

IN REPLY REFER TO:
NCPC FILE No. 7610

September 17, 2014

Mr. David Maloney
State Historic Preservation Officer
for the District of Columbia
1100 4th Street, SW
Suite E650
Washington, DC 20024

Re: Initiation of Section 106 Consultation, Martin Luther King, Jr. Memorial Library Renovation and Expansion

Dear Mr. Maloney:

The District of Columbia Public Library (DCPL) is proposing to renovate and rehabilitate the Martin Luther King, Jr. Memorial (MLK) Library located at 901 G Street, NW in Washington, DC. The National Capital Planning Commission (NCPC) is writing to initiate consultation with the District of Columbia State Historic Preservation Officer (DC SHPO) in compliance with Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. § 470f) and its implementing regulations (36 CFR § 800). The proposed project is subject to the review and approval of NCPC under the National Capital Planning Act and NCPC's approval of the project is considered an undertaking.

The purpose of the proposed project is to rehabilitate and modernize the MLK 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. In addition, the project is needed to meet the expectations of modern day library users and establish a truly 21st century central library for the District of Columbia. As the methods in which people use public libraries to navigate complex networks of information and convert that information into knowledge evolve, libraries have to adapt their operations and services accordingly. The DCPL has determined the following to be requirements of a 21st century central library: 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; destination spaces distributed throughout the facility to promote user movement; and connectivity to the city visually. To ensure the long-term viability of the MLK Library, the project may include the construction of additional space for non-library uses through the use of a public-private partnership.

As proposed, the project would be developed by DCPL and may entail leveraging the resources of a public/private partnership yet to be identified, allowing the property to remain as the permanent home of MLK Library. The project proposes to renovate the building: rehabilitate the building's exterior and interior

landmarked spaces; enhance the exterior plaza and public space; introduce a mix of uses; improve accessibility and visibility throughout the building; upgrade existing systems; and address the needs of the neighborhood, residents, and visitors.

To prepare for the Section 106 consultation process, DCPL and NCPC have developed the enclosed list of consulting parties and a graphic illustration of the proposed Area of Potential Effects (APE). These items are intended as a basis of discussion and are subject to modification through the consultation process. The proposed APE for this project includes the area from which the project site is readily visible and is generally bound by 7th Street, NW on the east, Eye Street and New York Ave, NW on the north, 13th Street, NW on the west, and F and E Streets, NW on the south. A preliminary list of historic resources within the APE includes portions of the Plan of the City of Washington (L'Enfant Plan; L'Enfant-McMillan Plan), Downtown Historic District, and Pennsylvania Avenue National Historic Site. It also includes the following historic resources individually listed in the National Register and/or the District of Columbia Inventory of Historic Sites: MLK Library, Victor Building, Mercantile Savings Bank, Daniel Webster School, Washington Hebrew Congregation (Greater New Hope Baptist Church), Greyhound Bus Terminal, Masonic Temple (National Museum of Women in the Arts), McLachlen Building, Woodward & Lothrop, Saint Patrick's Church, Equitable Cooperative Building Association, Old Masonic Temple, Patent Office, Ford's Theatre National Historic Site, Atlantic Building, National Union Building, Washington Loan and Trust Company, LeDroit Block, General Post Office (General Land Office), Chesapeake and Potomac Telephone Company Buildings (Old Main Building and Dial Exchange), and Homer Building. The General Post Office and Patent Office have been further designated National Historic Landmarks. Additionally, the APE encompasses a portion of the Downtown Historic District Amendment and Boundary Expansion, which is currently under consideration for status as a District of Columbia Historic District. The area in the vicinity of MLK Library has been extensively documented; therefore, it is not anticipated that additional survey to identify potentially affected resources will be required.

At this time, NCPC has determined that the project has the potential to have an adverse effect on the MLK Library. Constructed in 1969-1972, MLK Library was listed in the District of Columbia Inventory of Historic Sites and the National Register of Historic Places in 2007. The designation included the building exterior, surrounding plaza, and the interior public spaces on the building's first story. The nomination recognized the building's significance as the only example of the work of master Modernist architect Ludwig Mies van der Rohe in the District of Columbia, as well as his only executed library design. Although it was completed after the architect's death, MLK Library exhibits the formal, structural, and material qualities that were characteristic of his work. It is also significant as the first memorial to Dr. Martin Luther King, Jr. in the District of Columbia following his assassination. Following the landmark designation, DCPL collaborated with the District of Columbia Historic Preservation Office and others to complete a set of Design Guidelines that would inform the continued maintenance and stewardship of this resource. The Design Guidelines were adopted by the District of Columbia Historic Preservation Review Board in 2012.

The proposed project seeks to reinvigorate the interior and exterior spaces of MLK Library while preserving its significant architectural character and features. Although alternative design concepts are still being

developed, including several alternative rooftop additions to the building, the proposed project intends to utilize a variety of preservation treatments that reflect the guidance of the National Register documentation and associated Design Guidelines. The proposed project will also address the multiple deficiencies inherent in the facility's operation, environmental performance, and use. Each of the proposed rooftop addition alternatives has been envisioned to respect the architectural character of MLK Library as well as the framework of the L'Enfant-McMillan Plan and its associated streets, views, and vistas. The site has been extensively disturbed and no significant excavation is being proposed; therefore, this project will not be evaluated for its potential to affect archaeological resources.

NCPC is prepared to work with the DC SHPO, the Advisory Council on Historic Preservation, and other consulting parties to finalize a formal determination of effect through the Section 106 consultation process. We welcome the opportunity to identify and evaluate modifications to the proposed project that will avoid, minimize, or mitigate potential adverse effects on historic properties within the APE.

In accordance with the National Environmental Policy Act (NEPA) and in cooperation with DCPL, NCPC is preparing an Environmental Assessment to analyze potential impacts associated with the range of alternatives under consideration. Three alternative concepts in addition to the no-action alternative will be analyzed in the EA:

- Rehabilitation with 5th floor curvilinear roof design
- Rehabilitation with 5th floor orthogonal roof design
- Rehabilitation with 5th floor roof design and three story addition

NCPC plans to coordinate the Section 106 and NEPA processes per the implementing regulations (36 CFR § 800.8) of the NHPA. A public scoping meeting will be held on Tuesday, October 7, 2014, from 6:30 until 8:30 pm at the Martin Luther King, Jr. Memorial Library located at 901 G Street, NW, Washington, DC. This public scoping meeting will act as the first consulting party meeting and will include an introduction to the Section 106 consultation process.

We look forward to beginning the Section 106 consultation process for this project. If you have any questions, please contact Jennifer Hirsch, Federal Preservation Officer, at (202) 482-7239 or at jennifer.hirsch@ncpc.gov.

Sincerely,

// ORIGINAL SIGNED //

Marcel Acosta
Executive Director

Enclosures

cc: Chris Wilson, Advisory Council on Historic Preservation