

MARTIN LUTHER KING JR. MEMORIAL LIBRARY REHABILITATION AND MODERNIZATION

901 G Street NW
Washington, DC 20001

September 22, 2016

Finding of No Significant Impact

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations (40 CFR, Parts 1500-1508), and the National Capital Planning Commission's (NCPC) Environmental and Historic Preservation Policies and Procedures, I have evaluated the preliminary and final site and building plans for the Martin Luther King Jr. Memorial Library Rehabilitation and Modernization as shown on NCPC Map File No. 21.00(38.00)44421; the Martin Luther King Jr. Memorial Library Rehabilitation and Modernization Environmental Assessment (EA) prepared by the National Capital Planning Commission; and the comments NCPC received on the EA. The EA is incorporated into this Finding of No Significant Impact (FONSI) by reference. Based on the foregoing, I have determined that Alternative B: Fifth Floor Trapezoidal Addition will not have a significant impact on the human environment and therefore an Environmental Impact Statement will not be prepared.

Purpose and Need

The purpose of the proposed project is to rehabilitate and modernize the Martin Luther King Jr. Memorial Library (MLK Jr. Library) to provide a world-class and sustainable central city library.

The project is needed because deferred maintenance has resulted in deficient building systems that do not meet current standards. Completed in 1972, the building's major systems, including heating, cooling, plumbing, electrical, and elevators, are outdated and need to be replaced. In addition, egress is inadequate and hazardous materials are present throughout the building and require remediation.

The project is also needed to meet the expectations of modern day library users and establish a truly 21st century central library for the District. As the methods in which people use public libraries to navigate complex networks of information have evolved, libraries have to adapt their operations and services accordingly. The District of Columbia Public Library (DCPL) determined several requirements of a 21st century library including the following: open floor plan that includes clear and well defined horizontal and vertical circulation; flexible interior and exterior spaces that promote collaboration and innovation, and that enhances library programming; designation spaces distributed throughout the facility to promote user movement; and connectivity to the city visually.

Proposed Action

DCPL is proposing to rehabilitate and modernize the MLK Jr. Library, located at 901 G Street, NW, Washington, DC. The project includes the construction of an addition on the roof that will include an event space. Specific areas to be renovated include: building envelope and cladding; glazing; site walls; plaza/loggia paving; loading dock; vehicle ramps; building systems including elevators; lighting; vertical circulation (stairs); and interior layout and configuration.

The following will be incorporated into the project: a renovated two-story reading room; digital computer center; classrooms and training facilities; innovation and creativity commons; co-working and collaboration spaces; gathering spaces for performances, readings, and civic engagement; history center, flexible spaces for use by city agencies or like-missioned non-profits; and auxiliary spaces such as a café, a welcome center, and event space with a catering kitchen.

The proposed action will include many environmentally sustainable elements including making the building more energy efficient as well as more comfortable for occupants. DCPL will seek a minimum of LEED®-Silver certification from the U.S. Green Building Council.

Alternatives

Four alternatives were considered in the EA including a No-Action Alternative and three action alternatives: Alternative A: Fifth Floor Existing Screen Addition; Alternative B: Fifth Floor Trapezoidal Addition; and Alternative C: Fifth Floor Extruded Addition. The EA also included two options for the treatment of the existing vehicle ramps: Option 1: Retention of vehicle ramps and Option 2: Two-way west ramp (eliminate east ramp at 9th Street). Alternative B with Option 2 for the vehicle ramps is identified as the selected alternative and is the alternative for which NCPC is issuing this Finding of No Significant Impact. The alternatives are described in Chapter 2 of the EA and the selected alternative is summarized below.

Alternative B: Fifth Floor Trapezoidal Addition

Alternative B will include the construction of a fifth floor addition of approximately 64,135 square feet on the existing roof. The addition will have a trapezoidal form with curved corners. The addition has been set back from the edge of the roof to minimize its visibility. Along with the addition, a new roof terrace will be provided and therefore a glass railing will be installed along the perimeter of the roof, with a setback of five feet along each elevation from the existing parapet. The existing roof membrane and ballast will be removed and replaced. The new terrace will be paved and will feature a mix of raised planting beds, seating areas, and open space. The roof terrace will be lit to allow for use at night with up lighting and spotlighting that will be minimal. On the uppermost roof level, a green roof will be installed to reduce heat gain, improve the roof aesthetic and capture rainwater for irrigation of the fifth floor terrace.

Alternative B includes a modernization of the exterior and interior of the building. On the exterior, the steel structure and cladding will be upgraded to address deterioration and improve energy efficiency. Portions of the brick site walls throughout the site will be lowered in order to increase visibility into the building. Along the south façade, at the south cores, a portion of the brick wall

will be removed and replaced with glazing. At the northeast corner of the site, the east vehicle ramp will be eliminated in order for an improved outdoor patio space near the intersection of G Place and 9th Street, NW. A new café and welcome center is proposed for the interior of the building in the east reading room directly adjacent to the patio space.

On the interior of the building, within the entrance lobby or vestibule, the brick walls will be removed and replaced with glazed partitions. Within the main lobby, the masonry partition walls along the north wall under the Martin Luther King Jr. mural will be removed and replaced with an opening for visitors to view informal events that occur in the lobby. The west reading room on the first floor will be reconfigured and fixed enclosures or small rooms will be added to accommodate program uses such as classrooms, meeting rooms, and offices. On the upper stories, the non-bearing masonry walls will be removed to open the space and allow for new library programs to be introduced. The existing glass partition walls providing access to the east and west reading rooms will remain intact on the second and third floors and new partitions will be added to the fourth floor. Along the third floor within the east reading room, the walls and a portion of the fourth floor slab will be removed to create a new adult reading room. On the fourth and fifth floors, a two-story auditorium will be placed in the center of the building.

Standard for Evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental and Historic Preservation Policies and Procedures, an EA is sufficient and an Environmental Impact Statement need not be prepared if the EA supports the finding that the major federal action will not significantly affect the human environment. The EA for this project was prepared in accordance with this standard.

Potential Impacts

No significant impacts were identified that will require analysis in an Environmental Impact Statement. Alternative B will result in either beneficial or adverse impacts to stormwater management; air quality; land use planning and zoning; economy, employment, and income; community facilities and services; historic resources, utilities; transportation; and environmental contamination. Impacts on affected resources are summarized below along with proposed mitigation.

Stormwater Management: Alternative B will result in a long-term, beneficial impact to stormwater management and water quality. A green roof and garden roof-top terrace will be provided to reduce heat gain, absorb rainwater and reduce runoff. These features will result in an overall net reduction in impervious surface for the site. Overall, there will be a decrease in stormwater discharge to the combined sewer system. The selected alternative will be in compliance with the District Department of Energy and Environment (DOEE) 2013 stormwater rule. Construction impacts will be avoided and minimized as much as possible by implementing Best Management Practices (BMPs) during construction, including the development of a sediment and erosion control plan with DOEE. The rehabilitation and modernization of the MLK Jr. Library would beneficially

contribute to the cumulative stormwater impacts by reducing the amount of impervious surface to the site.

Air Quality: Alternative B will result in a minor, long-term, direct, beneficial impact to interior air quality through the removal of hazardous building materials and mold to the standards set by District and federal regulations to safeguard the health of building occupants. The selected alternative will result in a temporary, minor, direct, adverse impact related to interior air quality due to the increased risks to construction workers during demolition. Safety measures will be employed during construction and demolition activities to mitigate this impact. No increase in traffic or diesel vehicles coming to the MLK Jr. Library is expected. Reasonable precautions will be taken to minimize emissions from construction vehicles in accordance with DC Municipal Regulations (DCMR) 20-600 through 606. Construction vehicles will not be permitted to idle for longer than three minutes at a time (or five minutes during below-freezing temperatures) unless engine idling is necessary for power takeoff equipment, in accordance with the DC Engine Anti-Idling Law. The rehabilitation and modernization of the MLK Jr. Library will not contribute to cumulative impacts on air quality.

Land Use Planning and Zoning: The selected alternative is consistent with the Federal and DC Elements of *The Comprehensive Plan for the National Capital* (NCPC, 2016; DC Office of Planning, 2006). The selected alternative is also consistent with existing land use and zoning designations. Because there will be no impact on land use and zoning, the selected alternative will not result in cumulative impacts to land use or zoning.

Economy, Employment, and Income: Alternative B will have minor, short- and long-term, beneficial impacts to economy, employment, and income in the surrounding area. No additional library staff will be hired. The café will create a small number of permanent jobs. Sales taxes will also be generated as a result of café sales. The rehabilitation and modernization of the MLK Jr. Library will result in a short-term need for construction workers. The rehabilitation and modernization of the MLK Jr. Library would add to the long-term beneficial cumulative impacts to the economy from the introduction of a café.

Community Facilities and Services: Alternative B will result in moderate, long-term, direct, beneficial impacts to the MLK Jr. Library by creating a safer, more comfortable, and more environmentally sustainable facility. The existing services provided by the MLK Jr. Library will continue to be provided. No impacts to police or fire and rescue response times are anticipated. The proposed project will not result in the removal or alteration of any adjacent properties or facilities. Alternative B will result in minor, short-term, direct, adverse impacts to community facilities and services because construction activities will require the temporary closure of the MLK Jr. Library. Alternate locations for library services at the MLK Jr. Library will be offered in a number of locations that include a new “Library Express” location that will house the Library’s Center for Accessibility and Adult Literacy Department. DCPL will offer expanded hours at all of its branches to encourage MLK Jr. Library users to visit neighborhood branches. In addition to the normal holds process, DCPL will rely on other services including Inter-library loan (ILL) and the reciprocal borrowing agreements that are currently in place with neighboring public library

systems in Virginia and Maryland. Other services, including the Library's Special Collections and its Labs, will be accessible with the help of partner organizations with whom DCPL is currently in discussion. The rehabilitation and modernization of the MLK Jr. Library will occur during normal construction hours set by DCRA – Monday through Friday, 7 am – 7 pm. The rehabilitation and modernization of the MLK Jr. Library will beneficially contribute to the long-term cumulative impacts to the community facilities and services from the creation of opportunities for cultural events, education, and entertainment and a café that will entice visitors to stay in the library for longer periods of time.

Historic Resources: MLK Jr. Library is listed in the National Register of Historic Places and the District of Columbia Inventory of Historic Sites. Alternative B will result in direct, long-term, adverse impacts to the MLK Jr. Library, as character-defining features of the building will be altered or removed which will reduce the integrity of the property. The construction of new elements such as an addition will also alter the character of the building and cause adverse impacts. Alternative B would also add to the overall long-term, adverse cumulative impacts on historic resources. Pursuant to Section 106 of the National Historic Preservation Act (NHPA), NCPC has consulted with the District of Columbia State Historic Preservation Officer and other Consulting Parties regarding the proposed project. For purposes of Section 106 of the NHPA, there will be an adverse effect on MLK Jr. Library. As part of the Section 106 process, NCPC, DCPL, and DCSHPO have entered into a Memorandum of Agreement that seeks to avoid, minimize, and mitigate the adverse impacts.

Utilities: Alternative B will result in minor, long-term, beneficial impacts to utilities because new energy efficient equipment will replace existing less efficient system, reducing the MLK Jr. Library's energy demand. Water conservation measures will result in a decrease of the total water consumption. The rehabilitation and modernization will not contribute to adverse cumulative impacts because modernizing the MLK Jr. Library will include measures to increase energy efficiency while decreasing the total water consumption.

Transportation: Alternative B with the implementation of Option 2 for the vehicle ramps will have a negligible to minor adverse impact on the surrounding roadway and pedestrian network. Alternative B will contribute slightly to the overall cumulative impacts on the transportation system. With Option 2, the east vehicle ramp will be closed and inbound and outbound traffic will use the west ramp. To control the traffic, a limited signal will be installed on DCPL property. Approximately two parking spaces will be removed to accommodate the traffic operational change for ingress and egress at the west ramp. In addition, as mitigation an Operational Management (O&M) Plan will be completed by DCPL prior to the completion of the rehabilitation and modernization of the MLK Jr. Library. The O&M Plan will discourage contraflow traffic on the west ramp and will also include how special events will be handled by the DCPL. The rehabilitation and modernization of the MLK Jr. Library would contribute to the long-term, adverse cumulative transportation impacts.

Environmental Contamination: Hazardous building materials including lead, asbestos, and PCBs, along with mold, will be removed from the building to the standards set by DC and federal

regulations to safeguard the health of building occupants. Because of the disturbance to hazardous building materials during demolition, the selected alternative will have a negligible, short-term, direct, adverse impact to construction workers during construction. However, the removal of hazardous building materials from the MLK Jr. Library will overall result in a moderate, long-term, direct, and beneficial impact related to environmental contamination. Remediation and cleanup required as a result of the rehabilitation and modernization of the MLK Jr. Library will result in beneficial cumulative impacts.

The asbestos abatement activities will be conducted by a DC licensed asbestos abatement contractor using properly trained and licensed workers in accordance with District, US Environmental Protection Agency (EPA) and Occupational Safety and Health Administration (OSHA) regulations. All areas where fireproofing spray is assumed or identified will be High-Efficiency Particle Air (HEPA) vacuumed and cleaned above ceiling tiles by certified individual(s) with proper training. Air samples will be taken throughout the building initially and every three months, six months and 12 months by an Industrial Hygienist. In areas where there are broken or chipped floor tiles, the flooring will be properly removed and replaced by individuals with proper training. Environmental monitoring will be performed by an EPA accredited inspector both during and after asbestos removal. If any friable materials are found prior to or during demolition, such materials will be removed and disposed of in accordance with state, EPA, and DOT regulations, including the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP). The District and the EPA Region 3 Office will be notified.

Demolition of lead-based paint components will be completed in accordance with the requirements of the OSHA Lead in Construction standard. Items treated with lead-based paint will be segregated from other wastes to be tested separately. Disposal of lead wastes determined to be hazardous will be disposed of according to EPA regulations (40 CFR 261(c)).

The Phase I Environmental Site Assessment identified three leaking pad-mounted electrical transformers in the basement of the MLK Jr. Library, which potentially contain Polychlorinated Biphenyls (PCBs). The leaking equipment will be separated and placed into DOT-approved 55-gallon metal drums. They will be recycled or incinerated at an approved facility in accordance with EPA regulations (40 CFR 761) rather than disposed at a municipal solid waste landfill.

Mold remediation will be conducted by an indoor mold remediation professional certified and licensed by the District of Columbia, in accordance with the Air Quality Amendment Act. Moldy ceiling tiles will be removed and replaced.

//Original Signed//
Marcel Acosta
Executive Director

Attachment 1: Errata Sheet

Since the publication of the EA, there has been a slight modification to Option 2 for the Automobile Ramps as a result of consultation and coordination with DDOT. There would be no changes to the analysis/environmental effects as a result of this modification. This errata sheet documents the modifications to the text of the Martin Luther King Jr. Memorial Library Rehabilitation and Modernization EA. Additions to the text are identified by bold lettering and deletions are marked by ~~strikeout~~ unless otherwise noted.

Automobile Ramps:

Several options for the automobile ramps have been considered for each of the alternatives under consideration. These include:

- Option 1: The existing automobile ramps will remain in place. Portions of the surrounding walls will be lowered or removed to improve visibility across the site. Minor adjustments will be made to the ramp inlets and outlets to improve accessibility.
- Option 2: Two-way Ramp into/out of the MLK Jr. Library Parking Garage. Under this option the egress ramp at 9th Street, NW would be removed and the ingress ramp from G Place, NW would accommodate vehicles entering and exiting the garage. The direction of traffic along G Place, NW would **remain unchanged**~~be changed from one-way to two-way traffic from 10th Street, NW to the Alley. From the Alley to 9th Street, NW, the traffic would remain one-way, eastbound.~~ A limited signal would be installed on DCPL property to control vehicles **entering and** exiting the MLK Jr. Library garage. Approximately **one to two** parking spaces **across G Place, NW from the MLK Jr. Library parking garage entrance by the U.S. Secret Service** would be removed to accommodate **cars exiting the MLK Jr. Library parking garage** ~~the traffic operational change~~. Geometric changes to the curb cut for the DCPL traffic and the curb adjacent to the church's parking garage entrance; and the removal of a portion of the wall would also occur.

ATTACHMENT 2: NCPC RESPONSE TO COMMENTS

Martin Luther King Jr. Memorial Library Rehabilitation and Modernization Public Review EA Comments

Name	Association	Comments	Response
Jamie Henson	District Department of Transportation (DDOT)	DDOT requires applicants to complete a Comprehensive Transportation Review (CTR) as part of the EA to determine the action’s impacts on the transportation network. DCPL and DDOT agreed on a scope of the CTR that is consistent with the scale of the action. DDOT’s review of the CTR determined minimal impacts would result to the road network as a result of the action.	Comment noted.
		DDOT’s review focused on proposed changes to loading access and vehicular site access. DCPL proposes to replace the existing non-standard loading curb cuts with standard curb returns. Final design of the loading access must be coordinated with DDOT’s public space permitting process.	Comment noted. DCPL will obtain all public space permits needed through DDOT’s permitting process.
		DCPL proposed to accommodate ingress and egress parking garage activity from the western ramp and to eliminate the eastern ramp. DCPL and DDOT coordinated to determine an acceptable design and operations plan to accommodate this access arrangement. Final design of the vehicular site access will be determined with DDOT’s public space permitting process.	Comment noted. DCPL will obtain all public space permits needed through DDOT’s permitting process.
		DCPL will need to obtain a public space permit through DDOT’s permitting process for access points and any fixtures or improvements in the District’s public space.	Comment noted. DCPL will obtain all public space permits needed through DDOT’s permitting process.

Name	Association	Comments	Response
Chris Otten, co-facilitator	DC Reasonable Development	What is a consulting party?	<p>A consulting party is defined by the Advisory Council on Historic Preservation in the Section 106 regulations (36 CFR 800). The definition is also summarized in the Advisory Council on Historic Preservation’s <i>Protecting Historic Properties – A Citizens Guide to the Section 106 Process</i>: “The following parties are entitled to participate as consulting parties during Section 106 review:</p> <ul style="list-style-type: none"> • Advisory Council on Historic Preservation; • State Historic Preservation Officers; • Federally recognized Indian tribes/THPOs; • Native Hawaiian organizations; • Local governments; and • Applicants for federal assistance, permits, licenses, and other approvals. <p>Other individuals and organizations with a demonstrated interest in the project may participate in Section 106 review as consulting parties “due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking’s effects on historic properties.” Their participation is subject to approval by the responsible federal agency.”</p>
		What DC-wide Advisory Neighborhood Commissions were involved with the MLK Jr. Library Project?	NCPC identified ANCs 2C and 6E as consulting parties for the MLK Jr. Library Rehabilitation and Modernization project.
		What public involvement forums have taken place for the MLK Jr. Library Project?	<p>As noted in Section 1.5 of the EA, NCPC initiated the NEPA/Section 106 processes via a Public Scoping meeting that was held on October 7, 2014. NCPC, in coordination with DCPL, also held four additional consulting party meetings including the following: November 19, 2014; July 14, 2015; December 16, 2015; and August 24, 2016. Through the NEPA and Section 106 processes, NCPC has shared the designs for the Martin Luther King Jr. Library (MLK Jr. Library) from concept design through design development and has solicited comments from the public at each stage.</p> <p>In addition to the Section 106 consultation, DCPL facilitated a number of public meetings to solicit comments from the community. DCPL used an online crowdsourcing platform, dclibrary.ideascale.com to gather input on</p>

Name	Association	Comments	Response
			<p>what a modernized library should provide for teens, children, adults, persons with disabilities, DC history, meetings and more. More than 2,000 people shared ideas for a modernized MLK Jr. Library. In addition, DCPL created the MLK Advisory Panel, consisting of representatives from a number of diverse stakeholder groups around the city, prior to the selection of the architect. DCPL engaged the MLK Advisory Panel throughout the project’s concept design and design development phases and revised the project plans in response to many of the panel’s comments.</p>
Lois Berkowitz	Unaffiliated	Strongly in favor of the District’s archaeological collections being stored in the MLK Jr. Library.	Comment noted.
S. Terry Childs	Unaffiliated	Strongly supports the Archaeological Collections Storage and Exhibit Space in the MLK Library	Comment noted.
Stuart Gosswein	Committee of 100	The Committee of 100 has participated in the Section 106 process and as a member of the Advisory Panel, and has provided comments through both venues. We are very supportive of the project generally and the evolved plan.	Comment noted.
Meg Maguire	Member of the Advisory Panel and Representative of the First Congregational United Church of Christ	The first floor of the building is landmarked and, therefore, the brick walls at the front of the building that reflect Mies’ symmetrical pattern should be retained.	In order to meet the goals of the rehabilitation and modernization project, one of which is to increase visibility, portions of the brick wall will be removed. The EA and the Section 106 Assessment of Effects documented that removal of the brick is an adverse effect. As part of the Section 106 process, a Memorandum of Agreement (MOA) documents stipulations that will be carried out to take into account the adverse effects of the project.
		The staircase is bulky and not in keeping with Miesian principles.	Throughout the design development process, DCPL has refined the design of the staircase in response to comments from many stakeholders. The staircase has been designed to be less bulky and more visually appealing such that the design would be understood to be separate from the National Register-listed Mies-designed building. The EA and the Section 106 Assessment of Effects report documented that the proposed project will result in adverse effects. A Section 106 MOA documents stipulations that will be carried out to take into account the adverse effects of the project.
		Supports a generous and inviting outdoor plaza on the NE corner café, accessible from 9 th St. and believe that steps connecting the plaza with 9 th	Due to operational concerns and for security reasons, the design does not include a set of stairs to enter the plaza from 9 th Street. In addition, the

Name	Association	Comments	Response
		St. would make the building accessible from two entrances rather than just one.	plaza is considered a by-product of the library experience and is not intended to function as the main entrance to the library.
		What are the calculations of the capacity of the elevator and the time it would take to exit the building under various scenarios?	The MLK renovation will contain 5 public elevators. The public elevator handling capacity during peak hours provides movement of 120 persons every 5 minutes. Industry standards rate this as a “Good” level of service. These numbers assume intermediate stops within a single round trip for all public elevators. Public Elevator handling capacity during an auditorium performance only, provides for 325 persons every five minutes. This meets 100% the seating capacity of the 287 seat auditorium. This assumes no intermediate stops on a single round trip. The existing north core shafts bounded by historic fabric i.e. elevators E3, and E7 can handle approximately two small wheel chairs per cab. Elevators E1, E2, (south core) and E6 (north core) can handle approximately three larger wheel chairs per cab.
		Request for a strong statement of intention in a well-written architectural program.	DCPL is preparing a Historic Structure Report (HSR) for MLK Jr. Library and the HSR includes detailed information on the design approach and the implications of historic designation. The HSR will be made available as a component of the online exhibit upon completion in accordance with Stipulation IV.A.4 of the MOA.
Robin Diener, President	MLK library friends	Public Input – Adequate public involvement has not been undertaken by DCPL regarding the renovation of the MLK Memorial Library. Various scenarios DCPL has utilized in the name of public input have been misrepresented or simply have not worked.	<p>As noted in Section 1.5 of the EA, NCPC initiated the NEPA/Section 106 processes via a Public Scoping meeting that was held on October 7, 2014. NCPC, in coordination with DCPL, also held four additional consulting party meetings including the following: November 19, 2014; July 14, 2015; December 16, 2015; and August 24, 2016. Through the NEPA and Section 106 processes, NCPC has shared the designs for the MLK Jr. Library from concept design through design development as they have been developed and has solicited comments from the public at each stage.</p> <p>In addition to the Section 106 consultation, DCPL facilitated a number of public meetings to solicit comments from the community. DCPL used an online crowdsourcing platform, dclibrary.ideascale.com to gather input on what a modernized library should provide for teens, children, adults, persons with disabilities, DC history, meetings and more. More than 2,000 people shared ideas for a modernized MLK Jr. Library. In addition, DCPL created the MLK Advisory Panel, consisting of representatives from a number of diverse stakeholder groups around the city, prior to the</p>

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			selection of the architect. DCPL engaged the MLK Advisory Panel throughout the project's concept design and design development phases.
		Best Use of a Natural Resource: Light – The Auditorium/Conference Center planned for the fourth and fifth floors cannot benefit greatly from the natural light available from the roof.	While natural light is beneficial for many uses in the library it is also beneficial for an auditorium. While there may be a need on occasion to block or shade the natural light there are also occasions that the natural light will provide a welcome benefit. Events such as musical performances, book readings, talks or lectures, perhaps a dance performance, can all benefit from natural light. In addition, this is an extremely beneficial opportunity for the library for a pre-auditorium event or a post auditorium event experience allowing guests not only exposure to natural light and views, but to the out of doors environment. The proposed adult reading room on the third floor is located on the east side of the building along an exterior wall that will provide natural light.
		Off- Center Reading Room Is an Adverse Effect – The creation of a two-story reading room on one side only and unlike anything else in the building, destroys the buildings perfect symmetry and is an adverse effect that cannot be mitigated.	NCPC and DCPL identified the cut in the ceiling for a two-story reading room as an adverse effect in the EA and the Section 106 Assessment of Effects. The Section 106 MOA documents stipulations that will be carried out to take into account the adverse effects of the project.
		Location of the Auditorium/Conference Center – Size and placement of auditorium on 4 th /5 th floor is questionable. Visitors unlikely to walk up to 4 th /5 th floor. Preferable to put auditorium on lower level where access would be easier.	DCPL identified the 4 th and 5 th floors as the most conducive for the location of a two-story auditorium from an architectural perspective. , The column-free nature of the space and the ability to span two floors vertically made the 4 th and 5 th floors the ideal location. The breakout and pre/post-event spaces would benefit the library guest with a direct connection to the roof terrace. A lower level auditorium is limited by ceiling heights and a landmarked first floor. DCPL grouped the auditorium with the conference center on the 4 th floor to accommodate groups that want to have a larger event as well as break-out sessions. Additionally, groups will be able to reserve any of the many meeting spaces for community meetings such as ANC meetings.
		Roof Garden – One of the most looked-forward-to ideas from the renovation of the MLK Library is that of a garden or public park on the roof. It is not clear what safety measures will be put in palce.	The guard rail surrounding the public roof terrace is designed to meet building codes and the requirements and regulations of the District of Columbia. A 42-inch full panel glass guard rail with a five-foot set back from the building edge minimizes visibility from the street and provides the necessary safety to library patrons. Operationally the roof terrace will be supervised by DCPL staff during hours of library operation. Similar

Name	Association	Comments	Response
		<p>Memorializing MLK – Only a few ideas for further memorializing Dr. King have come forward as a result of the community engagement process. None of these ideas have been publicly discussed.</p>	<p>code compliant conditions can be found on buildings throughout the District of Columbia.</p> <p>As part of the Section 106 process, a MOA documents stipulations that will be carried out to take into account the adverse effects of the project. Stipulation IV.A of the MOA documents the exhibit and the design consultation process that will be required to honor Martin Luther King, Jr. and his work in the District of Columbia.</p> <p>In addition, DCPL will launch a local public art competition to solicit permanent art that will honor Martin Luther King Jr.</p>
		<p>Front facades – Supports removal of brick from the south (front) façade to make the entrance more welcoming. Notes security concerns of the existing building and lack of visibility.</p>	<p>Comment noted. A portion of the brick walls in the front of the library will be removed and replaced with glass to increase visibility.</p>
		<p>Gathering Space off the Great Hall – Does not support removing any of the brick in order to create a small space or alcove. The alcove detracts from the historic mural above it.</p>	<p>Comment noted. NCPC and DCPL have identified the removal of brick from the north inside wall underneath the MLK mural as an adverse effect in the EA and the Section 106 Assessment of Effects. A MOA documents stipulations that will be carried out to take into account the adverse effects of the project.</p>
Alexander Nagel	Unaffiliated	<p>Encourages and supports the inclusion of the archival storage space for the District Archaeology, DC Historic Preservation Office at the MLKML, in perpetuity.</p>	<p>Comment noted.</p>
Jo-Ann Neuhaus	Unaffiliated	<p>Request to include additional provision in the MOA to consult further on the stairway design.</p> <p>Suggested specific language and edits in reference to MOA signatories</p> <p>Notes that DCPL should have the ability to alter and update the exhibit.</p>	<p>Stipulation II.A of the MOA provides for design consultation on additional items not specifically listed therein.</p> <p>Language referring to Signatories edited to clarify the specific roles and responsibilities of each organization.</p> <p>Stipulation III.A.3 allows DCPL to maintain and update the exhibit, requiring no further consultation after the MOA expires.</p>
Rhonda	Unaffiliated	<p>Against a mixed-use concept for the project.</p>	<p>The DCPL board of trustees eliminated the mixed-use concept from consideration in January 2015.</p>

Name	Association	Comments	Response
		<p>The project should have numerous public uses including a program to feed the hungry; a recreation facility for children; interactive galleries; opportunities for artists to display their work; and a Center for Peace and Cultural Understanding where people can learn about and experience different cultures.</p>	<p>The renovated central library will have many services that meet the diverse needs of District of Columbia residents including services for children, teens, and adults. Additionally, DCPL will provide a host of cultural programs, workforce development, digital literacy services, adult literacy and accessibility services.</p>
		<p>The library needs to honor Martin Luther King Jr. and his legacy.</p>	<p>DCPL has issued many forms of both rendered images as well as planned homage's to both Dr. King and the legacy of his life's work. In addition, a MOA has been drafted that documents stipulations that will be carried out by DCPL to take into account the adverse effects of the project. Stipulation IV.A documents the exhibit and the design consultation process that will be required for an exhibit that will honor Dr. Martin Luther King, Jr., and his work in the District of Columbia. In addition, DCPL will launch a local public art competition to solicit permanent art that will honor Martin Luther King Jr.</p>
Suraj K. Sazawal	Casey Trees	<p>Supports green roof concepts in Alternatives A and B.</p>	<p>Comment noted.</p>
		<p>Rooftop trees would provide a shady outdoor gathering space and lower indoor and outdoor temperature through evapotranspiration.</p>	<p>Comment noted. Plans call for pollinators, grasses, and perennials to be planted in the rooftop garden.</p>
		<p>Trees that are removed due to construction should be replaced at a 3:1 ratio. Ratio can be achieved by increasing the number of street tree boxes or planting trees on the green roof.</p>	<p>Trees will be replaced in accordance with District of Columbia regulations including DDOT's Downtown Streetscape Regulations. All improvements in public space will also be permitted through DDOT's permitting process.</p>