



National Capital Parks – East
Robert F. Kennedy Stadium Demolition Environmental Assessment
Washington, DC



ROBERT F. KENNEDY STADIUM DEMOLITION PROJECT

**ENVIRONMENTAL ASSESSMENT
SEPTEMBER 2023**

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PURPOSE AND NEED

INTRODUCTION

The National Park Service (NPS) is proposing to authorize the District of Columbia through Events DC to demolish the Robert F. Kennedy Memorial Stadium (RFK Stadium) located at 2400 East Capitol Street NE, Washington, DC. The District of Columbia plans on using the site for other uses permitted by lease with the United States.

The RFK Stadium is owned by the District of Columbia and the responsibility for operating and managing RFK Stadium (and its parking lots) has been given to the Washington Convention and Sports Authority, now referred to as Events DC (Events DC). However, the land on which the RFK Stadium is located is owned by the United States and administrated by the NPS as part of Section F of Anacostia Park.

Purpose and Need for the Action

The *purpose* of the proposed action is for the NPS to authorize the District of Columbia through Events DC to demolish the RFK Stadium, which is located on land owned by the United States and administrated by the NPS. The proposed action is *needed* as the RFK Stadium is over 60 years old and has reached the end of its useful life. The facility was decommissioned in 2019 and no longer serves its intended purpose as a sports and entertainment venue. Furthermore, the building is no longer occupied, repaired, maintained, or otherwise upkept. Non-structural demolition work that has been completed to date includes, but is not limited to, the abatement of hazardous materials and the removal of stadium seating, furniture, fixtures, equipment, trash, and debris. The proposed action is required as the RFK Stadium needs to be demolished based on age and current condition.

This EA describes two alternatives for the demolition of the RFK Stadium, an action alternative and a no action alternative, and analyzes the environmental consequences of implementing the alternatives. The EA was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 as implemented by Council for Environmental Quality regulations (40 CFR 1500-1508); NPS Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making; and the NPS NEPA Handbook (NPS, 2011b, NPS, 2015a). In conjunction with this EA, the project is concurrently undergoing a review of potential effects on historic resources in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).

BACKGROUND AND PROJECT AREA

The RFK Stadium is located on a 190-acre campus to the west of the Anacostia River and to the east of Barney Circle and Kingman Park neighborhoods. At the beginning of 20th century, the federally owned land on which the stadium sits was predominantly used as park land and open space (see **Figure 1**). In 1957, the DC Armory Board was directed by Congress to begin construction on the stadium. The authorizing legislation, the District of Columbia Stadium Act (P.L. 85-300) directed the Secretary of the Interior to acquire real property on East Capitol Street and to contract with the D.C. Armory Board for the construction, maintenance, and operation of a new stadium. Per the Act, the District of Columbia would front the cost of construction, but the stadium and the grounds would remain federal property with revenue from the stadium offsetting the initial investment from the city. Construction was completed in 1961 at a cost of \$19.8 million, financed by the District of Columbia via issuance of 20-year revenue bonds. However, contrary to expectations, stadium revenue was never enough to offset both annual interest payments or bond principal, and by 1978 the District had paid \$12.8 million in interest but had made no payments on the principal. As such, the Carter Administration established the 1977 Presidential Task Force on the District of Columbia which addressed the repayment of the stadium bonds. The resulting plan determined that both the federal government and the District would be jointly responsible for the payment of the \$19.8 million principal, while the District would be solely responsible for the

\$12.8 million in interest. Due to the newfound financial burden, the plan additionally recommended that the title to both the stadium and surrounding lands be transferred to the District following the repayment of the bonds. The plan was enacted smoothly, facilitating the full payment of the loans and interest by 1979. However, the stadium remained the property of the Federal Government until 1986, with the D.C. Amory Board contracting with the National Parks Service for use of the Stadium. Transfer of the stadium was completed in 1986 with the adoption of a bill to amend the District of Columbia Stadium Act of 1957 to direct the Secretary of the Interior to convey title of the Robert F. Kennedy Memorial Stadium to the District of Columbia (P.L. 99-581). Importantly, the bill established a 50-year conditional lease on the ground under the stadium and surrounding parking facilities. The conditions outlined in P.L. 99-581 set strict use guidelines on the stadium, mandating that the facility only be used as stadium or for outdoor recreation activities. Under current law, the conditional lease is set to expire in 2038.

Originally christened the District of Columbia Stadium after its completion in 1961, the stadium was administratively renamed Robert F. Kennedy Memorial Stadium in January 1969 in honor of the late senator who had been assassinated several months earlier. The announcement was made by then Secretary of the Interior Stewart Udall in the last days of the Johnson Administration and was dedicated as such on June 7, 1969.

Since its opening in 1961, RFK Stadium has hosted numerous professional sports teams, athletic events, and concerts. The Washington Commanders, the Washington Senators, the Washington Nationals, and D.C. United have all called the stadium home. Other sporting events hosted at the stadium include FIFA World Cup matches, the Summer Olympics, and professional boxing title bouts. After the professional sports teams relocated to other facilities, RFK Stadium continued to host sporting events and concerts until 2019, when the stadium was finally closed to the public (Events DC, 2023a).

RFK Stadium encompasses 11.6 acres within the RFK Campus. The stadium is surrounded by open space consisting primarily of asphalt surface parking lots and landscaped areas. The site is clearly delineated by the streets that form its perimeter. 22nd Street SE is located to the west of the stadium; C Street NE and Independence Avenue SE are located to the north and south, respectively, before dovetailing to the east and becoming one roadway, East Capitol Street NE. The Whitney Young Memorial Bridge carries East Capitol Street NE over Kingman Lake and the Anacostia River to the east. The Fields at RFK Campus, a 27-acre outdoor sports complex, is located to the northeast of the stadium beyond C Street NE. The Festival Grounds within the RFK Campus serve as a large, open-air venue and are located southeast of Independence Avenue SE. To the west of the stadium beyond 22nd Street SE, there is the RFK Campus skate park and the DC Armory, which serves as a sporting and event venue (Events DC, 2023b; Events DC, 2023c).

The RFK Stadium is located within the easternmost portion of the original L'Enfant plan that has long been analyzed for potential development. In 2006, the National Capital Planning Commission (NCPC) drafted the *RFK Stadium Site Redevelopment Study* to explore potential ways to use the campus. The study followed prior NCPC plans, such as 1997's *Extending the Legacy: Planning America's Capital for the 21st Century* and 2001's *Memorials and Museums Master Plan*, which identified the RFK Stadium site as a potential location for memorials and other development. The study identified the RFK Campus as a key site for potential new commemorative works to serve as an eastern gateway to the rest of the city (NCPC, 2006).

ISSUES AND IMPACT TOPICS RETAINED FOR FURTHER ANALYSIS

The NPS identified potential issues and/or concerns for detailed analysis during the scoping process, along with participating agencies and stakeholders. These issues and concerns are briefly summarized below and have been included as the impact topics further discussed in "Affected Environment and Environmental Consequences" of this EA.

Figure 1. Vicinity Map



Potential for the project to impact above-ground cultural resources. The proposed project would demolish contributing features of the documented cultural landscapes and historic properties eligible for or within the National Register of Historic Places (NRHP). The direct Area of Potential Effects (APE) includes the stadium itself, which is potentially eligible for the NRHP. Historic resources within or adjacent to the indirect APE includes the Kingman Park Historic District, the Langston Golf Course Historic District, the Young, Brown, Phelps, and Spingarn Educational Campus Historic District, the Fort Circle Parks Historic District, the Capitol Hill Historic District, Eastern High School, Anne Archbold Hall, the Reservation 13 Archaeological Site, and the East Capital Street Car Barn. The project's potential impacts on historic properties are analyzed in detail under the Cultural Resources sections in this EA.

Potential for the project to impact air quality. The demolition of the RFK Stadium could alter air quality for the duration of the project. Emissions and fugitive dust would be generated from demolition equipment, as well as potentially harmful air pollutants resulting from the demolition itself. Although potential impacts would be temporary, the amount of air emissions generated from the project could be impactful. As such, air quality has been retained a topic for detailed analysis.

ISSUES AND IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS

The NPS has dismissed certain issues and concerns discussed during scoping from detailed analysis after determining that they would not be central to the project or of a critical nature. These issues and concerns are described in the sections below, as well as justification for their dismissal from further review.

Potential for the project to impact Natural Resources. As outlined by the natural resource policies of the 2006 NPS Management Policies, NPS is tasked with the preservation and protection of natural resources and systems, including vegetation, wildlife, special status species, water resources, and floodplains. The demolition of RFK Stadium will be limited largely to the stadium footprint; as the site was previously developed for the stadium, the demolition will not directly impact natural resources. The demolition would not require the removal of vegetation or habitat for wildlife. The NPS consulted with U.S. Fish and Wildlife Service (USFWS) to determine the potential presence of rare, threatened, or endangered species within the project vicinity. The USFWS Information for Planning and Consultation (IPaC) determined the federally endangered northern long-eared bat (*Myotis septentrionalis*), and the candidate species monarch butterfly (*Danaus plexippus*) may occur within the project area, as well as several migratory bird species (USFWS, 2023a) (**Appendix D**). However, habitat for these species, either for roosting, nesting, or foraging, does not exist within the project area. As such, this topic was dismissed from further analysis.

As the project area includes the vacant stadium and its immediate vicinity, there are no wetlands or other water resources present that would be directly impacted by demolition activities. The nearest bodies of water are Kingman Lake and the Anacostia River, located approximately 850 and 1,700 feet to the east of the study area, respectively. Project design will incorporate erosion and sediment control practices in order to prevent sediment from escaping the site; best management practices (BMPs), including a silt fence surround the project site, will reduce the potential for indirect impacts to water resources in the vicinity from sediments during construction. All preventative erosion and sediment control practices would comply with District regulations, including Section 438 of the Energy Independence and Security Act of 2007. Therefore, water resources were not carried forward for further analysis.

The 2006 NPS Management Policies established that NPS will protect the natural functions and associated resources of floodplains. Although there are portions of the 500-year floodplain in the vicinity of the project, as well as 100-year floodplain associated with Kingman Lake and the Anacostia River, the project area boundary is not located within the floodplain. Erosion and sediment controls would minimize any potential impacts to floodplains in the area; as such, floodplains was dismissed from further analysis.

Potential for the project to impact the human environment. Although the land that the stadium occupies is federally owned, the stadium was leased to the District during its past use. The professional

sports teams that once played at RFK Stadium have relocated to other venues, though events were still held at the stadium up until 2019. Currently, the stadium is vacant and is not open to the public; as such, there would be no impacts to visitor use and experience. In addition, removal of the vacant stadium will open the land for future development that could present more opportunities for visitor use and experience, such as a waterfront park, ball fields, memorials, museums, and/or mixed use development. Therefore, visitor use and experience was not advanced for further analysis.

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, directs federal agencies to identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority or low-income populations. RFK Stadium is located within Census Tract 68.04 in the District of Columbia. According to the U.S. Environmental Protection Agency (EPA)'s Environmental Justice screening and mapping tool (EPA, 2023a), Environmental Justice populations are within the vicinity of the study area, including greater percentages of minorities and unemployed individuals. However, the proposed demolition of the stadium would not disproportionately impact these communities when compared to non-Environmental Justice populations also in the vicinity of RFK Stadium. Environmental Justice was not retained for further analysis.

In 2019, a hazardous material survey was conducted at RFK Stadium and determined that asbestos-containing materials, lead-based paint, and other sources of hazardous or universal waste were present at the site (ECS, 2019). As a result of the survey, an abatement project specification report was completed to outline the management of hazardous and universal waste, including lead-based paint and asbestos-containing materials. In 2022, an asbestos and hazardous materials abatement plan was developed to further outline the proper removal of hazardous substances from the stadium during demolition. The plans provide contractors with guidance on the removal of these substances, including safety precautions and disposal procedures. The removal of hazardous materials will follow all federal, state, and local regulations and will be disposed of at approved waste facilities (Atmos Solutions, 2022). Permits for asbestos abatement and the removal of an underground fuel storage tank have been obtained from the District Department of Energy & Environment (DOEE) and the D.C. Department of Buildings (DOB), respectively. As protocols for the safe removal of hazardous materials would be established, hazardous waste was dismissed as a topic for further analysis.

The RFK Stadium demolition would require construction vehicles, equipment, and materials to be transported to and from the site during the project, potentially increasing the amount of traffic on the roadways surrounding the stadium. To this end, a traffic control plan (TCP) was developed in order to facilitate demolition vehicles accessing the site while minimizing traffic impacts. The TCP provides guidelines for the contractor to safely and efficiently manage both vehicular and pedestrian traffic for the duration of the project. Therefore, traffic and transportation were not retained as topics for further analysis.

Potential for the project to impact archaeological resources. No previous archaeological surveys have been conducted within the project's direct APE. Most of the stadium's southwest parking lot was included in an archival study for the proposed Northeast Boundary Swirl Facility, but no subsurface testing was conducted at this location (Taylor, 1984). Phase I subsurface testing was conducted south of the stadium site at the possible location of a nineteenth century smallpox hospital and cemetery. While two human femurs were recovered from fill deposits, no direct or intact evidence of the cemetery was revealed (Taylor, 1985).

The RFK Stadium site is located within a highly modified urban landscape (Wagner, 2009). While archaeological sites have been identified in the vicinity of the project area, the potential for unidentified archaeological resources is very low within the project's direct APE. Archaeological sites with pre-Contact period components identified south of RFK Stadium are located along what was the west bank of

the Anacostia River prior to the infilling of the Anacostia Flats. This landform would have been favorable to pre-Contact habitation. However, the majority of the RFK Stadium site is located within what were the Anacostia marshes, not an elevated landform, until infilling occurred in the early twentieth century. Geoarchaeological investigations conducted on the adjacent DC Armory property revealed that between 9 and 18 feet of fill has been deposited in this area (Wagner, 2009). Fill deposits on the RFK Stadium site are likely deeper given its location within the infilled Anacostia Flats. While buried archaeological resources may be present, demolition activities within the direct APE will not impact below the likely depths of fill. Undisturbed ground will not be impacted.

As there is limited potential for the presence of archeological resources within the direct APE, there would be *no adverse effect* on archeological resources. However, a plan would be developed for unanticipated archeological discoveries during demolition activities. The plan would include notification procedures to be followed, field recovery and documentation methods to be implemented, post-field recovery analyses to be conducted, and final documentation to be filed with the DC State Historic Preservation Office (SHPO).

ALTERNATIVES

This section of the EA describes the no action and the proposed action alternatives for the demolition of the RFK Stadium. The elements of these alternatives are described in detail in this Chapter. Impacts associated with each alternative are outlined in the Affected Environment and Environmental Consequences of this EA. In addition, several options associated with the proposed action were dismissed from further consideration. These are described in this chapter under “Alternatives Considered but Dismissed.”

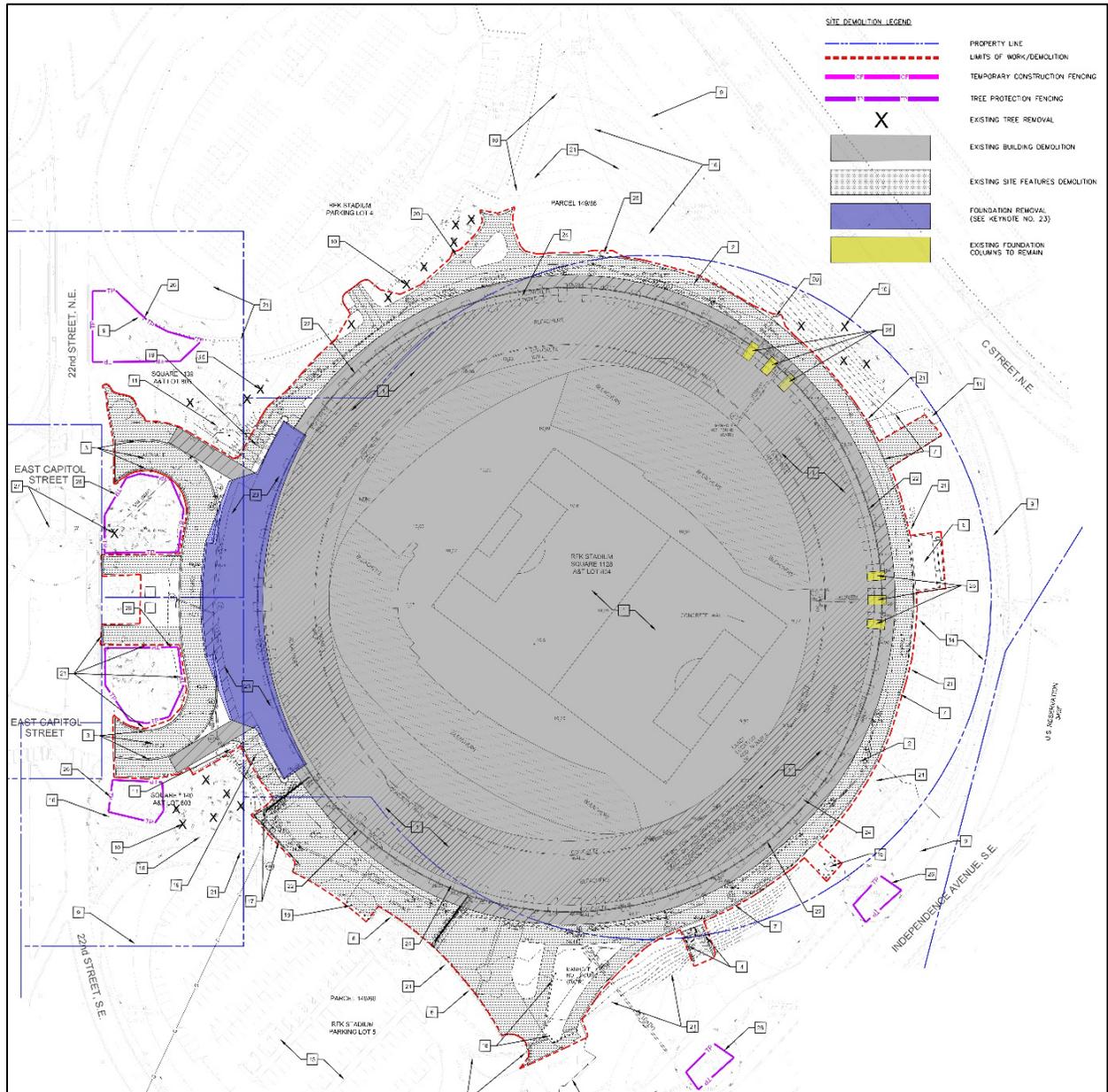
ALTERNATIVE A: NO ACTION

Under the no action alternative, the RFK Stadium would not be demolished. The project site would remain as it currently is. The RFK Stadium would continue to fall into disrepair.

ALTERNATIVE B: RFK DEMOLITION (NPS PREFERRED)

The proposed project would involve the NPS permitting the demolition of the RFK Stadium located at 2400 E Capitol St NE in Washington, DC, for which the land is owned by the federal government and administered by the NPS. The RFK Stadium demolition project consists of four phases: hazardous materials abatement; selective demolition of non-structural features including furniture, equipment, interior partition walls, doors, windows, flooring and signage; structural demolition; and back-filling and grading. The initial phase, already completed, included the removal of identified asbestos-containing materials and universal waste within the stadium. To prepare for demolition, selective materials have been removed including, but not limited to, furniture, equipment, interior non-load bearing partition walls, doors, windows, flooring, signage, and mechanical, plumbing, and electrical fixtures. Gas, sanitary sewer, water, and electrical lines have also been disconnected. Prior to the demolition of the structure, erosion and sediment controls will be implemented at the project site. Silt fencing will be installed along the proposed Limits of Disturbance (LOD) for the project (see **Figure 2**). Structural demolition will be accomplished by mechanical means. The steel structure will be deconstructed by lowering members to the ground piece-by-piece. This will be followed by crushing the concrete structure into smaller sections that can be lowered to the ground. Materials will be sorted and processed onsite for recycling and/or reuse. Demolition work will be sequenced in a radial manner, working within the existing structural column bays. The stadium structure will be removed to a minimum depth of 36 inches below finished grade. A small number of foundation columns will be left in place, some of which will remain in order to protect nearby storm drain systems. Demolition of exterior features within the project LOD will include the perimeter sidewalk, most of the asphalt loop drive at the stadium’s entrance, fencing, bollards, light poles, a retaining wall, and the removal of some trees and existing vegetation. The existing parking lots will remain. Following all demolition activities, the project LOD will be backfilled and graded to allow for site drainage and new vegetation will be planted.

Figure 2. RFK Stadium demolition plan (provided by Smoot, 2023)



MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potential adverse impacts to resources under the jurisdiction of the NPS or because of an NPS decision. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following mitigation measures will allow the NPS to meet its conservation mandates as required by the Organic Act (16 United States Code [USC] 1 et seq.) and as further detailed in NPS Management Policies, the National Historic Preservation Act, the Endangered Species Act (16 USC 1531 et seq.), and Executive Order 13112, as amended by Executive Order 13751 (December 8, 2016). The NPS would also implement the following to help ensure that protective measures are properly implemented and are achieving their intended results.

Cultural Resources

- Memorandum of Agreement (MOA) between all appropriate signatories as determined through consultation. Mitigation measures include the documentation of the RFK Stadium property following the Historic American Buildings Survey (HABS) standards, the development of a Historic Resource Study (HRS) for RFK Stadium, the creation of an interpretive display on the RFK Stadium site presenting its history and significance, oral histories, and access to memorabilia from the RFK Stadium by Events DC.
- A plan for unanticipated archeological discoveries during demolition activities. The plan would include notification procedures to be followed, field recovery and documentation methods to be implemented, post-field recovery analyses to be conducted, and final documentation to be filed with the DC State Historic Preservation Office (SHPO).

Air Quality

- Best management practices (BMPs) would be implemented during demolition activities, including, but not limited to, spraying water on exposed soils, covering open equipment for conveying materials, and minimizing vehicle and equipment idling.

ALTERNATIVES DISMISSED FROM FURTHER CONSIDERATION

The NPS considered alternative elements for the proposed demolition of the RFK Stadium that the NPS ultimately dismissed from further consideration. This included the following:

- Implosion: The project team considered the use of implosion as an alternative demolition scenario. This approach was deemed infeasible due to concerns of increased sound, dust, and vibration impacts to surrounding buildings, historic resources, and adjacent sub-surface infrastructure (Metro facilities, utilities, etc.). Also, the use of explosives within the District of Columbia requires a lengthy permit approval process that would not support the overall project schedule.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes current environmental conditions in and around the project area. The discussion is focused on resources that could potentially be affected by the implementation of the proposed project and provides a baseline for understanding the current condition of the resources. This section also includes an analysis of the environmental consequences, or “impacts,” of the No Action and Action Alternatives.

The Affected Environment description is followed by the Environmental Consequences analysis for each resource topic. The resource topics analyzed here correspond to the planning issues and concerns described in the Purpose and Need section of this EA.

In accordance with the Council on Environmental Quality (CEQ) regulations, the environmental consequences analysis includes the direct, indirect, and cumulative impacts potentially resulting from the proposed alternatives (40 CFR 1502.16). The intensity of the impacts is assessed in the context of the park’s purpose and significance, and any resource-specific context that may be applicable (40 CFR 1508.27). Where appropriate, mitigating measures for adverse impacts are described and their effect on the severity of the impact is noted. The methods used to assess impacts vary depending on the resource being considered but are generally based on a review of pertinent literature and park studies, information provided by on-site experts and other agencies, professional judgment, and park staff knowledge and insight.

This EA also considers cumulative impacts, namely “the impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions” (40 CFR 1508.1). Cumulative impacts have been addressed in this EA by resource and are considered for the no-action alternative and the proposed action. The cumulative impact analysis under each resource describes the impact of those ongoing and planned actions, plus the incremental impacts of the two alternatives (no action and action). The following projects are planned and/or ongoing and are considered as part of the cumulative impact analysis.

- Kingman and Heritage Islands Redevelopment Project - The purpose of this project is to develop and execute a master plan for comprehensive ecological restoration, conservation and management for the site. Kingman and Heritage Islands are 40 and 7 acres, respectively. Heritage Island is accessed via a footbridge from the RFK Stadium Parking Lot 6 and is surrounded by Kingman Lake. Adjacent to Heritage Island to its east, Kingman Island can be accessed via the island’s entrance on Benning Road and via a footbridge from Heritage Island. It is surrounded by Kingman Lake on the west and the Anacostia River on the east. Specific projects within the master plan would include: outdoor classrooms, pathways and boardwalks, way finding signage and viewsheds, and invasives removal, management and comprehensive ecological restoration planning.
- Langston Golf Course Rehabilitation – The purpose of this project is to address deferred maintenance, increase playability, and achieve financial stability for the operation of Langston Golf Course while highlighting the history and importance to the African American community and reestablishing it as an important, vibrant community resource to residents. Specific projects that are a part of the rehabilitation include: renovating the existing 18-hole golf course, constructing an 18-hole putting course, renovating the practice areas and driving range, building a new miniature golf course and renovating and expanding the clubhouse.

CULTURAL RESOURCES

Affected Environment

Historic properties were identified within the project's Area of Potential Effect (APE) (see **Figure 3**). As defined by 36 CFR 800.16(d), the APE represents "the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist."

These properties include those listed in or eligible for listing in the NRHP and/or the DC Inventory of Historic Sites (DC Inventory). Properties are considered eligible for listing if a formal determination of eligibility has been made or if they meet, or potentially meet, at least one of the four NRHP criteria for evaluation, as defined in 36 CFR § 60.4. **Figure 3** provides the boundaries of both the *direct* and *indirect* APE for the RFK Stadium demolition project and the historic properties listed below.

Historic properties that are located within or directly adjacent to the indirect and direct APEs include:

- **RFK Memorial Stadium:** Groundbreaking for RFK Stadium began in 1960 and its construction was completed in 1961. Designed by Texas-based architect, George Leighton Dahl, RFK Stadium was one of the first in the country designed to host both baseball and football games. It was part of a wave of multi-use stadiums constructed across the country after World War II. With a nearly perfectly circular plan, the front side of the stadium slopes down forming a "V" shape. Its facade creates the perception of waving lines, as if the stadium were in motion (Scott et al., 2020). The stadium's large size and prominent location along the Anacostia River makes it visible from a large part of the surrounding area. Dahl's utilitarian design for the stadium lacked architectural detail or ornamentation and did not attempt to align with the architecture of the surrounding neighborhoods or with that of nearby government buildings (Mellon, 2022). However, RFK Stadium retains its overall integrity as a potentially historic property. While there have been many alterations made to the stadium and surrounding site, these have been minor and have not impacted the original massing or form of the stadium as originally constructed (Mellon, 2022). Alterations were mostly made to its interior and included changes to the seating layout, service areas, and mechanical systems. Architectural details, while limited, were generally not impacted by these alterations.
- **Anacostia Park:** The area immediately surrounding RFK Stadium is located within Anacostia Park (Section F), part of the NPS National Capital Parks – East (NACE). The stadium structure itself is not included in the park boundary. The park currently encompasses more than 1,200 acres on the east and west sides of the Anacostia River spanning from South Capitol Street SE to New York Avenue NE. Anacostia Park was established as an urban park in 1919 and came under the jurisdiction of the NPS in 1933 under the authority of the Capper-Cramton Act of 1930. A formal NRHP nomination is currently in progress for Anacostia Park; however, it has been officially determined eligible for listing in the NRHP as a historic district by the DC SHPO (Torkelson, 2021). A draft NRHP nomination prepared in 2010 suggested a period of significance from 1906 to 1949 for the park (Venno and Calvit, 2010); however, a recent cultural landscape inventory recommended an expanded period of significance from pre-1668 to 1976 (Torkelson, 2021). This encompasses the park's archaeological significance, the importance of its creation as parkland under the Army Corps of Engineers, New Deal-era improvements, the segregation and desegregation of recreational facilities, temporary World War II facilities, and its Bicentennial-era redesign. While it is not known whether the current NRHP nomination will recommend that RFK Stadium is a contributing resource to Anacostia Park, the 2010 draft NRHP nomination and 2021 cultural landscape inventory considered the stadium to be non-contributing and the view of RFK Stadium was not considered a contributing feature of the park (Venno and Calvit, 2010; Torkelson, 2021).

- DC Armory: The DC Armory building is adjacent to the RFK Stadium property to the southwest at 2001 East Capitol Street SE. It opened in 1941 as the headquarters, armory, and training facility for the DC National Guard and currently functions as a sports and entertainment venue (Events DC, 2023d). Designed by the city's municipal architect Nathan C. Wyeth, the DC Armory could be considered an example of the "stripped classical" style, commonly used for government buildings beginning in the 1930s (U.S. General Services Administration, 2017), with Art Deco and Modern elements. This large, symmetrical building is clad in limestone with its main central section covered by a commanding, curved shed roof (Scott and Lee, 1993). The Armory's main façade features five vertical strips of glass block windows over five entrance openings and a Moderne-style, incised eagle design at the center of the frieze (Scott and Lee, 1993) The DC Armory's eligibility for listing in the NRHP or DC Inventory has not yet been formally determined; however, it is considered potentially eligible for the purposes of this assessment.
- Kingman Park Historic District: The Kingman Park Historic District is located to the northwest of RFK Stadium and is listed in the NRHP and the DC Inventory (Williams, 2018). The district is part of a larger area that includes the Kingman Park and Langston neighborhoods and is located at the extreme eastern end of Capitol Hill. The southern boundary of the district generally follows Oklahoma Avenue NE and Benning Road NE between 20th Street NE and the Anacostia River. The western boundary generally falls between 19th and 21st Streets NE and extends from C Street NE to Maryland Avenue NE. Maryland Avenue NE and M Street NE form the northern boundary of the district. The Langston Golf Course and the northern portion of Kingman Island comprise the northeastern portion of the district. Also included in the Kingman Park Historic District are the Langston Terrace Dwellings and the Young, Browne, Phelps, and Spingarn Educational Campus and are discussed in more detail below. The district is significant as it was a neighborhood marketed and built for African Americans at the height of racial segregation during the late 1920s through 1940s. The neighborhood was one of the few areas of the city without racially restrictive housing covenants. The Kingman Park Historic District includes a variety of property types such as single-family rowhouses, small apartment buildings and flats, a public housing complex, commercial buildings, and school buildings. A wide variety of architectural styles are represented by these properties, the most prevalent being Craftsman, Colonial, Tudor Revival, Colonial Revival, Art Deco, and Modern or proto-Modern (Williams, 2018). The period of significance for the Kingman Park Historic District is 1928-1960.
- Langston Golf Course Historic District: The Langston Golf Course Historic District is located entirely within the boundaries of the Kingman Park Historic District. The 18-hole golf course is focused on Kingman Lake and was constructed in 1939 by the Civilian Conservation Corps and Works Progress Administration as a recreational area for African Americans. It is listed in the NRHP and DC Inventory for its significant role in desegregating golfing and other recreation areas in the District (Cole, 1989). The period of significance for the Langston Golf Course is 1939-1941. It is a NPS-owned public golf course managed under the NACE.
- The Langston Terrace Dwellings: The Langston Terrace Dwellings are adjacent to the northwest portion of the indirect APE, located on the north side of Benning Road NE. The garden apartment buildings are included in the NRHP and DC Inventory as they were the first federally funded public housing complex built in in DC for limited-income African Americans (Leiner, 1986). Constructed between 1933 and 1937, the complex is an example of an early Public Works Administration project. The Langston Terrace Dwellings complex was designed in the International Style and features a terra-cotta frieze above its entrance that portrays Black labor and migration from rural fields to urban industrialization.
- Young, Browne, Phelps, and Spingarn Educational Campus Historic District: Listed in both the NRHP and the DC Inventory, the Young, Browne, Phelps, and Spingarn Educational Campus Historic District is located within the Kingman Park Historic District and is adjacent to the

northwest portion of the indirect APE. The district includes a complex of four public school buildings constructed specifically for African American students from 1930 to 1952. These include Spingarn Senior High School, Browne Junior High School, Charles Young Elementary School, and Phelps Vocational High School. All four of the schools were designed in a Colonial Revival style (Williams, 2018).

- The Spingarn Senior High School: The Spingarn Senior High School is one of the four buildings in the Young, Brown, Phelps, Spingarn Educational Campus Historic District described above.
- The Fort Circle Parks Historic District: Located east of the indirect APE across the Anacostia River, the Fort Circle Parks Historic District is approximately 1,300 incongruous acres surrounding the central part of the city and includes 68 Civil War forts and batteries, over 20 miles of trenches, and other associated resources. Fort Circle Parks Historic District is listed in the NRHP and the DC Inventory (Dillon, 1972). The closest fort locations to the RFK Stadium project's indirect APE are Fort Chaplin (now Fort Chaplin Park) on the south side of East Capitol Street SE and Fort Mahan (now Fort Mahan Park) on the north side of Benning Road NE. Fort Chaplin Park is located on Reservation 500 and Fort Mahan Park is located on Reservation 475.
- The Capitol Hill Historic District: Located to the west of the indirect APE, the Capitol Hill Historic District is listed in the NRHP and the DC Inventory as it is one of the oldest neighborhoods in DC. The period of significance for the Capitol Hill Historic District extends from 1791, when Washington was chosen as the site for the federal government, to 1945, the end of World War II. Predominant architectural styles represented in the Capitol Hill Historic District rowhouses and townhouses include Federal, Queen Anne, Italianate, Second Empire, and Richardsonian Romanesque (Dayton and Trieschmann, 2010).
- Eastern High School: Eastern High School is located west of RFK Stadium and is currently nominated for listing in the NRHP as it is a prime example of the Collegiate Gothic Revival style (Purcell, 2023). Constructed in 1923, the school's period of significance continues to 1938.
- Anne Archbold Hall: Anne Archibald Hall is located within the indirect APE to the southwest of the stadium located within a parcel of land known as Reservation 13. It is listed in the DC Inventory (Metzger, 2003). Built in 1932 as part of the larger Gallinger Municipal Hospital complex (later, DC General Hospital), Anne Archbold Hall is an example of Neoclassical architecture. It originally served as the Gallinger Hospital Nurses Residence, when Gallinger Hospital was a leading teaching institution for the education of nurses. The period of significance for Archbold Hall spans from its date of construction in 1932 to 1972 when the final class of nurses graduated.
- Reservation 13 Archaeological Site: This archaeological site is located within Reservation 13, to the southwest of the stadium. It is listed in the DC Inventory as it yielded significant information regarding the pre-European habitation of the area by the Nacotchank people (DC Preservation League, 2023).
- The East Capitol Street Car Barn: Also known as the Metropolitan Railroad Company Car Bar, the East Capitol Street Car Barn is located north of the indirect APE and is listed in the NRHP and DC Inventory. The building was constructed in 1896 in the Romanesque Revival style as a car barn, repair shop, and administrative offices for the Metropolitan Railroad Company (Brown, 1973). Its period of significance extends from 1896 to 1962 when the last streetcar operated in the District. In 2004, the Car Barn property was rehabilitated into condominium housing.
- Kingman and Heritage Islands: Kingman Island, also known as Burnham Barrier, and Heritage Island are located in the Anacostia River, east of the RFK Stadium property. These man-made islands were built from dredged river material in the early twentieth century, as part of the large reclamation project to fill the mudflats along the river, also known as the Anacostia Flats. Kingman and Heritage Islands are not listed in the NRHP or the DC Inventory, and their historical significance has not been formally evaluated; however, they are considered potentially eligible for listing.

Figure 3. Direct and indirect APE and historic properties



One culturally significant viewshed, as documented in the Federal Urban Design Element of the *Comprehensive Plan for the National Capital* (NCPC, 2016), was also included as part of the indirect APE. The *Plan* considers the East Capitol Street viewshed to be a “preeminent” viewshed, defined as a critical view to and from the city’s monumental core that contributes to the “visual importance/hierarchy of nationally symbolic public buildings and civic spaces” (NCPC, 2016). The East Capitol Street viewshed extends from the U.S. Capitol east to Southern Avenue SE, the District boundary, and passes directly over RFK Stadium (see **Figure 3**). East Capitol Street acts as a gateway into the city and this viewshed creates a “visual link between the monumental core and the surrounding established neighborhoods” (NCPC, 2016).

Impact Assessment Methodology

Potential impacts to historic properties were analyzed in consideration of regulations implementing Section 106 of the National Historic Preservation Act and guidelines stated within the Secretary’s Standards (NPS 1995b). The analysis of the potential impacts of the project on historic properties focused on whether the proposed undertaking would “...alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association” (36 CFR 800.5(a)(1)).

Impacts of Alternative A: No Action

Under the No Action Alternative, the stadium would not be demolished; however, hazardous material remediation would still take place. RFK Stadium, which is currently under review for eligibility in the NRHP, would remain in disrepair. Cultural resources that are located within or adjacent to the indirect APE would not be impacted.

Impacts of Alternative B: RFK Stadium Demolition (NPS Preferred)

RFK Stadium is eligible for listing in the NRHP; therefore, its demolition would result in an adverse effect, as defined in 36 CFR § 800.5. As it is not possible to avoid or minimize the adverse effect on the historic property, mitigation measures will be documented in a Memorandum of Agreement (MOA) between all appropriate signatories as determined through consultation. Mitigation measures include the documentation of the RFK Stadium property following the Historic American Buildings Survey (HABS) standards, the development of a Historic Resource Study (HRS) for RFK Stadium, the creation of an interpretive display on the RFK Stadium site presenting its history and significance, oral histories, and access to memorabilia from the RFK Stadium by Events DC.

Demolition activities would have temporary effects on the views from historic properties within or adjacent to the project’s APE including the DC Armory, Anacostia Park, Kingman Park Historic District, Langston Golf Course Historic District, the Young, Brown, Phelps, and Spingarn Educational Campus Historic District, Spingarn Senior High School, Langston Terrace Dwellings, Anne Archbold Hall, Eastern High School, East Capitol Street Car Barn, Capitol Hill Historic District, and Fort Circle Parks Historic District. Although this would be short-term, demolition activities would not permanently alter any of the characteristics that qualify these resources for inclusion in the NRHP. Therefore, there would be no adverse effect on these historic properties.

Demolition activities could also have temporary effects on historic resources from construction noise and vibration. The main source of noise and vibration during demolition would result from building materials being brought down to the ground. To lessen the amount of vibration and the extent of its effects, crushed concrete would be placed on the ground surface prior to demolition. Noise and vibration monitoring would be consistently conducted during demolition activities. Remote-controlled monitoring units are

currently located on the RFK Stadium site collecting baseline data, which would be used to gauge the effectiveness of the demolition phase environmental controls. During demolition, the monitoring units would be positioned so that data is being collected at the active work area, as well as at the site perimeter between the work area and adjacent structures. If noise or vibration levels approach pre-determined limits, the demolition contractor would be notified in real-time so that means and methods can be reviewed and adjusted, if needed. Further, the demolition of RFK Stadium would result in no adverse effect on archaeological resources.

Cumulative Impacts

Current and future projects identified for the cumulative impact analysis, including the Kingman and Heritage Islands Redevelopment Project and the Langston Golf Course Rehabilitation, have the potential to affect historic resources. As part of these projects, the responsible agencies would have or would continue to consult with DC SHPO, and consulting parties to minimize the adverse effects in accordance with Section 106 of the NHPA. The proposed demolition of the RFK Stadium would result in an adverse effect to historic resources. A MOA has been developed to mitigate the adverse effect. Overall, the RFK Stadium Demolition has the potential to add a small adverse incremental impact to the potential adverse impacts of other projects and actions, resulting in what would remain a relatively minor adverse cumulative impact to historic resources. There may also be an adverse cumulative impact under the no action alternative if the continued unuse of RFK Stadium diminishes the significance and integrity of the Langston Golf Course Historic District or the Anacostia Park.

AIR QUALITY

Affected Environment

The U.S. Environmental Protection Agency (EPA) regulates air emissions and pollutants under the authority of the Clean Air Act (42 U.S.C. §7401 et seq.). The EPA has set National Ambient Air Quality Standards (NAAQS) for the following criteria pollutants: ozone (O₃), particulate matter (PM_{2.5} and PM₁₀), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), and lead (Pb). If any NAAQS are exceeded in a geographic area, the area is considered a non-attainment area for that pollutant (EPA 2023b).

The Metropolitan Washington Council of Governments (MWCOG) designated the DC-MD-VA Region as a marginal nonattainment area for O₃ (area has a design value of 0.071 ppm up to, but not including 0.081 ppm) under the 2015 8-hour standard (MWCOG, 2020). From 2001-2003, the region had an ozone 8-hour design value of 0.099 ppb, which was designated as moderate nonattainment for the now-revoked 1997 NAAQS. The 2008 8-hour ozone (now revoked) was designated as marginal maintenance with a design value of 0.081 ppb from 2008-2010. On August 15, 2019, the region was redesignated by the EPA regarding the 2008 8-hr ozone standard from marginal nonattainment to attainment maintenance (EPA, 2021). While the area still has ozone issues, precursor emissions such as volatile organic compounds, nitrogen oxides and particulate matter are reducing, therefore ozone concentrations are slowly declining. The District's Ambient Air Quality Trends Reports illustrates these trends (DOEE, 2020).

The Clean Air Act established that federal agencies are not to negatively interfere with NAAQS under the General Conformity rule. Under the General Conformity rule, federal agencies must work to ensure that proposed actions conform to the State Implementation Plan (SIP). In order to comply with the rule, federal actions must not cause or contribute to new NAAQS violations, worsen existing violations, or delay NAAQS attainment. To conform to the SIP, emissions generated during and as a result of a federal action must remain below *the de minimis* threshold of 100 tons per year. Should the *de minimis* threshold be exceeded, a formal conformity determination would be required (EPA, 2022a; EPA, 2022b).

Executive Order 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*, directs federal agencies to review their actions and work towards confronting the

climate crisis. The Council on Environmental Quality (CEQ) issued interim guidance for federal agencies to assist with analyzing the effects of greenhouse gas (GHG) emissions and climate change.

MWCOG established regional GHG emission reduction goals of 10 percent below business-as-usual projections by 2012 (back down to 2005 levels); 20 percent below 2005 levels by 2020; 50 percent by 2030; and 80 percent by 2050. Metropolitan Washington met both the 2012 and 2020 goals. As a result of the 2020 pandemic, emissions from buildings and transportation saw a greater reduction in greenhouse gas emissions that was anticipated (MWCOG, 2023). GHG emissions decreased by 24 percent in the region between 2005 and 2020 (MWCOG, 2023b).

Impact Assessment Methodology

The environmental impacts on local and regional air quality conditions near a proposed action are determined based on increases in regulated pollutant emissions compared to existing conditions and ambient air quality. This analysis focuses on the potential air quality impacts associated with emissions from demolition and from the use of heavy equipment.

Impact of Alternative A: No Action

Under the No Action Alternative, the stadium would not be demolished; however, hazardous material remediation would still take place; vehicles and equipment associated with remediation activities would contribute air emissions for the duration of the work. However, this would not likely exceed *de minimis* thresholds for any of the NAAQS.

Impacts of Alternative B: RFK Stadium Demolition (NPS Preferred)

Demolition of RFK Stadium would require the use of heavy equipment, and tractor trailer and tandem-axle dump trucks coming to the site on average 20 times per day, which would contribute to air emissions. Best management practices (BMPs) would be implemented during demolition activities, including, but not limited to, spraying water on exposed soils, covering open equipment for conveying materials, and minimizing vehicle and equipment idling. Demolition activities are not expected to exceed *de minimis* thresholds for NAAQS and would not require a formal conformity determination.

Furthermore, monitoring units have been installed at the project site to monitor the amount of PM₁₀ entering the atmosphere as a result of the demolition. Once RFK Stadium has been removed, the site would not generate air emissions until it is developed further; even then, the future use of the site would likely not generate the level of air emissions that visitors to the stadium had previously.

Demolition of RFK Stadium would contribute a small level of GHG emissions, which could contribute to climate change. However, climate change is a long-term event and the demolition of RFK Stadium would only be temporary. Once the demolition is complete no additional impacts would occur.

Cumulative Impacts

Current and future projects identified for the cumulative impact analysis, including the Kingman and Heritage Island Redevelopment and the Langston Golf Course Rehabilitation, are not expected to have the potential to affect air quality. The proposed demolition of the RFK Stadium is not expected to exceed *de minimus* thresholds. Demolition activities would result in fugitive dust and emissions from construction equipment, but these impacts would be minimized through dust suppression and use of modern, well-maintained construction equipment; and monitoring units have been installed to monitor the amount of PM₁₀ entering the atmosphere as a result of the demolition. As such, there would be no cumulative impacts to air quality under the no action or the action alternatives.

CONSULTATION AND COORDINATION

The NPS involved the public during the NEPA process to provide an opportunity for the public to comment on the proposed project. Consultation and coordination with federal and District of Columbia agencies and other interested parties was also conducted to identify issues and/or concerns related to park resources. This section provides a brief summary of the public involvement and agency consultation and coordination that occurred during planning.

PUBLIC INVOLVEMENT

Events DC hosts a project website (<https://eventsdc.com/venue/rfk-stadium>) and a newsletter which provides updates to the community. Events DC also shares updates and solicits community input at RFK Campus Quarterly Meeting and ANC meetings. In addition, this EA has been made available for public review and any substantive comments received will be addressed.

AGENCY CONSULTATION AND COORDINATION

Section 106 of the National Historic Preservation Act

Pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800), the NPS initiated consultations with the DC SHPO, in a letter dated June 6, 2023. The letter briefly described the project and invited comments. On July 14, 2023, the DC SHPO provided preliminary comments. NPS also notified the ACHP on the adverse effects determination on August 22, 2023 for which the ACHP responded that they will participate in the Section 106 process on August 23, 2023. Correspondence can be found in **Appendix A**.

After initiating consultation, the NPS assessed the potential effects that the demolition of RFK Stadium would have to cultural resources in an Assessment of Effects (AOE) Report that was submitted to ACHP, and the DC SHPO. The Assessment of Effects Report can be found in **Appendix B**.

The NPS held two Section 106 consulting parties' meetings, which occurred on June 6, 2023, and July 27, 2023. Consulting parties reached a consensus that the project will result in an adverse effect on historic properties. The DC SHPO concurred with the determination on July 14, 2023. A MOA between all appropriate signatories, as determined through consultation, has been developed to mitigate the adverse effect. Mitigation measures to be implemented include the documentation of the RFK Stadium property following the Historic American Buildings Survey (HABS) standards, the development of a Historic Resource Study (HRS) for RFK Stadium, the creation of an interpretive display on the RFK Stadium site presenting its history and significance, oral histories, and access to memorabilia from the RFK Stadium by Events DC. A draft of the MOA can be found in **Appendix C**.

Tribal Consultation

Tribal consultation initiation letters were sent to the Cherokee Nation, Pamunkey Indian Tribe, Upper Mattaponi Indian Tribe, Rappahannock Tribe, Nansemond Indian Nation, Chickahominy Indian Tribe, Chickahominy Tribe Easter Division, Monacan Indian Nation, Catawba Nation, Delaware Nation, Absentee Shawnee Tribe of Indians of Oklahoma, and the Shawnee Tribe on August 29, 2023. The Shawnee Tribe responded on August 30, 2023 stating the proposed project is outside Tribe's area of interest. The Monacan Indian Nation responded on September 28, 2023 stating the proposed project is outside their ancestral territory. The correspondence is in **Appendix A**.

Section 7 of the Endangered Species Act

The NPS obtained an official species list using the USFWS IPaC System on August 29, 2023 that determined the federally endangered northern long-eared bat (*Myotis septentrionalis*), and the candidate species monarch butterfly (*Danaus plexippus*) may occur within the project area, as well as several migratory bird species (USFWS, 2023a). However, habitat for these species, either for roosting, nesting, or foraging, does not exist within the project area. The IPaC species list is included in **Appendix D**.

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