442-8842. Thank you for providing this office the opportunity to comment.

Sincerely,

Anne O. Brockett
Architectural Historian
Thank you for the open discussion opportunity for the MLK Library project.
I confine my views on the historic context in the urban setting and continue to insist that Mies himself saw this building one or two storey higher in the same cladding treatment.
Further to my comment on Mies' original vision for his building, the ground floor could be opened up more if not completely, to provide urban public spaces to liven up the neighbourhood with weekly markets stalls, food and cafe and other activities under cover.
To honor the memory of the great architect, the hard landscape for this big covered space could, say, detailed to the footprint of the Barcelna Pavilion. in other words, the project architect might have to be the interpreter of Mies rather than of his own ego.!!!!!
This landscaping ideas for the roof and the terrace would seem a high cost item for maintenance and underused facilities. Elevator motor rooms, air handling plant rooms seem to be missing. A more realistic approach would be to integrate solar collectors, winter garden, greenhouse landscaped reading spaces.