

STAFF RECOMMENDATION

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NCPC File No. MP060



ARMED FORCES RETIREMENT HOME FINAL MASTER PLAN

Rock Creek Church Road and Upshur Street, NW
Washington, D.C.

Submitted by the Armed Forces Retirement Home

July 3, 2008

Abstract

The Armed Forces Retirement Home (AFRH) in Washington, D.C. has submitted a final campus master plan for Commission review and approval. In addition to proposed development for AFRH use, AFRH proposes additional mixed-use development on campus land including residential, office, research and development, institutional, medical, retail, and hotel uses by leasing portions of the federally owned site to private developers. The submission proposes land uses, building massing, street layouts, and parking supplies for four zones within the campus. The master plan development is anticipated to occur over a timeframe of 15-20 years.

Commission Action Requested by Applicant

Approval of final master plan and transportation management plan pursuant to 40 U.S.C. § 8722(b)(1) and (d).

Executive Director's Recommendation

The Commission:

Approves the National Environmental Policy Act Environmental Impact Statement Alternative 3A as presented and analyzed in the adopted Final Environmental Impact Statement, dated November 2007, for the Armed Forces Retirement Home (AFRH) final master plan, and further;

Notes that the Environmental Impact Statement for the master plan concludes that the proposed development will generate traffic impacts to the surrounding road network that can only be mitigated by improving the capacity of the surrounding road network, and that;

The District of Columbia Department of Transportation has stated that it will not permit the Armed Forces Retirement Home to improve capacity of the surrounding road network because doing so would not be in accordance with the District elements of the Comprehensive Plan and other proposed plans and policies, and;

The District of Columbia Department of Transportation and the Armed Forces Retirement Home have not been able to reach accord at this time on the number of parking spaces that would both meet the anticipated demand and place an acceptable burden on the surrounding road network, and **(AFRH and the District reached agreement after the publication of this report, see below*)**;

Neither the District of Columbia nor the Armed Forces Retirement Home are able to produce the analysis necessary to fully substantiate their positions, and;

The site is not currently zoned and therefore no parking requirements under District zoning are directly applicable, the District is currently reviewing its parking standards under the rewrite of the Zoning Regulations, and may develop new parking standards, and;

The District of Columbia does not yet have plans in place or resources committed to increase transit service along the corridors serving the Armed Forces Retirement Home, and therefore;

The applicant's proposed parking supply for the office and medical office uses has been adjusted by substituting NCPC's adopted Comprehensive Plan parking ratios for the employee parking proposed for these uses (1 space for every 4 employees), allowing a 25% bonus for medical office uses plus visitor parking;

Approves the submitted final master plan and transportation management plan, with the exception of Zone C and subject to conditions outlined regarding Zone C below, as shown on NCPC Map File No. 12.10(05.14)-42479, and with the following changes to the proposed parking supply (based on 179,228 GSF of office and 290,650 GSF of medical office proposed by the Home, a .9 gross to net leasable square feet conversion factor, and 230 net leasable square feet per person average per GSA) and transit service. ***The amount of parking shown below is subject to change if the square footage of medical office space increases or decreases. The approved parking ratio for medical office space is 2.94 parking spaces per 1000 gross square feet, as outlined in the letter agreement from the District Department of Transportation and District of Columbia Office of Planning dated July 7, 2008.**

1. Parking for Phase One Development in Zone A is approved at 2,741 spaces. These spaces can be shared among all of the proposed Phase One uses at the discretion of the Armed Forces Retirement Home.

2. The total parking supply for all phases of Zone A is approved at 5,155 spaces. This number of parking spaces is subject to increase or decrease by approval of NCPC after consultation between all parties regarding the following factors:

To decrease parking:

a. The District of Columbia develops and implements premium transit service (express, limited stop bus or rail service) in the Irving Street corridor designed in part to replace the AFRH proposed shuttle service and to serve neighboring users. Funding for the service will be provided in part by the AFRH development, but will also come from other sources including other users.

b. The District of Columbia completes a cumulative traffic analysis of the surrounding road network demonstrating the network capacity by taking into account all proposed surrounding developments, including those at Catholic University, the Washington Hospital Center, and the McMillan Reservoir project.

To increase parking:

- a. Nearby planned developments are permitted a greater parking supply per square foot or the parties agree that medical office market conditions support an increase in the parking supply.
- b. The Armed Forces Retirement Home demonstrates that it has fully explored opportunities for shared parking among the site's uses.

To increase or decrease parking:

- a. The District of Columbia completes a study of the medical office parking requirements and parking ratios for the overall area.
- b. All parties consider citywide travel mode splits and trip generation numbers.

In any case, parking numbers cannot exceed the limit of study in the Environmental Impact Statement for the project.

3. The appropriate parking supply for Zone B is subject to adjustment using the above factors when specific development proposals are available. The proposed parking supply for Zone B is 880 spaces.

4. Approval of parking for Zone C is deferred pending resolution of the approved development plan for Zone C.

5. The improved shuttle service plan submitted June 19, 2008 is approved in lieu of the service outlined in the master plan. Service characteristics in the plan are subject to negotiation between the Armed Forces Retirement Home and the District of Columbia; changes to service characteristics must fall within the overall service levels accounted for in the proposed funding for the plan.

And the following additional changes agreed upon by the Home and the District of Columbia:

1. Shifting of 26,608 square feet of retail from Scale Gate Road entrances to Irving Street;
2. Eliminating the widening of Scale Gate Road ramps and instead installing two traffic signals at the developer's expense;
3. Reconfiguring crosswalks on Irving Street;
4. Realigning the geometry of entrances along Irving Street to work with entrances to Washington Hospital Center;
5. Working collaboratively with area medical institutions on shared shuttle service.
6. Redirecting some of the funds dedicated to shuttle services to premium transit when the District brings such service on line, and;
7. Providing active uses at building corners along Irving Street at proposed cross streets.

Notes that the Armed Forces Retirement Home does not intend to develop Zone C for at least 15 years, and that;

The Armed Forces Retirement Home has stated that its purpose in developing Zone C is to provide an income stream for capital and operating expenses for the Home, and that:

The staffs of the National Capital Planning Commission, the District of Columbia, and the National Park Service have determined through the CapitalSpace study that the neighborhoods

surrounding the Armed Forces Retirement Home have a need for additional public park space, and therefore the Commission:

Defers action on the proposed development of Zone C, as shown on NCPC Map File No. 12.10(05.14)-42479, and approves Zones A and B contingent upon AFRH's commitment to explore the potential to develop Zone C as a public park that provides an income stream to the Armed Forces Retirement Home as follows:

AFRH will actively participate in a two-year planning process with NCPC staff, the District of Columbia Office of Planning, the National Park Service, and the community **beginning in first quarter fiscal year 2009** to determine the feasibility of allowing Zone C to be used as a publicly accessible park while providing an income stream acceptable to the Home. The process will include:

1. AFRH commitment to participate in regular meetings and workshops with stakeholders, including NCPC, NPS, the District of Columbia, and community groups;
2. Identification by stakeholders on an appropriate value and/or income stream to compensate for park use (agreed upon values must be supported by real estate and financial analyses);
3. Identification by stakeholders on acceptable options for conveying site control of Zone C, and responsibilities for the management, programming and maintenance of Zone C as a publicly accessible park (including long-term lease, transfer of development rights, and other options);
4. Identification by stakeholders on a range of appropriate park uses and conceptual designs for Zone C;
5. Identification of potential resources and funding options to address site control, capital improvements, management and maintenance; and
6. Completion of any additional environmental and historic documentation;
7. Agreement among stakeholders on a timeline, with milestones, to secure resources and funding and complete appropriate agreements beyond the two year process;
8. AFRH and NCPC staff report to the Commission every six months on progress toward these goals.

* * *

PROJECT DESCRIPTION

The Armed Forces Retirement Home (AFRH) has submitted to the Commission a final master plan for review.

The proposal provides conceptual design and planning for development of 138 acres of its existing 272-acre AFRH campus, which presently supports more than 100 buildings and ancillary structures. The Home currently serves slightly more than 1,200 military veterans with support features such as health-related operations and services, private rooms, a bank, chapels, a convenience store, a post office, laundry facilities, a barber shop and beauty salon, dining rooms, a golf course, fishing ponds, and 24-hour security and staff.

The AFRH was established in 1851 and is located in northwest Washington, D.C. The site is bounded by North Capitol Street to the east, Harewood Road to the northeast, Rock Creek Church Road to the northwest, Park Place to the west, and Irving Street to the south. The site occupies one

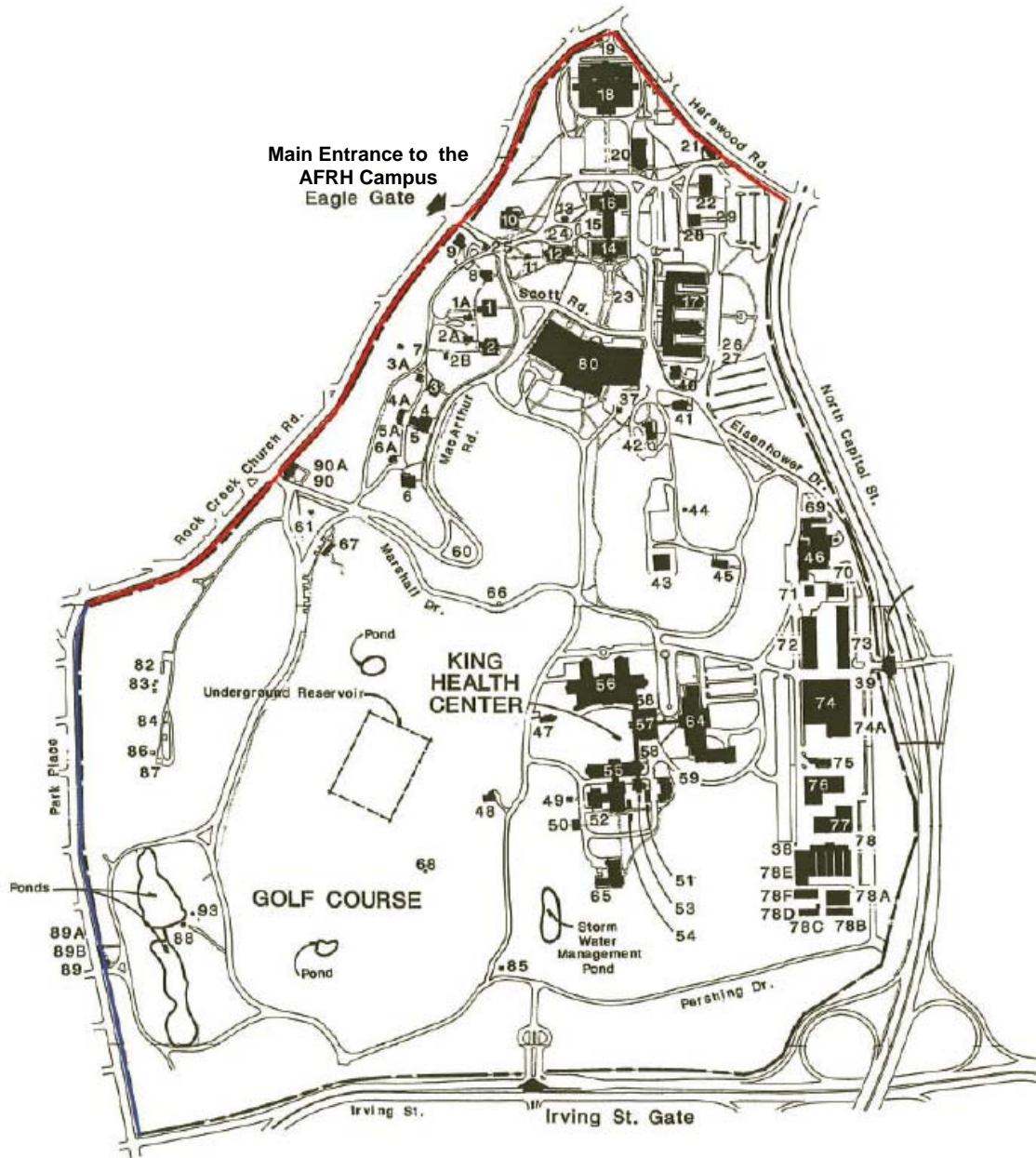
of the highest elevations within the District of Columbia and provides panoramic views of the District. The general terrain of the site slopes downward from north to south. Southern portions of the campus include both wooded and open areas, surrounding a nine-hole golf course. Many of the existing AFRH buildings range in height from 25 feet to 50 feet in height. At the King Health Center two prominent structures (Bldgs. 55 & 56) stand over 125 feet in height.

The AFRH is an independent federal agency dependant upon a trust fund rather than annual appropriations to finance its operations. In 2002 Congress authorized AFRH to sell, lease or otherwise dispose of real property excess to its needs for development to supplement the trust fund and ensure the financial stability of AFRH for future generations of retired military personnel. The submission includes in its purpose the need to create a funding source for the home.



EXISTING AERIAL VIEW OF ARMED FORCES RETIREMENT HOME

The existing AFRH can be separated into four functional areas: 1.) the northern part of the campus, 2.) the support and utility area, 3.) the King Health Center, and 4.) the recreational areas. The primary AFRH retirement home and administrative facilities are located in the northern section of the site. The AFRH campus also includes a National Monument, a National Historic Landmark District, and a National Register Historic District and a number of buildings deemed to be contributing to the historical character of the site. The National Trust for Historic Preservation has completed renovating the Lincoln Cottage and the Administration Building (Bldg. 10) for a visitor center related to touring the Lincoln Cottage and grounds.



EXISTING ARMED FORCES RETIREMENT HOME SITE PLAN AND MAIN SITE FEATURES

BUILDINGS SCHEDULE

Contributing

- 1 Governor's House
- 1A Garage
- 2 House
- 2A Garage
- 2B Tool Shed
- 3 House
- 3A Garage
- 4 House
- 4A Garage
- 5 House
- 5A Garage
- 6 House
- 6A Garage
- 8 Admissions Building
- 9 Eagle Gate House
- 10 Administration Building
- 11 Bandstand

Non-Contributing

- 7 Substation
- 17 Sheridan Building
- 23 Flag Staff
- 25 Eagle Gate Guardhouse
- 26 Tunnel Exhaust Fan
- 27 Manhole "C" (Converter)
- 29 A/C Cooling Tower
- 30 Tank - M48
- 31 Jet - F8s
- 37 A/C Cooling Tower (Scott Mess)
- 39 Flammable Storage
- 39 Guardhouse
- 43 Auto Craft Shop
- 44 Substation
- 51 Carport
- 54 Substation
- 56 LaGarde Building

Contributing

- 12 Anderson Cottage
- 13 Water Tower
- 14 Sherman South
- 15 Sherman Annex
- 16 Sherman North
- 18 Grant Building
- 19 North Gate Lodge
- 20 Stanley Hall
- 21 Cemetery Gate House
- 22 Security Building
- 24 Gazebo
- 40 Building 40
- 41 House
- 42 Rose Chapel
- 45 House
- 46 Heat Plant
- 47 House

Non-Contributing

- 61 Rest Room
- 64 Pipes Building
- 65 Ignatia Guest House
- 66 Shelter
- 67 Golf Clubhouse
- 68 Golf Course Shelter
- 69 Storage
- 70 Support Directorate Headquarters
- 71 Main Substation
- 72 Shop Building #2
- 73 Shop Building #3
- 74 Warehouse
- 74A Central Cold Storage
- 75 Flammable Gas and Storage Building
- 76 Garage
- 77 Grounds Maintenance
- 78 Greenhouse

✦ Also known as the "Lincoln Cottage"

BUILDING SCHEDULE (CONTINUED)

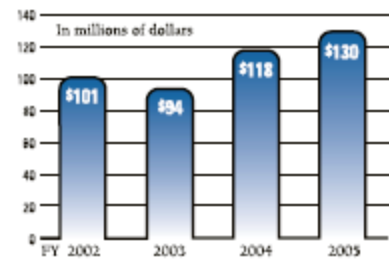
Contributing	Non-Contributing
49 Bandstand	76A Greenhouse
50 Carport	76B Greenhouse
52 Barnes Building	76C Greenhouse
53 Hostess House	76D Greenhouse Storage
55 Forwood Building	76E Greenhouse
57 Mess Hall	76F Greenhouse
58 Mess Hall Corridors	80 Scott Building
59 King Hall	80A Cooling Tower (Mess Hall)
60 Scott Statue	80B Loading Dock
89 Park Road Gate House	80C Sturry Building
89B Storage Shed	82 Tool Shed-Cage #1
90 Randolph Street Gate House	83 Tool Shed-Cage #2
90A Garage	84 Rest Room
Fence G	85 Shelter
Wall & Fence	86 Vending Machine Shed
	87 Tool Shed-Cage #3
	88 Shelter
	89A Garage
	93 Feed Shack
	Unknown
	28 North Converter Room
	48 Rest Room

The final master plan, as defined by AFRH, is a mixed-use development of the AFRH site with a potential range of uses encompassing residential, office, research and development, institutional, medical, retail, and hotel development. The plan also allows for new AFRH facilities as needed in the future. Although the specific uses for new AFRH buildings are not fully described, the character, massing, and locations of the proposed structures are provided.

Most of the master plan sub-area zones A, B, and C will not be constructed by AFRH but by a private developer and/or other institutional entities including possible government agencies that would lease space. Development within Zones A, B and C will generate

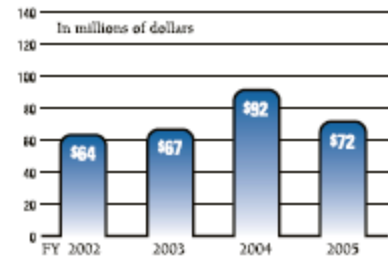
revenue for AFRH from lease of the property, which will be deposited into the AFRH Trust Fund and used to continue the operations of the retirement community and ensure the ongoing provision of services to retired military personnel. In 2004, the Trust Fund for AFRH had a balance of \$118 million after a one-time infusion \$22 million from the sale of a portion of the site to Catholic University. Over the past years, the Trust Fund and incoming revenue has varied as indicated in the charts, with additional saving measures implemented by the AFRH. In late 2006, AFRH completed a detailed facilities assessment that identified \$366 million in deferred maintenance and required capital improvements needing funding over the next 10 years. This includes items such as new roofs, new HVAC equipment for existing buildings. Finally, AFRH notes an increased amount of operations and maintenance funding needed to maintain aged infrastructure (see Appendix B). The Trust Fund balance stood at approximately \$159 million at the end of FY 2007.

AFRH Trust Fund Balance



After a decline in FY 2003, the Trust Fund balance has been steadily increasing.

Revenue



Source: AFRH Annual Performance and Accountability Report, Fiscal Year 2005

The final master plan proposes new construction based on the land’s existing character, access limitations, physical constraints, and integration with the current development of the campus. The major objectives identified by AFRH include:

- Optimize development of AFRH while maintaining the historic character of the site and retaining significant existing open space;
- Provide development uses that are complementary to AFRH;
- Ensure that AFRH facilities are conveniently located for its residents and that there is room for AFRH capital improvements on the north campus;
- Provide for the security of AFRH residents;
- Encourage the rehabilitation and reuse of historic buildings;

- Avoid, minimize, and mitigate adverse effects on the Historic District resources that contribute to the character of the Home;
- Retain and enhance the form and function of the existing landscape elements,
- Integrate the landscape and the built form, and
- Respect the character of the adjacent communities and integrate the new development into the city fabric

The final plan establishes four areas where potential new development would occur. Each master plan zone maintains a design framework centered on form based guidelines (see Appendix A) that control the physical design within the zone. A form based standard is a development tool that places primary emphasis on the general physical form of the built environment with the end goal of producing a specific type of “place”. The base principle of a form based tenet is similar to the use of “form based coding” and establishes that the design is focused on the street level appearance of structures and design characteristics. Simple graphic prescriptions for building height, how a building is placed on site, and building elements (such as location of windows, doors, etc.) are used as standards. Land-use is not ignored, but regulated using broad parameters that can better respond to market economics, while also prohibiting undesirable uses.

Historically in the United States, many towns regulated development through systems that were primarily form based. Two well-known examples are Chicago and Old Town Alexandria in Virginia. More recently, form based regulations have been used most frequently in developing new planned communities, but are increasing in popularity for existing cities, particularly those that are encouraging infill redevelopment or are concerned about protecting and enhancing the existing character of a community. The compatibility of this approach is very adaptable to historic environments.

Background

Previous Commission actions involving the AFRH campus include:

- By action dated July 2, 1970, the Commission approved The U.S. Soldier’s Home, District of Columbia—Revised Master Plan, as shown on NCPC Map File No. 12.10(05.12)-25994. for a resident population of 5,200 with the recommendations that:
 - A minimum buffer width of 120 feet should be established around the site
 - No land fill operations on the east tract should occur
 - Parking should be integrated with new building construction or provided in structures
 - Parking areas south of the Scott Building should be deleted
 - The areas south of the chapel should be utilized as an open space area
 - Existing tree cover on the site should be retained as much as possible
 - Use of narrow “U” shaped courts should be avoided

Over the succeeding years, limited major modifications to the AFRH master plan were submitted to the Commission until February 2, 2006. At that time, the AFRH proposed a draft master plan that reflected many new issues for mixed-use campus development.

The Commission provided the following comments on the draft master plan and requested the AFRH:

- Reduce the total amount of proposed development. The Commission did not support the applicant's proposal to develop as much as 9 million gross square feet of new space on the AFRH campus. The maximum total square footage of new development should not exceed the moderate range of new buildable space set forth in the master plan's draft environmental impact statement.
- Ensure that building heights are compatible with the character and scale of the surrounding area; with the topography and other natural conditions of the site itself; with the historic assets on the site protecting historic view sheds; and recognizing surrounding residential patterns. Revise maximum building heights in Zone 1B (now the AFRH Zone) so that they do not exceed the height of the Sheridan Building.
- Provide within the plan for Zones 3 and 4 (now Zone A) a well-defined publicly accessible recreational open space component that reflects the input from NCPC staff and members of the local community.
- Revise proposed building heights in Zones 5 and 6 (now Zone B and C) to bring them into conformance with surrounding zoning and development patterns, and increase proposed buffers to protect existing forested areas. The four- and eight-story development proposed would radically transform these zones and affect the setting of the National Historic Landmark to the north, the approach to that landmark area, and its viewsheds.
- Develop a Transportation Management Plan through consultation with NCPC staff that corresponds to the master plan, outlines the proposed parking supply, and analyzes associated traffic patterns and impacts. Include provisions for improved access to transit services. Submit the Transportation Management Plan as part of the final master plan.
- Incorporate into the master planning process a strategy and schedule for removing the temporary trailers currently housing charter school(s) on the campus, and develop related plans to relocate the schools into permanent space if AFRH intends to permanently house these schools on the campus.
- Seek General Services Administration assistance to establish and implement an agreement with the District of Columbia outlining actions and responsibilities for building code review, compliance and permitting related to constructing the proposed private development on federal land. The applicant must inform the Commission of the resolution of the permitting process no later than submission of the final master plan for Commission action.
- Undergo further consultation with NCPC staff and develop an interim submission following selection of a development team that consists of a revised draft master plan to respond to the above comments and to incorporate changes prior to submission of the final master plan.
- Encourage continuous consultation with the community, Advisory Neighborhood Commissions and especially the three elected Councilmembers from Wards 1, 4 and 5 whose wards are affected by this proposal in all areas of this project.

- Request that the applicant provide a financial analysis of the operating costs and needs of AFRH.

Applicant's Response to Commission issues

The AFRH has revised the plan as a final submission and has responded to the Commission's directions through the following:

- The total amount of proposed development is reduced in size. The final AFRH master plan specifies 6.1 million gross square feet of development that includes the uses of institutional, residential, office, retail, hotel, and assisted living space.
- The building heights of all development have been revised as requested. The AFRH Zone development does not exceed the height of 85 feet, while other zones vary from 40 feet to up to 120 feet.
- Zone A (private development) now includes a public accessible park and other recreation space totaling approximately 23 acres.
- Zone B, fronting on Irving Street at the southwest portion of the 272-acre campus, is the location of residential or office/institutional uses. Directly across Irving Street to the south is the Washington Hospital Center. Zone C is now proposed for development of low scale (40 feet) residential use and open space area only. The plan has changed so that these residences would no longer continue the city street grid into the campus and are buffered with landscape and maintained green space as agreed upon under the Section 106 process.
- A Transportation Management Plan, as part of the final master plan, has been submitted and updated as of June 23, 2008 (see pages 34 to 42).
- Existing tenant lessees (includes Charter schools) operating on AFRH property now are located within permanent structures on the AFRH Zone, or are being removed from the campus.
- On August 2, 2007 the AFRH Chief Operating Officer, The Director of the District of Columbia Office of Planning, and the NCPC General Counsel signed a Memorandum of Understanding and Statement of Land Use Review Process for Development of the Armed Forces Retirement Home-Washington Site. This document specifies the unique review circumstances involving federal land subject to private development for traditionally non-federal use. The agreement addresses implementing zoning and building code review processes for the private development construction (see attachment).
- In November 2007 the AFRH and GSA provided both the public, District of Columbia Office of Planning, and NCPC staff an interim submission of the final master plan to review and comment upon.
- The AFRH and GSA have demonstrated in the submission continued consultation and contact with the public and local neighborhoods about the final master plan. AFRH reached out to all Advisory Neighborhood Commissions in the area and to other community organizations interested in the planning development and historic preservation of the campus. AFRH worked with the DC State Historic Preservation Office (DCSHPO) and Advisory Council on Historic Preservation (ACHP) to identify consulting parties to

participate in the Section 106 process and met during March 2006 through December of 2007 with the signatories and consulting parties.

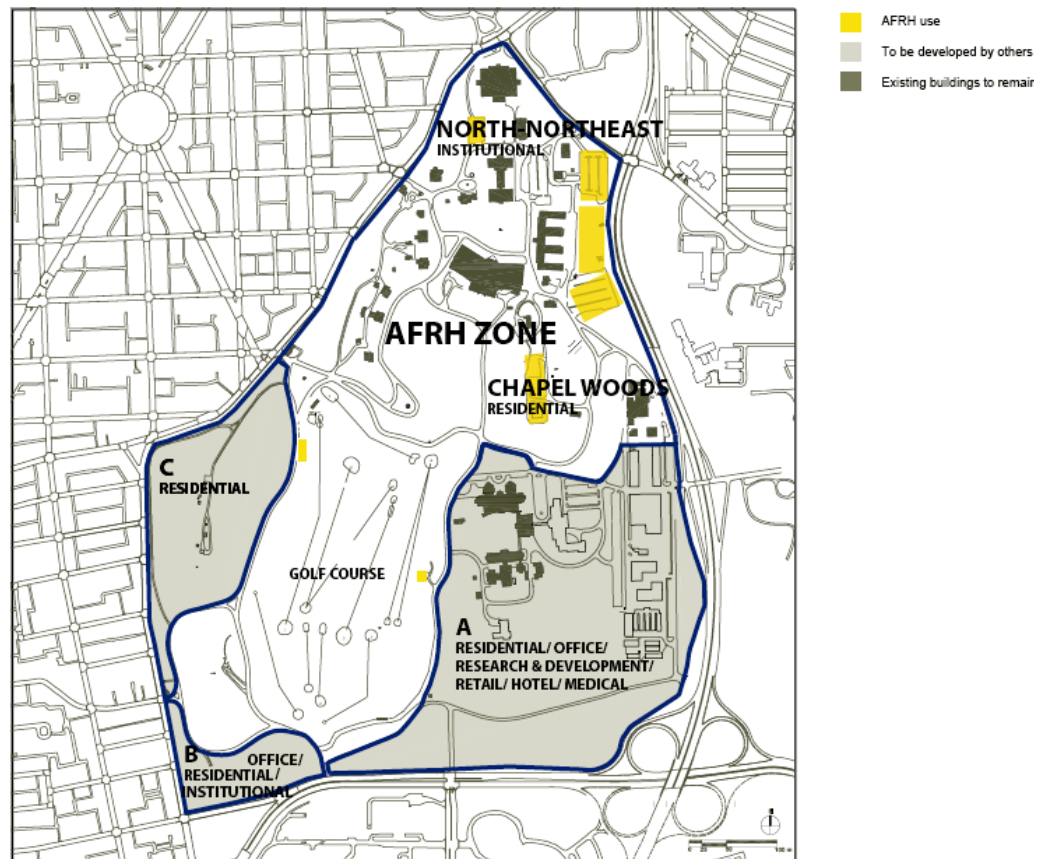
- The AFRH had briefed the Commission of its financial status in August 2007 and also has submitted an evaluation to address the operating costs and needs of the AFRH and Zone A revenue generation (see Appendix B, page 61).
- In February 2008 the AFRH and GSA met with the District Office of Planning to review and revise the master plan Zone A area to address concerns expressed by an Office of Planning letter of January 2008 (see attached). Additionally, NCPC staff sponsored a public meeting within the community on April 14, 2008, to hear community comment on the final master plan.

Applicant's Proposal

Planning features

The master plan identifies four development zones. The development zones are planning unit parcels that could be offered incrementally to developers based on market demand with an implementation horizon of at least 20 years for full build-out.

Development in Zones A, B, and C will be undertaken by other than the AFRH to create physical building designs under the direction of the master plan. The remainder of the site will not be developed further except for the planned needs of the AFRH as specified by the master plan. The secure perimeter for the retirement community would be relocated to exclude the leased land. Two golf course holes from the AFRH Zone and small new facilities for recreational uses, such as the golf club house (Building 67), would be relocated within the secured perimeter.



PROPOSED LAND USE IN THE FINAL MASTER PLAN

AFRH Zone

Development in the AFRH Zone will be primarily for AFRH's use. This area involves the central area encompassing the golf course, Lincoln Cottage, the Scott Building, Sheridan Building, and smaller buildings and open space. The location for any new AFRH managed construction will be in this area and will be in keeping with the historic campus/institutional character of the zone. The

Chapel Woods area is the planned location of an AFRH low-density residential use that will maintain the existing wooded character of the area. The area would involve approximately 350,000 gross square feet of new development in the central north and northeast land area.

Areas of the AFRH Zone that are not operated by AFRH include the operation of the Lincoln Cottage and a visitor center; both open to the public. Those facilities are managed by the National Historic Trust by agreement with the AFRH. Also, there are two historic buildings within this area that are not needed for AFRH operations – the Grant Building and the Security Building. The AFRH will encourage their adaptive re-use by other entities in accordance with the master plan.

The 18-acre AFRH low density residential area (Chapel Woods) is a heavily wooded, natural setting area within the AFRH Zone. The maximum allowable space for new development in this area is 42,000 gross square feet. A variety of small-scale housing types is envisioned to be constructed in this area to cater to the diverse needs of the AFRH veteran population. Housing types may be a combination of townhouse and or duplex housing and would include 42 parking spaces total.

Zone A

Development Zone A (77 acres) would support the most intensive development on the AFRH property. New development is anticipated to have an urban character with a building typology that is sympathetic to the character and scale of existing AFRH contributing buildings and landscape features of the current campus. The maximum allowable gross area for new development in Zone A would be 4.3 million square feet. It is anticipated by the developer that approximately 6,415 parking space would be located in this area both in above and below ground parking garages.

Because of the feasible access points to adjacent major vehicular roads, advantageous topographical changes—and its proximity to Catholic University and existing Washington Hospital Center areas—Zone A is envisioned to provide a location for major mixed-use development. Uses in these zones could potentially include research and development, office, residential, hotel, ancillary retail, and educational uses. The AFRH has selected a developer for Zone A and this area will be constructed starting in the next year through approximately 2015 or longer.

Zone B

At the western corner of AFRH campus and across the street from Park View neighborhood, Zone B (8 acres) is a series of small to medium scale mixed-use building areas. The maximum allowable gross area for new development in Zone B would be 880,000 square feet. The land use for this zone would be planned for residential with minor ancillary retail on the ground floor of buildings fronting on Park Place and Irving Street. Institutional uses might also be possible should expanded interest and market conditions suggest such a potential. Parking would be established in below grade parking within the buildings supplying approximately 880 spaces.

Zone C

The final master plan proposes that development in Zone C maintains the residential character of the nearby Park View neighborhood with new development being similar in scale and character. The area encompasses 26 acres. The parcel as a whole would be limited to a maximum allowable gross area of 550,000 square feet for new development and 550 parking spaces.

In general, Zone C would be targeted for residential use, but the introduction of open space for the AFRH related to the operation of the Lincoln Cottage and its historic setting would be a possible factor for further planning in the future, with strong interest by the National Park Service to see the area maintained as open space. Such a circumstance would find the AFRH amenable to leasing the property to the National Park Service if adequate terms for operation of the area would compensate the AFRH when the Home is ready to lease that area.

AFRH would consider forgoing development of Zone C if a financial arrangement suitable to the Home could be reached. The AFRH would send a letter to the District of Columbia Office of Planning and to the National Park Service indicating that AFRH is willing to initiate discussion of sale or lease of the Zone C property for use as public open space.

Form based Standards

For each development zone, the submission includes form-based control standards that define the primary use patterns, open space, streets and streetscapes, access, parking, and built form (building heights, massing form, set back requirements). Each zone is defined with the specific requirements presented as examples in appendix A.

The development standards establish basic requirements. These form based standards do not contain a regulating plan but includes instructions and standards for developers to follow when they prepare a regulating plan for their project parcel (e.g. maximum block dimensions, street types, building types, open space accessibility, and sidewalk widths.) in conformance with potential zoning that will be established on the property by the District of Columbia Office of Zoning. A specific parcel developer will prepare final project regulating plans for review and code compliance. A developer will submit his or her regulating plan for approval through the District of Columbia building review process.

The importance of form based standards has been demonstrated in urban planning throughout the country indicating they can regulate development at the scale of an individual building or lot, encouraging independent development by multiple property owners. With separate or multiple parcel project areas, establishing streetscape variety and architectural interest is encouraged by the standards. All streets within all Zones will remain private or federal roads.

In the context of any federal construction in the AFRH Zone, the form based standards will be utilized as criteria for applicant design development and will serve in the capacity as measures of compliance for the required NCPC project submission review. The standards establish building limit lines, building height, street element configurations, and conform to the federal Height of Buildings Act.

Plan Federal Employee Level

The submission indicates an employee population base for the AFRH of approximately 298 employees and approximately 1,200 member residents as of December 2007. No change in employee level is projected. The resident population may go to 1,400 in the future.

Transportation Management

The final plan includes a transportation management plan (TMP). AFRH requires all developers to prepare TMP information for implementation of the master plan. The TMP information specifies transportation management strategies such as carpool/vanpool incentives, shuttles to and from transit facilities, and transit incentives. Further details of the TMP for Zone A are presented on pages 34 to 42.

AFRH is in proximity to three mass transit stations on the Washington Metropolitan Area Transit Authority's Metrorail lines. On the Green line, the Georgia Avenue – Petworth Metrorail Station (0.75 miles from the site); on the Red line, the Brookland-CUA Metrorail Station (1.5 miles from the site) and the Fort Totten Metrorail Station (3 miles from the site). In addition, five Metrobus routes serve the area surrounding the AFRH and there is a bus stop at the main gate at the corner of Rock Creek Church Road and Upshur Street. The AFRH Zone TMP component is discussed on page 42.

Sustainable Development

Sustainable development is action "...to meet the needs of the present without compromising the ability of future generations to meet their own needs," as expressed by the World Commission on Environment and Development in 1987. This common reference is used by the building and design professions as design, construction, operations, and maintenance practices that meet the needs of current proposals without compromising resources for future generations.

The following strategies are specified in the AFRH master plan that will strive to enhance the overall design, natural environment, and quality of life of the community:

- **Mixed use development:** A balance of uses with jobsites and housing, and neighborhood-serving retail, which will provide the opportunity of walking to the stores or to-and-from work for residents and visitors.
- **Clustered development:** Proposed development will cluster buildings to limit the impact on topographical, hydrological, and ecological networks, while providing functional open spaces for the use of residents and visitors.
- **Open space network:** New development will minimize automobile dependency and improve connectivity to the vicinity transit system through a comprehensive bicycle and pedestrian network. The network, consisting of designated bikeways, sidewalks, parks, paths, and improved pedestrian crossings at bordering roads, and will invite the public into the Zone A development and allows connections to neighborhoods.
- **Adaptive reuse:** The restoration and adaptive reuse of existing historic buildings conserves energy, preserves history, and eliminates the need for replacement buildings.

- **Sustainable forestry:** Trees that are removed due to construction or disease will be considered for a re-use that implements sustainable source, processing and milling methods. In the program, trees are part of a lifecycle project system with the opportunity to bring trees back to the site as millwork or building materials.

- **Stormwater and habitat conservation:** The development's landscape in the central open space will be a functioning water management and recreational open space with water quality systems promoting a habitat for native trees and shrubs.
- **Site reclamation:** Recovery of the site's natural topography, hydrology, vegetation and restoration of water runoff is sought in the development.
- **Native plants:** The use of native plant species and water-efficient landscaping (where historically appropriate) limits the need of intensive land and water quality impacting activities.
- **Green roofs:** New development is encouraged to use green roof construction. Green roofs provide amenity views for building users, reduce heat (by adding thermal mass and thermal resistance value), reduce cooling (evaporative cooling) loads on buildings, reduce the urban heat island effect, increase the life span of the roof, reduces stormwater runoff, filter pollutants and carbon out of the air, and filter pollutants out of rainwater.
- **Viewsheds:** The maintenance and enhancement of viewsheds preserves qualitative attributes of the AFRH and promotes local interest in the site.
- **Optimized energy performance:** 15 to 20 percent energy savings are identified by the development for Zone A over ASHRAE 90.1 2000. This includes water efficiency, natural ventilation, and improved indoor air quality for buildings to substantially reduce inefficiencies while providing the additional benefits of reducing operating cost.

LEED® for Neighborhood Development (LEED-ND) is a pilot program being developed by the U.S. Green Building Council (USGBC), emphasizing smart growth principles and practices for residential and commercial development rather than for individual buildings. The Zone A development has been accepted as part of the LEED-ND pilot program, and participation is encouraged for all development on the AFRH. This participation will benefit the project in the following ways:

- The USGBC will provide advice to the AFRH so to make the development more sustainable.
- The AFRH will be able to exchange practices and lessons learned with other pilot program participants.
- The AFRH will help to refine the LEED rating system, ensuring that future LEED-certification adopts practices of this pilot program and dedicates itself to creating not just better more sustainable buildings but better more sustainable neighborhoods.

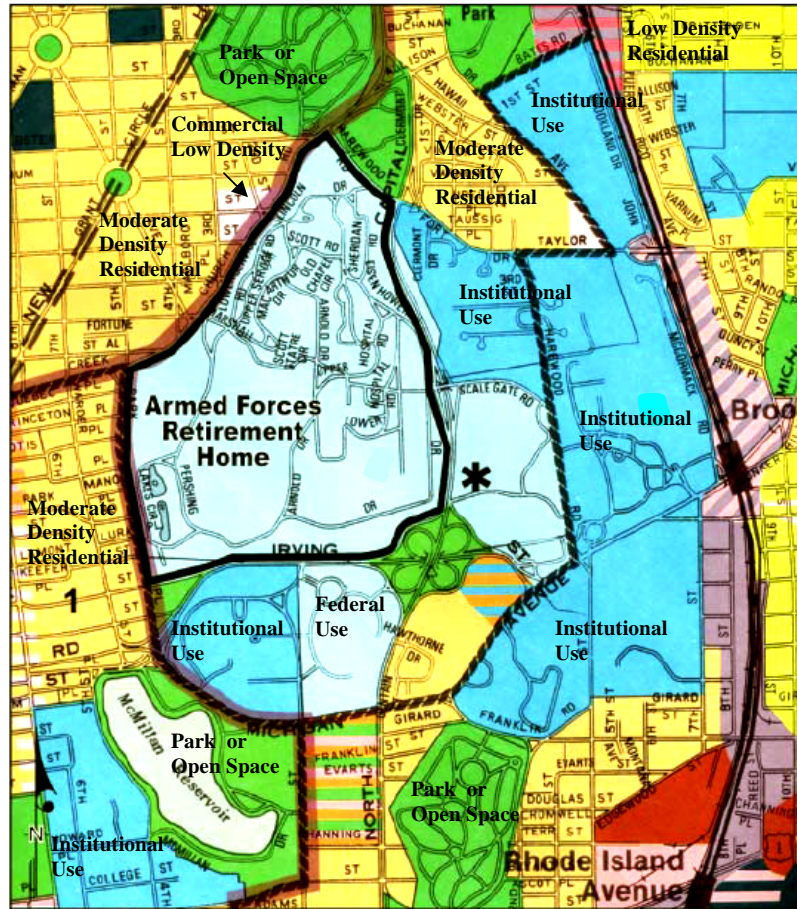
Under the new LEED-ND Pilot Program, it is anticipated that the Zone A development will be achieving a Gold rating for the overall neighborhood design. The approach to LEED certification for the development of Zone A includes:

- **Residential Buildings:** All new residential buildings over 3 stories will achieve LEED Certified rating under the LEED for New Construction (LEED-NC) Version 2.2 rating system.
- **Commercial Buildings:** All new commercial buildings will achieve LEED Silver rating under the LEED for New Construction (LEED-NC) Version 2.2 rating system.
- **Historic Buildings:** All historic buildings undergoing major renovation will achieve LEED Certified rating under the LEED for New Construction (LEED-NC).

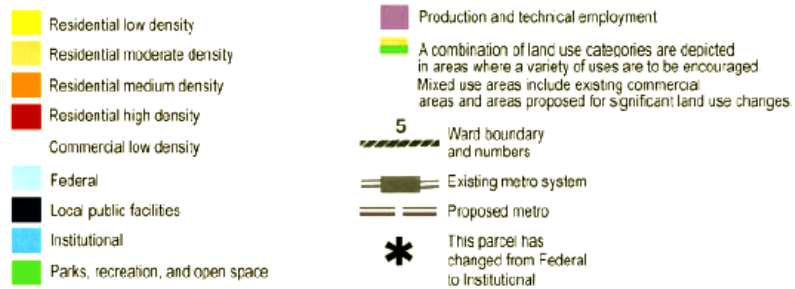
Urban Design Context

AFRH is located in a mixed residential/institutional area, approximately one-half mile east of the Georgia Avenue Corridor and directly west of North Capitol Street where it intersects Irving Street, NW. Commercial facilities in this area are limited but include: grocery, liquor, hardware, and clothing stores, beauty salons, and restaurants. The site is located in Advisory Neighborhood Commission 5C.

According to the District of Columbia Generalized Land Use Map, the AFRH campus is characterized as “federal,” meaning that the land and facilities onsite are occupied by the federal government (DC Office of Planning, 2002). Land uses directly adjacent to the AFRH are residential, institutional (medical, and education facilities), and commercial retail. The District of Columbia Generalized Land Use Map shows the areas west of the site as moderate density residential. This term is defined as row houses and garden apartments and some low density housing. The map shows the area south of the site is institutional and federal uses. The area designated as federal east of North Capitol Street has recently been changed to institutional. This change is noted in the graphic shown above.



Source: District of Columbia Office of Planning, January 2002.



DISTRICT OF COLUMBIA LAND USE MAP

Institutional land is land and facilities occupied by colleges, universities, hospitals, religious institutions, and other similar facilities. The Washington Hospital Center and the Department of Veterans Affairs Hospital are located to the south, across from the AFRH entrance at Irving Street. East of the present AFRH campus is the location of Catholic University and The Basilica of the Shrine of the Immaculate Conception. Located north of the AFRH are the Soldiers’ and Airmen’s Home National Cemetery and the Rock Creek Church Cemetery, both categorized Parks and Open Space.

COORDINATION

The AFRH initiated consultation with NCPC staff concerning the revised master plan in 2004 and early 2005, with the assistance of the General Services Administration (GSA). In its overall efforts, the AFRH design team has maintained communications with many stakeholders in the planning initiative and has conducted several community meetings. AFRH planners have also communicated with staff of the District of Columbia Office of Planning, the District of Columbia State Historic Preservation Office, and the District of Columbia Department of Transportation regarding the master plan.

Additional coordination was undertaken by NCPC staff with the above District of Columbia agencies. Moreover, the NCPC staff participated on the Community Planning Committee established by AFRH, which reviewed issues of the plan as it developed in 2006 and 2007.

Other meetings involving the AFRH have been undertaken. Members of the public participated in an open meeting on the Draft EIS for the master plan on June 22, 2005. Specific listing of public meetings and other coordination is identified as follows:

DATE	MEETING	LOCATION
10-05-2005	Section 106 Committee	AFRH-W
10-05-2005	Planning Committee	AFRH-W
10-05-2005	United Neighborhood Coalition	Park View Recreation Center
10-11-2005	ANC 1-A	
10-19-2005	Section 106 Committee	DC Office of Planning
10-19-2005	Planning Committee	AFRH
10-22-2005	Community	St. Paul's Episcopal Church
10-24-2005	Community	St. Gabriel's Church
11-02-2005	Section 106 Committee	NCPC Offices
11-02-2005	Planning Committee	AFRH-W
11-03-2005	Community	1-26-2006 Historic Preservation Board
12-03-2005	Public Tour of AFRH	2-28-2006 Federation of Citizens Associations
12-07-2005	Section 106 Committee	4-4-2006 United Neighborhood Coalition
12-07-2005	Planning Committee	4-6-2006 Committee of 100
12-13-2005	Open House	4-22-2006 Section 106 Consulting Parties
		6-20-2006 Committee of 100 Site Tour
		8-2-2006 United Neighborhood Coalition
		9-11-2006 Military Coalition
		10-4-2006 Section 106 Consulting Parties
		10-28-2006 Ward 5 Economic Forum
		11-14-2006 ANC 4C
		11-15-2006 DCBIA Development Committee
		4-2-2007 Military Coalition
		4-4-2007 United Neighborhood Coalition
		4-10-2007 ANC 4C
		4-24-2007 Federation of Citizens Associations
		5-01-2007 Section 106 Consulting Parties
		5-21-2007 ANC 1A Planning and Zoning Committee
		6-20-2007 Section 106 Consulting Parties
		7-27-2007 Section 106 Consulting Parties
		8-8-2007 Section 106 Consulting Parties
		8-13-2007 Section 106 Signators
		8-22-2007 Section 106 Consulting Parties
		9-11-2007 Section 106 Consulting Parties
		9-25-2007 Section 106 Consulting Parties
		10-26-2007 Section 106 Signators
		11-13-2007 ANC 4C
		12-5-2007 Section 106 Consulting Parties

Advertisements for community meetings and other public events appeared in two varied publicly available publications, The DC North and the Washington Post. Dates of the publicly advertised announcements included October 13, October 20, November 2 and November 24, in 2005. Other meeting have also been announced and advertised by ANCs

and the GSA in 2006 and 2007. These meetings are noted in the chart at the right.

Finally, the NCPC staff has received numerous individual comments to the Commission about the plan, which have been reviewed and considered in the staff's deliberation of the final master plan submission. See the report attachments on the most recent issues sent to the Commission. Additionally, NCPC staff hosted a public community meeting about the master plan on April 14, 2008 that was attended by approximately 60 residents of the local area.

Coordinating Committee Meeting

The Coordinating Committee reviewed this item at its meeting on April 9, and June 18, 2008, and forwarded the proposal to the Commission with the statement that the submission was coordinated with the General Services Administration, Washington Metropolitan Area Transportation Authority, and the National Park Service. NCPC, the District of Columbia Office of Planning and the District Department of Transportation noted unresolved transportation issues. The District of Columbia Department of Transportation (DDOT), as of June 13 and 23, 2008, remains concerned about traffic effects from the proposed master plan in the context of future transit service and parking. The expressed concern is the amount of single occupancy vehicle parking for the Zone A development and the following additional points:

- DDOT will require new signals at both ramp locations on Scale Gate Road, paid for by developer and controlled by DDOT
- DDOT will not permit a second southbound ramp from North Capitol Street.
- All stacking and queuing from the AFRH property will need to occur on AFRH property, not on ramps or Scale Gate Road.
- An additional westbound lane on Irving Street will not be accepted. Development must manage traffic generation to be accommodated within existing network.
- All new intersections on Irving must provide pedestrian crosswalks on all approaches.
- East and West access points along Irving must be coordinated with Washington Hospital Center and located to provide symmetrical intersections.

The recent revisions to the TMP (see page 34) and master plan adhere to these objectives.

Commission of Fine Arts

The AFRH met with the Commission of Fine Arts (CFA) staff on June 14, 2005, and the CFA received an information presentation on AFRH's master planning efforts at its July 2005 meeting. The CFA reviewed the final master plan at its January 17, 2008 meeting and at its meeting of March 20, 2008. At the CFA January 17th meeting many questions were offered by Commissioners in an effort to understand the intent of the sub area development plans, and the varied and specific characteristics of each. However, throughout the discussions there was a consistent expressed concern of inconsistent connections to the whole of the campus and its surrounding neighborhoods.

Additionally, the Commission members objected to what they noted as a lack of a clear design concept, commenting that it does not satisfactorily enhance the extraordinary resources of the site nor relate well to the surrounding urban context. It was noted that the urban forms illustrated in the plan needed to respond better to the context of the site and the grid of the surrounding city. Finally, the CFA members were dissatisfied with the proposed design for new development in Zones B and C, questioning whether the relatively small amount of proposed development would

be worthwhile. They expressed concern about the character of the proposed development in these parcels, particularly the perceived inappropriate suburban treatment of the residential buildings in Zone C. If possible, the Commission encouraged the consideration of retaining these areas as park land with public access.

At the March 20, 2008 meeting, the CFA Commission reviewed the final master plan and noted changes particularly in the Zone A development that addressed most issues of the January review. However, three Commissioners continued to express reservations about the nature and character of Zones B and C of the plan commenting that the loss of what has historically been a green landscape would be detrimental to the character of the campus and the adjacent neighborhood. They further noted their support of the community and public agency recommendations that these areas would best be parkland that is accessible to the public. Consequently, the CFA voted to approve only the AFRH Zone and Zone A of the master plan (see attachment).

Development Program

Applicant: Armed Forces Retirement Home-Washington

Estimated Cost: The submission has no estimated costs identified. Individual projects that comprise the master plan would be established under the specific developer proposals as determined in lease implementation documents or by the AFRH for federal projects.

Architect: The final plan was developed as a joint venture by The Staubach Company, Inc., Koetter Kim & Associates, Inc., EHT Traceries, Inc., Ault, Clark & Associates, Inc., Rhodeside & Harwell, Inc., and Roll Barresi, Inc. in cooperation with the master developer, Crescent Resources LLC for the Armed Forces Retirement Home in Washington, DC.

PROJECT ANALYSIS

Executive Summary

The current submission presents the final AFRH planning effort for a master plan that is long over due. The last prepared master plan occurred in 1970. However, the plan's revisions since the Commission last reviewed the draft plan in February 2006 are significant and as a whole improve the plan. Predominantly, the AFRH has obtained important public input to the historic preservation aspects of the master plan. The preservation plan is a component of the master plan, and the elements address many necessary actions required to maintain and conserve significant features of the campus buildings and site.

Staff, in general, believes that the planning objectives and the concept provisions of the final plan regarding the four planning zones maintain a theme of facility composition based on the existing open spaces that are identified in the final plan. The increased development density proposed is supported by the needs of the mission of the Home, and has been found by the District of Columbia Historic Preservation Review Board staff as a reasonable approach, although modifications are recommended by the DC-SHPO in regard to Zone C.

The total gross square feet proposed by all development zones has been reduced from the draft plan of 9 million gross square feet down to 6.1 million gross square feet. Building heights in the

AFRH Zone, the Zone A development, and the Zone B area are changed from the draft plan; with heights of 40 and 55 feet up to 85 feet. Some parcels in Zone A do reach 90 or 120 feet if mixed use or commercial use is the building's purpose. Zone C has been significantly altered to reduce density of development with only residential buildings of 40 feet.

Staffs finds that development under the form based standards is reasonable, established in alignment with NHPA Section 106 planning issue objectives, has been fairly reviewed by interested consulting parties to the Section 106 process, and has received input from the District of Columbia Office of Planning.

Staff observes the AFRH master plan demonstrates transportation management objectives for the plan, and consequently recommends that the Commission endorse the defined TMP. Furthermore, staff finds the federal employee parking space ratio adheres to NCPC Comprehensive Plan goal of 1: 4 for employee use, with the balance of consolidated parking dedicated to veteran residents and visitor parking. However, **staff also recommends that the Commission require the AFRH to submit to the Commission staff a copy of the annual Transportation Management Plan Performance Report that will be prepared by the Zone A Transportation Management Plan Coordinator (TMPC) (on-site manager).** This action will allow staff to monitor the TMP activities of Zone A and maintain a record of progress or change that may affect the federal lands of the home itself.

The impact of this AFRH master plan on the District's Strategic Neighborhood Action Plan for Brightwood Park, Crestwood, and Petworth has been considered by the Commission staff. The Ward 5 plan is also part of the staff review. That plan identifies community concerns regarding excessive traffic, increased neighborhood retail and public services, the negative effects of new commercial uses, and the availability of accessible open space. The District of Columbia Office of Planning has had input and did request revisions to Zone A that relate to the ward and Strategic Neighborhood issues. The plan with those District revisions demonstrates improved pedestrian access, more visual porosity of the street edges, and revised visual corridor focus points. The Zone A central open space area of 12.7 acres responds to the concern for accessible green space.

Flexibility of the Irving Street streetscape along Zone A is now also established in the building line layout that allows street activation to address possible future transit service in the Irving Street area. **Nevertheless, forthcoming additional coordination is recommended by staff to achieve a better private development response for reductions in parking as premium transit service is available in the coming years.** This service is identified by DDOT as an express-type limited stop transit service.

In summary, staff is recommending **approval of the final master plan with specific stipulations on the AFRH master plan as discussed in the paragraphs below.** Staff believes that implementing the recommendations will address the prevalent issue of need for conservation of open space in the vicinity as it relates to establishment of scenic easements for the AFRH National Historic Landmark and possible increase in accessible neighborhood open space and parkland. Further, the conditions address important transportation issues relevant to Zone A. In staff's opinion, the recommendations achieve further consistency with objectives of the Commission's Comprehensive Plan.

Staff believes the design density and the nature of form based guidance is clear for achieving the desired change in character and still assists maintaining basic attributes of the campus open space, landscape and streetscape character. Reasonable building massing is proposed in most Zones. With the careful implementation specified by the guidance, effects to historic structures and the impact of development on the character of the site are partially moderated.

The appropriateness of the plan's limit to 120 feet or less for building heights in Zone A responds to the Commission's Comprehensive Plan guidance to...“Preserve the horizontal character of the national capital through enforcement of the 1910 Height of Buildings Act”. Additionally, the suggested building heights conform to the focus in the Comprehensive Plan's emphasis of city terrain features...“[to] maintain the Florida Avenue escarpment's natural definition of the L'Enfant Plan boundaries by retaining developments that are fitted to the landforms and by promoting low-rise development that can be distinguished from the greater height of the L'Enfant City's core areas”¹. Moreover, staff of the District of Columbia Historic Preservation Review Board² noted that detailed efforts of developer design implementation are expected to reinforce the viability of the plan.

With regard to the most problematic aspect of the plan, Zone C presents important concerns on development in the context of maintaining important visual viewsheds, historic open space, and campus design character identified by the District of Columbia Historic Preservation Office. As noted by the DC-SHPO report, “Because this area is within the views from the oldest portion of the Home and along the historic approach—Lincoln's approach—to the main gate; because it is adjacent to the oldest intact areas of significant landscape; and because the green space here is the visual termination of the east-west streets... the HPO repeats its 2006 recommendation that this area not be developed.” Furthermore, much community focus on the proposed plan emphasizes the

need for recreational open space in this area of the city that is supported by the Commission's CapitalSpace study. Moreover, as noted by the AFRH Record of Decision for its NEPA compliance action, potential impacts that could not be mitigated include the commitment of land for construction of new buildings within AFRH. The total implementation of the master plan would include the loss of open space; removal of mature trees, and the permanent changes to the historic cultural landscape currently present at the site. The NCPC Comprehensive Plan itself refers specifically to AFRH in the NCPC policy stating that the federal government should “conserve portions of military reservations that add significantly to the inventory of park open space and natural areas and should, to the extent practicable, be used by the public for recreation.”

Consequently, staff observes that the loss of open space and historic viewshed in Zone C is an outcome which can be alleviated by additional options that have been partially addressed by the AFRH in its offer to discuss some conservation action with the National Park Service and possible other interested parties. Thus, **staff finds the Zones C guidance and master plan component for that area should be deferred from the master plan, and that the Commission approves Zones A and B contingent upon AFRH's commitment to explore the potential to develop Zone C as a public park that provides an income stream to the Armed Forces Retirement Home as follows:**

¹ *Comprehensive Plan for the National Capital: Federal Elements, Parks and Open Space Element*, p.116

² District of Columbia Historic Preservation Review Board Staff Report, Section 106 Review, Armed Forces Retirement Home, Development Master Plan--dated January 24, 2008.

- AFRH will participate in and contribute to a two-year planning and negotiation process to identify a strategy that will allow Zone C to be used as a publicly accessible park and provide an acceptable income stream to the Home. The process will include:
 1. AFRH commitment to participate in regular meetings and workshops with stakeholders, including NCPC, the National Park Service, the District of Columbia and community groups;
 2. A District of Columbia funded appraisal of the value of the land.
 3. Identification by stakeholders of an appropriate value and/or income stream to compensate for park use; (agreed upon values must be supported by real estate and financial analyses.)
 5. Agreement by stakeholders on acceptable options for conveying site control of Zone C, and responsibilities for the management, programming and maintenance of Zone C as a publicly accessible park (including long-term lease, transfer of development rights, and other options);
 4. Identification by stakeholders of a range of appropriate park uses and conceptual designs for Zone C;
 5. Identification of potential resources and funding options to address site control, capital improvements, management and maintenance; and
 6. Completion of any additional environmental and historic documentation by AFRH.
 7. Agreement among stakeholders on a timeline, with milestones, to secure resources and funding and complete appropriate agreements beyond the two year process;
 8. AFRH and NCPC staff will report to the Commission every six months on progress towards these goals.

The proximity of Zone C to the historic and environmentally sensitive National Historic Landmark of the AFRH convinces staff that Zone C should be reviewed by the AFRH for open space conservation

and not be approved for development. If the area is maintained in the master plan at the present time it would allow further formal District zoning action on that area in the next six to eight months, which would then need revision should results appear for maintaining Zone C as open space and parkland. Also, the time identified by the exclusion would allow the Park Service, other possible organizations and the interested community to fully investigate possible private funding sources or joint public-private efforts toward developing a financial plan that would address AFRH conditions for leasing or purchase of Zone C at some point in the future.

Given the present and plausible future climate of limited federal funding, staff feels maximum time for all parties to work with the AFRH, while the AFRH is also dealing with the implementation of Zone A, is a reasonable approach. Much of the analysis work and studies to review potential parkland or open space issues will necessarily be incrementally funded or be organized by private funding sources.

Staff notes, appreciates, and commends the AFRH for the planning elements in Zones A that affirmatively responds to Commission concerns in review of the draft plan, and that includes a portion of historic pasture area and other additional open space created and/or maintained in that zone (see diagram on page 24). But the importance of Zone C open space to the overall maintenance of open space and parkland to the capital city should not be underestimated, and its preservation should not be overlooked.

In the context of the transportation issues of Zone A, staff has found the issue of reducing Zone A parking important given the expressed concerns of District of Columbia agencies. Consequently, staff finds an approval of 5,155 spaces for Zone A parking achieves portions of the desired goals of both the Home and the District. The number has been developed by staff after analysis of both parties positions, and staff emphasizes the reductions include flexibility by way of the use of the agreed upon factors/triggers and additional analysis that the developer, the District Office of Planning, and the District Department of Transportation must use to justify any decrease or increase in spaces after phase one. The approach allows shared parking development for the phases of Zone A. The results would be progressively reviewed by the annual TMP accounting for Zone A; reduces the full parking component for the zone; institutes shuttle service from Zone A to two different Metro stations that is reviewable by the annual report on Zone A; and establishes a transit oriented base of development available to the District for supporting premium service transit as some future date.

CONFORMANCE

1970 Master Plan

The submission is an update and revision to the existing 1970 master plan and would replace that document when the present submission is approved by the Commission.

Urban Design and Security Plan

The submitted plan has undertaken a level of security review by the AFRH for protection of federal real property and safety of the resident veterans, many who are elderly. The impact of the physical security measures—a secure perimeter fence and controlled visitor access, is limited to

the vehicle and pedestrian traffic entering *only* the AFRH Zone and its surrounding recreational areas. In context of the current AFRH boundary and the nearby community, the AFRH existing campus was originally closed to the public in 1925. The final plan would now reduce the perimeter fence area of the Home and provide public access to Zones A, B, and C.



National Environmental Policy Act (NEPA); Determination of Effects

Pursuant to the requirements of NEPA, the AFRH prepared an Environmental Impact Statement (EIS) on the master plan and potential associated projects affiliated with Zones A, B and C. The AFRH circulated the EIS for a 45 day public comment period in May 2005. The AFRH completed

its review of comments and conclude the Final EIS (FEIS) in November 2007, with a Record of Decision on the final master plan in February 2008.

The NCPC is required to provide its own separate review of the final EIS. The NCPC environmental conclusions are presented below regarding the planning for the AFRH final master plan and addressing proposed future improvements on federal government property. This section of the report presents a summary of the environmental considerations, as required by NEPA Regulations, 40 CFR 1505.2. The adopted FEIS along with this staff report constitutes NCPC compliance with NEPA.

Alternatives Considered

The NCPC adopted FEIS evaluates in detail four alternatives that were developed toward the purpose and need of the project, or were required by the NEPA review process to be evaluated in detail. The alternatives, except the No Action alternative, have several common elements involving the location of master plan components on the AFRH campus.

The FEIS also describes the impacts on historic resources subject to Section 106 of the National Historic Preservation Act that may result from the proposed implementation of the master plan and also identifies environmental mitigation measures. In evaluating the No Action alternative, the adopted FEIS recognizes that until development occurs the existing conditions remain and the AFRH campus continues to exist as a federal operation controlling a land area of 272 acres.

The alternatives fully considered and reviewed in the FEIS include the following:

Alternative 1 – No Action Alternative

Under the No Action Alternative, the action proposed in this EIS would not be taken. AFRH would remain under federal ownership, with AFRH as the holding agency. No new construction would occur on AFRH under this alternative. The site would exist with portions underdeveloped, with scattered, unused, and mostly non-revenue producing buildings. The facility would remain a continual-care enterprise for veterans, with a fenced perimeter and guarded entry from Rock Creek Church Road and North Capitol Street, and restricted to those with business on site. The No Action Alternative does not support the intent of the Armed Forces Retirement Home Act of 1991, as amended (24 U.S.C. §401 et seq.).

Alternative 2

Under Alternative 2, certain AFRH land areas would be developed to accommodate Institutional, Residential, Hotel/Conference, Research Development, Retail, and Medical land use activities in a total amount of constructed new space of approximately 8.6 million square feet. The program and density were derived from private sector concepts to redevelop portions of the site for medical and research and development purposes, given the site's proximity to the medical area to the south and planned expansions on the part of some of those hospitals.

Alternatives 3A, 3B, and 3C

Under Alternatives 3A, 3B, and 3C, the AFRH would be developed to accommodate Institutional, Residential, Hotel/Conference, Research Development, Office, Retail, and Medical land use activities in a total amount of constructed new space ranging from approximately 6.16 to 6.9 million square feet.

In these alternatives, development zones on the AFRH would include the following:

- At the AFRH operations there would be moderate in-fill development within this Zone. In addition, several holes on the golf course would be relocated. All alterations to the golf course would occur within the footprint of the current golf course.
- Zone A is designated for residential, office/research and development, retail, hotel, and medical uses.
- Zones B and C are designated for residential development or partial mixed use, which would take place at a later time.

Alternative 4

Under Alternative 4, AFRH would be developed to accommodate Institutional, Residential, Office, Retail land use activities in a total amount of constructed new space of approximately 6.3 million square feet.

Development zones on AFRH would include the following:

- The AFRH Zone is designated for institutional uses and new residential units compatible with AFRH operations. There would be moderate in-fill development within this Zone.
- Zones A and B would be developed with residential, office, and retail uses.
- Zone C would contain residential development compatible with the residential development west of Rock Creek Church Road.

Environmentally Preferred Alternative

The alternative that best meets the objectives of NEPA is known as the Environmentally Preferred Alternative. This option, according to the Council on Environmental Quality, is the alternative that causes the least damage to the biological and physical environment. It also is the alternative which best protects, preserves, and enhances historic, cultural, and natural resources. Identification of the Environmentally Preferred Alternative is a requirement of NEPA regulations regardless of the intent of the project within an EIS process. On the basis of all information presented in the NEPA review involving the proposed action; it is the determination of NCPC staff that the Environmentally Preferred Alternative is Alternative 3A.

Moreover, Alternative 4 annual PTE NO_x emissions show that it also would be classified as “major source” under the air quality regulations and would require additional provisions for compliance permits, whereas design measures would meet the needs of Alternative 3A.

NCPC staff determined Alternative 3A conforms to efforts that do not detract in a major adverse fashion from most, but not all, of the goals and objectives of Commission plans and programs of

the Comprehensive Plan, and is generally consistent with Commission plans and programs. Furthermore, Alternative 3A is the alternative implemented by the final master plan as presented by the AFRH to NCPC, and which has its cultural effects fully analyzed and mitigation provisions established through a signed and completed Section 106 Programmatic Agreement. This agreement creates full preservation measures that serve to avoid, reduce effects, and mitigate actions associated with the proposed action and the important historic resources of the AFRH (see section on Historic Resource Effects at page 37). Likewise, the final master plan modifications

include the NCPC required TMP for both the AFRH Zone and the proposed Zone A developer's plan.

The following were the major factors used by NCPC staff in review of the potential environmental effects for the AFRH final master plan.

Air Quality

The project site is located within the National Capital Interstate Air Quality Control Region, which has been designated by EPA as a "moderate non-attainment area" for ozone National Ambient Air Quality Standards (NAAQS). Ozone is a secondary pollutant that is formed in the atmosphere by the reaction of hydrocarbons and nitrogen oxides in the presence of sunlight. The air quality analysis for AFRH was performed in accordance with guidelines set forth by 23 CFR Part 771, 49 CFR Part 622, the CAA, the NEPA, and the *Guidance for the Analysis of Air Quality Studies Performed as a result of the Environmental Impact Screening Form Process* (DCDOH 2003), as they appropriately apply. The analysis addresses both mobile and stationary sources of air pollutant emissions anticipated to change as a result of development of the master plan.

The analysis of mobile sources for AFRH focuses on CO because it is localized and directly relates to traffic volumes and patterns which will be affected by future site development. This analysis was prepared in accordance with guidance set forth by the U.S. Environmental Protection Agency (EPA) *A Modeling Methodology for Predicting Pollutant Concentrations near Roadway Intersections* (EPA 1995). Fourteen air quality receptor locations were selected to represent sensitive air quality locations near the intersection of North Capitol Street and Michigan Avenue. This intersection, without any improvements, represents the worst-case intersection because of it would operate at a Level-of-Service F in 2020 for the build Alternatives.

The mathematical model used to estimate future CO concentrations was the current version of the EPA's CAL3QHC dispersion model. The CAL3QHC dispersion model is a microcomputer-based modeling methodology developed to predict the level of CO or other inert pollutant concentrations for motor vehicles traveling near roadway intersections. Using CAL3QHC, both the 1-hour and 8-hour CO levels were predicted near the North Capitol Street and Michigan Avenue intersection, and the results were compared to the NAAQS for CO.

The maximum 1-hour CO concentrations were modeled using the AM and PM peak hour traffic volumes. To determine the maximum 8-hour average CO concentration, the hourly traffic volumes were calculated by using the AM and PM peak-hour traffic volumes and daily traffic distributions by hour (diurnal curve). The hourly time segments were analyzed at each receptor to determine the CO concentrations for each hour. The highest eight consecutive hourly concentrations were averaged to obtain the 8-hour average CO concentration. None of the maximum CO concentrations for the peak AM and PM hours would exceed the NAAQS of 35 ppm for 1-hour emissions.

Further, none of the eight hour averages would exceed the NAAQS of 9 ppm for 8-hour emissions. Although the CO emissions near the intersection of North Capitol Street and Michigan Avenue would not exceed NAAQS, the Build Alternatives would cause an increase in localized CO emissions. Therefore, mobile sources would have direct, minor impacts on air quality.

The majority of expected project-generated emissions of ozone precursors would be generated by mobile sources (vehicular traffic). Short-term effects from construction and operation of facilities

and trucks in regard to air impacts would have minor effects, and the following actions for these effects include:

- Exposed soils will be moistened or stabilized with ground cover to minimize dusty site conditions during the construction period.
- A construction entrance with soil erosion impact measures will be installed at truck exit points to minimize dirt tracked from the site.
- Construction equipment will be in compliance with air quality and emissions requirements.
- Trucks will be washed as necessary to minimize the movement of dirt from the construction site to the local roadways.

The annual Potential to Emit (PTE) NO_x emissions estimated for the final master plan indicate that emissions would exceed the annual *de minimus* NO_x threshold of 25 tons per year for Washington, DC under the General Conformity rule for severe 1 hour limits. Mitigation for NO_x emissions controls can be incorporated into the initial engineering design for the master plan staged implementation of individual projects in order to reduce annual PTE NO_x emissions to below the *de minimus* threshold. By implementing this option with building system boilers, no formal general conformity determination would be required to be performed.

Potential NO_x emission control options include:

- Take limits on permitted hours of operation per year, and
- Incorporate NO_x control technology.

NO_x control technology options for boilers include low NO_x burners, selective catalytic reduction (SCR) and selective non-catalytic reduction (SNCR) control technologies.

Hazardous Materials

Limited hazardous materials/hazardous waste issues were identified and assessed during the Phase I and Phase II Environmental Site Assessment (ESA) studies conducted at the AFRH. Environmental contamination issues are being resolved prior to implementation of any of the individual projects under the AFRH plan. The final remediation of the limited sites, which are situated on the AFRH Zone, will be coordinated with the District of Columbia Department of Health requirements and provisions of the District of Columbia Department of the Environment. The removal of hazardous waste and contaminants in the buildings and on the site would have a direct, long-term, minor, beneficial impact.

Terrestrial Biological Effects

Due to AFRH campus proximity to highly developed residential and urban areas, wildlife within the project area is limited to those species adjusted to human disturbance. Approximately 188 acres or 70 percent of AFRH campus would continue to provide wildlife habitat. Wildlife species would only be impacted by construction noise and activities. The master plan would have direct, short-term, minor, adverse effects to wildlife.

Within the AFRH Zone, limited portions of mature forested areas would be removed and replaced with residential housing. Within parts of the Zone A and Zones B and C, mature trees and meadow areas would be replaced with development. The impact to vegetation on AFRH would be direct, long-term, moderate, and adverse depending on how these buildings are located in these zones. However, many mature trees are specified under provisions of the master plan development guidelines to be preserved or replaced.

The proposed action, when added to past and reasonably foreseeable future projects in the vicinity of AFRH, such as the Washington Hospital Center, has the potential to have a cumulative long-term, moderate, adverse effect on forests and wildlife in the region. Located in an urban environment, AFRH is surrounded by development and is one of only a few areas of substantial landscaped green space remaining in the vicinity.

Mitigation measures for effects to vegetation and wildlife primarily consist of maintaining large green spaces that provide for wildlife habitat and movement corridors. Large areas of forest would be retained under the AFRH final master plan to provide similar habitat to that which exists today. Re-vegetation as a result of impacted areas from construction activities, would also mitigate impacts to terrestrial biota.

When replacing historic plant material, use of the same species, or, if not available, a similar species that has qualities of the historic vegetation would occur. When rehabilitating or modifying the landscape resources, respect the historic relationship between the built and natural resources to endure the preservation of the landscape design would occur. The developer will need to use construction methods that avoid damage to tree roots and will be supplementing historic trees along Pershing Drive and other historic stands that are damaged in construction.

Stormwater Drainage

Under the AFRH final master plan, surface water features on AFRH site will be directly affected. Under all of the alternatives, concrete channelized streams may need to be diverted, and relocation of the channelized streams would have a direct, short-term, minor, adverse impact on surface water resources. No construction is proposed in the region of the fishing ponds, located in the southwestern portion of the site.

Site development on AFRH campus would result in temporary impacts to stormwater quality. Disturbance of soils on the site increase the potential for sediment and contaminants to be transported off of the site during a storm. This impact would be temporary, lasting the duration of construction, and would be mitigated by the use of sediment and erosion control measures. Therefore, a direct, short-term, minor, adverse impact is anticipated.

Indirect effects will include the construction of increased impervious areas within the AFRH campus. Impervious areas increase the amount and temperature of runoff, which may increase the peak discharges and temperatures within the receiving paved channels, the stormwater retention pond, and the present fishing ponds. Higher discharges into a stream can cause erosion and flooding downstream. These indirect, long-term, moderate, adverse impacts would affect the paved channels, the stormwater retention pond, and other water resources of the AFRH.

For the final master plan, impervious surfaces increase within the whole of the 272-acre site by 14 percent. The AFRH master plan exhibits 32 percent impervious surface area for the 272 acres involved in the plan, and would equate to the similar impervious surface areas of the urban areas of the Anacostia River watershed that exhibit approximately 27 percent impervious surfaces (Metropolitan Washington Council of Governments). Current plans of the District of Columbia for Reservation 13 development areas (Hill East neighborhoods), adjacent to the Anacostia River, exhibit 35 percent impervious characteristics as a comparison, as defined in its 2004 master plan for development of that parcel. Levels of impervious surfaces, in general, when reaching extents of 20 to 25 percent or greater for urban areas, are deemed to have sustaining conditions that are detrimental to water quality.

Because of increases in impervious area at the AFRH, there would be a subsequent increase in stormwater runoff. Therefore, the developed sites are subject to stormwater management requirements pursuant to DCMR Title 21, Sections 538 through 545 of the District of Columbia. Stormwater management quantity requirements dictate that controls must be put in place to ensure that the post-development peak runoff is equal to or less than the pre-development runoff for the 15-year storm event. All District of Columbia requirements will be met by both the AFRH and the Zone A developer.

The surface water storage requirements may be satisfied with underground sand filter structures that can be designed to provide both water quality and quantity management for a limited area. It is anticipated that most of the required water quantity management volume will be provided by quantity management requirements within drainage areas that can be met by smaller localized Low Impact Development (LID) measures and with a stormwater management pond serving the drainage areas. If both water quality and quantity goals are to be met by ponds, then it would most likely be a wet detention or retention pond, or a combination pond and wetland.

For implemented control measures, the first half-inch of runoff generally contains between 85 and 90 percent of the pollutants in the initial runoff volume. The District of Columbia's management strategy for treating stormwater is to capture and isolate the first-flush runoff from impervious surfaces within the drainage area. Post-development land use characteristics and projected future activities of the impervious area determine the depth of runoff that must be held for water quality treatment.

Removal rates for the pollutants vary depending on the Best Management Practice (BMP) used and the type of pollutant. In addition, removal rates for stormwater management ponds represent the approximate mean of all types of BMPs. Approximate removal rates can be found in the DC Storm Water Management Guidebook. Existing stormwater conveyance systems may be used for

post-development runoff if found adequate. Where possible, the open channel systems on AFRH property would be utilized to alleviate additional loads on the combined sanitary/stormwater sewer system.

As required by law, on-site stormwater management controls would be provided to limit the amount of storm runoff leaving the site during a storm event and to reduce the amount of contaminants in that runoff. Stormwater quantity and quality management practices required by the

District of Columbia would ensure no increase in post-development runoff peak flow and would mitigate the impacts of increased stormwater runoff on the combined sewer system.

The stormwater storage requirement for site development site can be satisfied with stormwater management ponds, underground sand filter structures for both quality and quantity control, and a variety of urban BMPs and Low Impact Development. These include bioretention devices, water quality catch basins, manufactured water quality BMP's, design small cistern systems, and green roofs. The layout and sizing of each individual BMP system will be fitted to the requirements of the local structure, road, parking area and building location area it serves. In order to minimize the problem of "combined sewer overflow pollution," low impact best management practices will be employed to reduce the effects of stormwater. In addition, available green spaces may be used as a place to discharge stormwater from rooftops, parking lots, and streets to take advantage of infiltration and reduce stormwater loads on the combined sewer system.

To reduce the effects of construction on stormwater runoff, DCMR Title 21, Sections 538 through 545 requires the use of sediment and erosion control practices that would minimize the amount of sediment leaving the site. The practices are included in the DC Erosion and Sediment Control Handbook and are specified as part of an engineered plan. When these practices are implemented correctly, the amount of sediment leaving the site would be within acceptable tolerances. The Watershed Protection Division has the responsibility to enforce the maintenance of these temporary protective devices.

Noise

The master plan provided to NCPC does not result in significant additional noise impacts. Traffic increases resulting from development are predicted on North Capitol Street, but existing and proposed noise-sensitive areas are far enough removed from North Capitol Street to receive minor one (1) decibel noise increases over the No Action condition. Therefore, the master plan would have a direct, long-term, negligible, adverse impact on noise levels. Land uses that are sensitive to noise associated with increases in traffic would also be sensitive to construction noise. The extent and severity of the noise impact would depend upon the noise characteristics of the construction equipment in use and the time of day that construction takes place. As with any major construction project, areas around the construction site are likely to experience varied periods and degrees of noise impact. Therefore, construction associated with implementation of the master plan would have direct, short-term, moderate, adverse impacts on noise levels.

No indirect impacts to noise levels would occur under the master plan. Past, present, and future development within the Washington DC region will continue to produce additional traffic and noise sources which would cumulatively affect noise levels. The master plan when combined with past, present, and future development, would have a cumulative, long-term, minor, adverse impact on noise levels in the region.

Mitigation measures will be developed and enforced through transaction documents between AFRH and the developer through a construction management plan, and review by NCPC of AFRH projects occurring within the AFRH Zone. Mitigation actions include:

- All construction equipment powered by an internal combustion engine would be equipped with a properly maintained muffler.
- Air compressors would meet current U.S. EPA noise emission standards.
- New construction equipment would be used as much as possible since it is generally quieter than older equipment

- Nighttime construction activities would be minimized.
- Noise barriers around stationary noise sources would be established.

Construction activities will comply with Chapter 28 of the District of Columbia Municipal Regulations details for construction in residential zones. Operational and design project features will include:

- Noise from construction will not be permitted on Sundays or legal holidays or from 7:00 pm to 7:00 am.
- Operational noise will be minimized through a combination of site planning that allows topography to serve as a noise control feature, architectural design, and noise control methods applicable during construction. Appropriate building materials will be used, such as sound absorbing concrete masonry. Poured concrete floors will also be incorporated into the building to lessen the transmission of vibrations and noise outside the facility. Closed truck bays will be utilized in the project design to control truck loading and truck start-up noise involving building operations.
- A display sign will be posted at the facility construction exit points to remind truck drivers to adhere to traffic noise limits established by the District, as they drive local streets to reach major thoroughfares during construction of large new facilities.

Transportation

The submitted master plan would result in a direct, long-term, major, adverse impact on traffic levels in the area. Intersections at North Capitol Street/Harewood Road and Irving Street/1st Street/Site Access would fail.

Trips generated by the proposed master plan are based on the number of parking places provided for each land use. The differences in the trips generated were accounted for at the three entrances along Irving Street. These trips were assigned based on their proximity to the proposed access points and then distributed on the roadway network based on the existing traffic distributions.

The submitted plan is expected to generate approximately 2,726 vehicle trips during the AM peak hour and approximately 3,664 vehicle trips during the PM peak hour for the whole of the road area. The trip distribution for AFRH was developed using the existing traffic counts, the major roadways in the area, and accessibility to the site. Three access points are to be provided along Irving Street to serve the primary retail, office, hotel, and residential areas that comprise Zone A of the master plan. The primary access along Irving Street is to be built opposite First Street, NW to form the fourth leg of a full-movement, signalized intersection. Furthermore, the second access

point along Irving Street is built about midway between the First Street, NW intersection and the ramps from the North Capitol Street interchange. This intersection would have right-in/right-out access only to and from westbound Irving Street. The third access point along Irving Street is to be an intersection between Park Place and First Street. The fourth access point along Irving Street is to be a right-in/right-out access only to and from westbound Irving Street into Lakes Circle and connecting back to Pershing Drive. Another principal access point will be via the gate at Scale Gate Road where the existing diamond interchange is almost completely unutilized.

Access to the institutional and residential areas of the AFRH Zone will be provided at the existing intersection of Rock Creek Church Road and Upshur Street and via the existing intersection of

Harewood Road, NW and Lincoln Drive, NW, midway between Rock Creek Church Road and North Capitol Street. Trip distributions were determined based on the existing traffic volumes and land uses established by the plan.

Overall, the master plan is expected to add approximately 1,125 vehicles per hour (vph) along North Capitol Street south of Michigan Avenue in the AM peak hour and approximately 1,525 vph in the PM peak hour. The plan would also add approximately 475 vph along North Capitol Street north of Harewood Road during the AM peak and approximately 610 vph during the PM peak. Scale Gate Road at North Capitol Street is expected to experience an increase of approximately 100 vph during the AM peak and 160 vph during the PM peak.

Most intersections are expected to operate at LOS D or better during both the AM and PM peak hours, with the exception of Irving Street/1st Street, North Capitol Street/Michigan Avenue (which also fails under the No Action Alternative), and North Capitol Street/Harewood and North Capitol Street/Fort Drive; all operating at E or F conditions. Therefore, the proposed action would have a direct, long-term, major, adverse impact on these intersections.

Improvements could be added to the Irving Street/1st Street NW intersection. The added capacity could include a new right turn lane on the westbound Irving Street approach, the construction of double left turn lanes on the southbound site exiting lanes, and the construction of a third eastbound through lane. Even with these capacity enhancements, the intersection is still expected to operate at LOS E during the PM peak hour.

The intersections of North Capitol Street/Fort Drive and North Capitol Street/Harewood Road are expected to operate at capacity conditions (LOS E) during the peak hours. The provision of a northbound through lane at both these intersections would make them operate at LOS D during the peak hours. As discussed, the Irving Street/1st Street intersection is anticipated to operate at LOS E during the 2020 peak hours even with significant capacity expansion associated with construction of the Zone B development entrance. Much of the heavy-trip generating existing uses are situated near this intersection, and both the development and the Washington Hospital Center would have high PM peak turning volumes toward North Capitol Street to the east, adding to the congestion of the area.

A transportation management plan (TMP) has been developed for the master plan for both the AFRH Zone and Zone A. The following summarizes the aspects of the TMP, which was modified in June 2008 in discussions with the District Department of Transportation (DDOT).

The Zone A TMP focuses on Transportation Demand Management (TDM) strategies that the developer, and any subsequent sub-section developer or tenant, will implement on site. The TDM strategies presented are to be realized to reduce potential impacts to traffic and air quality from the mixed use redevelopment within the Zone A project area and surrounding vicinity. The goals of the TMP are:

- Encourage alternate forms of transportation to minimize single occupancy vehicles (SOV) for workers and residents;
- Promote the use of public transit (bus, Metro, commuter train) for work commuting trips; Reduce the impact of trips generated by workers and residents in Zone A on the local and regional roadway system, achieving a Level of Service (LOS) D or better at major intersections adjacent to the site; and

- Develop the site to promote safe and aesthetic pedestrian and bike paths.

The following TDM strategies will be implemented in phases as the construction of the site is completed for the Zone A area. The strategies were selected to provide a range of activities that will be used by developers and tenants to meet the goals of the TMP. These measures are:

- Establish a Commuter Center – provide services and information related to alternative travel modes
- Utilize the Commuter Connections program
- Promote Transit use
- Carpools
- Vanpool
- Guaranteed Ride Home – provided by the MWCOG system with participation commitment.
- Telework
- Join the Clean Air Partners network
- Utilize Air Quality Action Days with incentives
- Establish a Parking Management Program – allocation and enforcement
- Provide Shuttle service to Metro Stations
- Promote Bike/Pedestrian mode of transportation
- Promote Alternate work schedules and encourage commercial tenants to promote alternate work hours to a multimedia Website
- Promote participation in existing local transportation services programs to include-
 - o Flexcar
 - o Zipcar
 - o NuRide
 - o SmartTrip Cards
 - o Smart Commute Initiative
 - o Washington Area Bicycle Association
 - o GoDCgo.com
 - o VPSI

To promote the use of High Occupancy Vehicles (HOV), the TMP calls for:

- Reserved carpool/vanpool spaces will be conveniently located;
- Registered vanpools will be provided with free parking;

- Registered carpools with three or more occupants will receive a parking subsidy; equal to one-half of the monthly parking rate for Single Occupancy Vehicles; and
- Monthly parking rates for SOVs will be consistent with comparable office buildings located in the vicinity.

As of June 13, 2008 the TMP was modified to respond to DDOT issues. The following additional actions are now provided in the submitted master plan:

- The proposed land use diagram on page 96 of the master plan for Zone A was updated to reflect the transfer of potential retail from the Parcels H and I immediately adjacent to the Scale Gate Road entrance to Parcel T in response to DDOT comments.

- The applicant has developed a 30% non-single occupancy vehicle mode split without capacity expansions to the adjacent roadways in the TMP. The following strategies demonstrate how such a reduction will occur:

- Trip Reduction for TDM Strategies

- *Carpool (1.4%)* – 297 spaces will be made available at a discount and in preferential locations to encourage participation.

- *Internal Shuttle Service (.4%)* – service to metro station with multiple internal stops on Zone A and possible coordination with Hospital Complex to the south.

- *Vanpool (1%)* – 89 spaces will be made available at a discount and in preferential locations to encourage participation.

- *Bicycle Improvements (.3%)* – construction of trails, bike racks, and lockers to encourage participation.

- *Telework / Alt Work Schedule (.2%)* – employee participation in work from home program and/or employee participation in compressed work week (9 day, 80 hour work schedule – 1 day off every 2 weeks).

- *Car Sharing (3.7%)* – reserved spots on site for short term car rentals to encourage use and discourage users from purchasing a vehicle.

- *TDM for Residents (5.4%)* – marketing efforts geared to residential use of alternate modes of travel for non-work trips.

- *Taxi Stands (.5%)* – reserved spots for taxis to encourage participation for trip activity rather than using a personal vehicle.

- 2030 MWCOG Mode Choice Model

- 12% estimate of transit mode share calculated by regional model without the inclusion of specific internal transit shuttle services or premium transit.

- Internal AFRH Capture Rate

- 8.5% estimate due to the introduction of multi-purpose development decreasing the number of trips that are made off-site.

The above strategies result in a 33.5% non-single occupancy vehicle (SOV) mode split to the TMP without capacity planning expansions to the adjacent roadways.

A schedule for implementation measures is identified in the TMP through anticipated phasing of the Zone A development, as reflected in the following charts. The individual development of all projects within the Zone A area will adhere to the objectives of the TMP and are to be constructed

and operated with such conditions specified in individual parcel development agreements adhering to the TMP.

TDM Strategy	TMPC Responsibilities/Implementation Strategies	Implementation Period
<i>CCTS</i>	<ul style="list-style-type: none"> • Brand TDM program for development. Create marketing materials on Transportation Options; Develop TDM Strategic Plan, Marketing Plan, Monitoring & Evaluation Plan and Parking Management Plan. Create website for TDM program brand. There will be two separate marketing efforts and materials, one specifically for commercial tenant and the other for residential occupants. Coordinate with developer leasing department/division. • Open Commuter Center/Transit Store • Meet with tenants, residents and employers to provide information and opportunities to sign up for programs • Develop electronic newsletter to provide current information to subscribers and tenant offices and residents • Obtain information on Smart Benefits for distribution to employers. • Implement and operate TDM programs and services 	<p style="text-align: center;">2008</p> <p style="text-align: center;">2011-2012</p> <p style="text-align: center;">2012</p> <p style="text-align: center;">Continuous</p>
<i>Carpooling</i>	<ul style="list-style-type: none"> • Work with employers to encourage their employees to apply to the Commuter Connections free ridematching service for carpooling and vanpooling. Hold carpool/vanpool formation meetings at their worksite to introduce potential carpoolers/vanpoolers to one another. Invite representatives from vanpool companies to provide information on their program and service offerings. • Enroll tenants/residents in the region-wide guaranteed ride home program • Provide free ridematching services for vanpooling and carpooling to assist tenants/residents to find people to share rides. • Establish ridesharing enrollment drives periodically throughout the year, in addition to organizing a drive when a new tenant signs a lease. • Host "Zip code parties" which the TMPC can facilitate meetings between potential ridesharers. <p>Promote the program on a periodic basis to the residents through the Tenants Association</p>	<p style="text-align: center;">2011-2014</p>

TDM Strategy	TMPC Responsibilities/Implementation Strategies	Implementation Period
<i>Vanpooling</i>	<ul style="list-style-type: none"> • Work with employers to establish vanpools by holding both centralized and individual office-based informational events and developing a packet of informational materials to be distributed at the meetings. • Provide information on vanpool services from WMATA’s website and Commuter Connection’s website • Enroll tenants/residents in region-wide guaranteed ride home program 	2011-2014
<i>Guaranteed Ride Home</i>	<ul style="list-style-type: none"> • Work with employers and residents to inform potential users about the program by holding both centralized and individual informational events • Enroll tenants and residents in program 	2011-2014
<i>Telework/Virtual Office</i>	<ul style="list-style-type: none"> • Provide information to employers and residents by holding both centralized and individual office-based informational events and developing a packet of informational materials to be distributed at the meetings 	2011-2014
<i>Live Near Your Work</i>	<ul style="list-style-type: none"> • Provide information on housing in the Zone A Development to the Commuter Connections online employer program, Employer’s Resource Guide • Provide information on housing at the Commuter Center and on the development’s website • Provide information on housing to the local hospitals and universities 	2012-2014 Continuous Continuous
<i>Clean Air Partners</i>	<ul style="list-style-type: none"> • Join organization • Provide information to tenants/residents on how to implement an action plan for employers and residents on Air Quality Action Days 	2012-2013
<i>TDM and Parking Management Plan</i>	<ul style="list-style-type: none"> • Inform developers, tenants, and residents on the TDM and parking management plan as part of their lease agreement • Administer Strategic and Parking management plan incentives 	2009-2013
<i>Shuttle to Metro</i>	<ul style="list-style-type: none"> • Implement initial shuttle service upon completion of specified Phase 2 Development density • Expand shuttle service upon completion of specified Phase3 Development density • Inform tenants and residents of shuttle service schedule/operations 	Date of implementation is determined when leasing quotas are met
<i>Multimedia Displays</i>	<ul style="list-style-type: none"> • Ensure information displays are stocked with current information 	2012-2014

TDM Strategy	TMPC Responsibilities/Implementation Strategies	Implementation Period
	<ul style="list-style-type: none"> • Ensure displays are operational 	
<i>Transit Use</i>	<ul style="list-style-type: none"> • Work with WMATA to establish bus stop/bay along north side of Irving Street in commercial/retail area and at Scale Gate • Provide transit information on routes, schedule, and fares to future tenants and residents. • Assist in initial trip planning by identifying routes and schedules for employees/residents • Work with tenants to establish Smart Benefits Transit Program for employees. 	2009-2012
<i>Bicycle Access</i>	<ul style="list-style-type: none"> • Provide information on bike paths, bike racks, and lockers to tenants and residents • In conjunction with the Master Association, maintain bike paths and sidewalks to promote safe non-vehicular travel in the development 	2012-2014
<i>Alternate Work Hour/Work Week Schedule</i>	<ul style="list-style-type: none"> • Provide information to employers and residents by holding both centralized and individual office-based informational events and developing a packet of informational materials to be distributed at the meetings. 	2012-2014
<i>Master Association Website</i>	<ul style="list-style-type: none"> • Develop webpage for transportation information, including link to Commuter Center • Maintain website with current information 	2013-2015 Continuous
<i>Taxi Stand</i>	<ul style="list-style-type: none"> • Work with District of Columbia Taxicab Commission to establish taxi stand(s) in the development • Provide information to tenants on location of taxi stands and operations of taxis 	2012-2014 Continuous
<i>Local Programs</i>		
<i>Flexcar</i>	<ul style="list-style-type: none"> • Provide information to employers and residents by holding informational events and developing a packet of informational materials to be distributed at the meetings • Work with Flexcar to establish space within the development • Assist in enrolling employers and individuals in program 	2012-2014 Continuous

TDM Strategy	TMPC Responsibilities/Implementation Strategies	Implementation Period
Zipcar	<ul style="list-style-type: none"> • Provide information to employers and residents by holding both centralized and individual office-based informational events and developing a packet of informational materials to be distributed at the meetings • Work with Zipcar to establish space within the development • Assist in enrolling employers and individuals in program 	2012-2014 Continuous
NuRide	<ul style="list-style-type: none"> • Provide information to employers and residents by holding both centralized and individual office-based informational events and developing a packet of informational materials to be distributed at the meetings • Assist in enrolling employers and individuals in program 	2012-2014 Continuous
SmartBenefits	<ul style="list-style-type: none"> • Provide information to employers and residents on SmartBenefits program • Apply to WMATA to become sales center for SmarTrip cards • Provide discounted SmarTrip cards (i.e. instead of \$30 charge \$15) for first time card purchasers. This includes the cost and one-time charge for the actual debit card. 	2012-2014 2012-2014 Continuous
Smart Commute Initiative	<ul style="list-style-type: none"> • Work with real estate developers to provide information to residential home buyers • Provide information on the Master Developer website • Provide information to tenants and employers at informational events 	2012-2014 Continuous Continuous
SmartBike DC	<ul style="list-style-type: none"> • Coordinate with DDOT on locating a SmartBike station within the Zone A Development as the SmartBike program expands in the District • Provide information to tenants and residents on SmartBike via the Commuter Center 	2012-2014 Continuous
Washington Area Bicycle Association	<ul style="list-style-type: none"> • Join the organization • Promote safe biking with events on site in conjunction with association 	2012-2014
GoDCgo.com	<ul style="list-style-type: none"> • Add web address to Master Association Website and include in newsletters 	2012-2014
Vanpool Providers	<ul style="list-style-type: none"> • Provide information to tenants, employers, residents at informational events • Assist individuals in locating vanpools 	2012-2014 2012-2014

Zone A operational actions to be implemented as TMP measures include:

Item	Phase	Initial Implementation Period
Construction of pedestrian paths and bike paths	1	2009-2011
Build Commuter Center/Transit Store	2	2010-2012
Begin Metro Shuttle Service	2	Initiated upon completion of specified Phase 2 Development density; projected 2012-2014
Install bike racks, showers, and lockers in office buildings	2 and 3	Projected 2010-2013, prior to occupancy of commercial office space
Install bike racks in retail areas	2 and 3	Projected 2010-2013, prior to occupancy of retail space
Install Multimedia displays	2 and 3	Initiated upon leasing of office or residential parcels Projected 2012-2014 Projected 2015-2016
Expand Metro Shuttle Service	3	Initiated upon completion of specified Phase 3 Development density; projected 2015-2017

Of significant interest to both the applicant and DDOT is the implementation of small-bus (24 passenger) shuttle service to nearby Metrorail stations from Zone A.

The agreed-upon shuttle service will run from the development to the Brookland-CUA Metro Station and to the Columbia Heights Metro Station (two separate routes). The routes would travel through the site on the same roads and stop to pick up passengers at the same locations to avoid rider confusion. The site can be effectively served with approximately 5 stops; with Zone A buildings located within a couple blocks of a shuttle stop (exact locations would be determined once individual building designs are completed). Off-site, the shuttles would run as express service making no stops until reaching the metro stations.

The service patterns for the shuttles are summarized in the tables below. The estimate of the TMP is that headways would be somewhat variable in the peak period due to traffic congestion. The shuttles would run on a fixed schedule during the off-peak periods.

Brookland – CUA Weekday Shuttle

Time Period	Approximate Headway (Minutes)	Vehicles in Service	Vehicle Hours of Service (Hours)
6:30AM - 9:00AM	30	1	2.5
9:00AM – 4:30PM	30	1	7.5
4:30PM – 7:00PM	30	1	2.5
7:00PM – 8:00PM	30	1	1
Total			13.5

Columbia Heights Weekday Shuttle

Time Period	Approximate Headway (Minutes)	Vehicles in Service	Vehicle Hours of Service (Hours)
6:30AM – 9:00AM	10	3	7.5
9:00AM – 4:30PM	30	1	7.5
4:30PM – 7:00PM	10	3	7.5
7:00PM – 8:00PM	30	1	1
Total			23.5

Columbia Heights Saturday Shuttle

9:00AM – 6:00PM	30	1	9
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Cost estimates were based on the total vehicle hours estimated above, an assumption of 252 weekday operating days/year (Monday-Friday minus 8 holidays) along with 52 weekend days.

Operating costs were estimated at \$65/vehicle hour. Total annual costs for each route are summarized with the following:

Brookland – CUA Shuttle Costs

	Daily Hours	Annual Hours	Annual Cost
Weekday	13.5	3,402	\$221,130
Weekend	-	-	-
Total	13.5	3,402	\$221,130

Columbia Heights Shuttle Costs

	Daily Hours	Annual Hours	Annual Cost
Weekday	23.5	5,922	\$384,930
Weekend	9	468	\$30,420
Total	-	6,390	\$415,350

A final aspect to the revised TMP is a phased implementation of parking in Zone A with the intention of reduced parking for certain phases. In order to ensure that parking ratios support the economic development objectives of the District of Columbia and support the planning/transportation objectives of the District, the AFRH revised the ratios for phased parking plan for Zone A.

The projected phasing of the parcels is as follows:

- Phase 1 – Parcels A, B2, C, D, H, I, K, L, and M
- Phase 2 – Parcels E, F, N, O, P, Q, S, and T
- Phase 3 – Parcels B and B1

The Zone A developer has agreed to re-evaluate parking ratios for Phases 2 and 3 in consultation with AFRH, NCPC, DDOT, and DCOP. This will occur in advance of parcel design activities for the first commercial parcel developed after Phase 1, to determine whether a further reduction or increase in parking is warranted for Phases 2 and 3, based on the following conditions:

- A premium transit service is operational within the Irving Street right-of way and directly serves the AFRH project at the time of the parking ratio’s evaluation. Premium transit means an express bus providing service which is not less than what will be available to people living and working in Zone A regarding paratransit service;
- The premium transit provider has evidence of continuous funding for that level of service;
- Market conditions support a change in the parking ratios;

- Revised parking ratios are no less than those required for other comparable development projects and no less than those required by zoning;

- An analysis is completed by DDOT, following industry standards for traffic analysis, proving a limitation of roadway capacity resulting from the AFRH Zone A development; and
- A study is completed by DCOP of the parking requirements for medical office space in the surrounding area.

An annual TMP Performance Report will be prepared by the Transportation Management Plan Coordinator (TMPC) (on-site manager) and presented to the AFRH on an annual basis. The report will evaluate the TDM strategies and will include:

- The extent to which each program has achieved its objective
- The degree of consistency of the program implementation to the plan
- Detail the relationship of different strategies to the effectiveness of the program
- Amount of square footage leased commercial/retail floor area and/or the number of occupied dwelling units and the number of employees and/or residents occupying such space
- Work program for the following year

The TMPC will use one or more of the following options to gauge the success of the programs:

- Perform annual survey to determine the number of residents/tenants/employees/ and their place of employment/residence, mode of transportation, arrival and departure times, willingness and ability to use carpooling and public transit. The survey will become the basis for the Annual Report.
- Perform traffic counts annually at all access points to the Zone A development. This can be achieved by monitoring at each access point and counting the vehicles.
- Track program participation (e.g., application of transit subsidies, preferential parking registration)

The TMPC will submit the report to the AFRH for review, and if needed, propose modifications to the TMP for the AFRH to approve as the Zone A development progresses.

The AFRH Zone TMP information indicates there are currently 298 employees working at the AFRH. Job categories include office, medical, food service, security, and maintenance workers. These employees work in three shifts, where the shifts are as follows:

- Shift 1 --- 7:30 am to 4:00 pm
- Shift 2 --- 3:30 pm to 12:00 pm
- Shift 3 --- 11:00 pm to 7:00 am

For the AFRH work activities, 221 employees work in Shift 1; 40 employees work in Shift 2; and 39 employees work in Shift 3. AFRH analysis utilized employee zip codes, work schedules, and the number of employees in each code area. The distribution of these employees is basically centered on the Greater Washington region. Of the employees, approximately 24% (70 employees) live within the District of Columbia. Excluding those employees living within District, approximately 23% (68) employees live inside the Capital beltway (I-495). The remaining

majority of employees live within approximately 5 to 10 miles outside of the Capital Beltway (I-495).

In the context of transit usage, 31 employees (11%) are currently using the MetroCheck Program. The Commission's Comprehensive Plan goal for the employee parking ratio of the AFRH Zone is 1 space for every four employees (1:4) and would equate to 75 to 80 vehicle spaces. The proposed master plan provides 80 spaces for employee use, with the balance of the parking (1,100 spaces) provided to AFRH residents and their visitors within the AFRH Zone.

Historic Resource Effects

The multiple impacts of the proposed master plan on historic resources would result in long-term, adverse, and cumulative impacts. Past projects in the vicinity of AFRH, such as the widening of North Capitol Street have adversely affected historic resources of the AFRH. When added to other past and reasonably foreseeable future actions that have altered historic properties on and in the vicinity of AFRH, the proposed master plan would contribute to long-term, major, adverse and cumulative impacts.

Some limited positive effects also derive from the master plan, most significantly, that historic structures are slated to remain. Rehabilitation and adaptive use of them is being encouraged or required by the master plan. Additional revenues to AFRH from development will allow the AFRH to be a better steward of its historic and cultural resources on the 272 acre site, which it has not been able to contemplate to any significant degree in the past, because of the real aspect of competing financial needs of its operations.

AFRH initiated and completed consultation through the National Historic Preservation Act, Section 106 process, with the DC-SHPO and the Advisory Council on Historic Preservation. As a result of this consultation, a programmatic agreement (PA) has been developed by the AFRH that identifies mitigation measures to be implemented as well as preservation design guidelines for the defined character areas in AFRH property. These design guidelines have been incorporated into the final AFRH master plan. Incorporated mitigation measures in the final PA include the following:

Specific Actions to be undertaken by AFRH-

- AFRH will retain the services of a Cultural Resources Manager (CRM) to assist AFRH in the implementation of the Historic Preservation Plan (HPP). The CRM will be retained within 12 months of NCPC's approval of AFRH final master plan.
- AFRH will plant additional trees to replace those required for the relocation of two golf holes due to the Zone A development. Trees will be replaced on a 1-to-1 basis in accordance with AFRH Treatment Recommendations for Landscape Resources.
- AFRH will develop and implement a Historic Preservation Maintenance Program (HPMP) designed to identify and prioritize the maintenance needs of the contributing historic (built, natural and designed landscape, and archeological) resources. This plan will be developed and implemented within 2 years of NCPC's approval of AFRH-W Master Plan.
- AFRH will integrate AFRH Resource Inventory/Cultural Resource Management Database into AFRH proposed Computerized Maintenance Management System (CMMS) at the time the new CMMS is brought online. It is anticipated that this system will be brought on line within 2 years.

- AFRH will develop a landscape master plan for the AFRH Zone and Zones B and C of the campus. This plan would be developed within one 1 year of the approval of AFRH master plan. Implementation of the landscape plan will begin within one 1 year of commencement of rent payments from the Zone A development.
- AFRH will complete an update to an August 2007 tree survey to include Zones B and C within 1 year of commencement of rent payments from the Zone A development.
- AFRH will complete specific landscape projects as follows:
 - a. Scott/Sheridan Promenade Project within 3 years from AFRH master plan approval,
 - b. Scott Building Tree Planting Program will be completed as part of the landscape master plan developed as noted above
- AFRH will perform a condition assessment of the historic fence along the western perimeter of the site, and perform stabilization activities. The assessment will be conducted within 2 years of AFRH master plan approval.

Specific Actions to be undertaken by the Zone A Developer-

- The developer for Zone A will rehabilitate and adaptively use, in conformance with the Secretary of Interior's Standards for Rehabilitation (36 C.F.R. 67) and its associated guidelines the following buildings in Zone A:
 - a. Barnes Building (Building 52)
 - b. Forwood Building (Building 55)
 - c. King Hall (Building 59)
 - d. Viewing Stand (Building 50)
 - e. Bandstand (Building 49)
 - f. Mess Hall (Building 57)
 - g. Mess Hall Corridor (Building 58)
 - h. Hostess House (Building 53)
 - i. Quarters 47 (Building 47)
- The developer will create a stabilization and maintenance plan of the buildings and structures listed above no later than 120 days after the effective date of the Master Lease for Zone A. Rehabilitation for these buildings and structures listed above will commence in accordance with the project schedule submitted as part of the project plans for the first non-infrastructure phase of development.
- The developer will rehabilitate historic landscape resources in Zone A:
 - a. Forwood Building Grounds to the extent grounds are located in Zone A and controlled by developer. (LaGarde and secured grounds remaining within the AFRH Zone are excluded until such time LaGarde is leased to the developer);
 - b. Pershing Drive Street Trees, south and east: Developer will preserve the historic orientation of Pershing Drive and shall preserve, to the maximum extent possible, the allee of trees bordering Pershing Drive. If it is not possible to save all the trees, the developer will replant trees of the same species, or, if not available, a similar species that resembles the vegetation, with the intent of restoring the historic allee.
 - c. Hospital Complex Quadrangle to the extent grounds are located in Zone A and controlled by developer. (LaGarde and secured grounds remaining within the AFRH Zone are excluded until such time LaGarde is leased to the developer);

d. Specimen Trees in Hospital Lawn. If it is not possible to save all trees, the developer will replant trees of the same species, or, if not available, a similar species that resembles the vegetation in an agreed upon location within the Hospital lawn; and

e. Pasture Recreation: The developer will preserve to the maximum extent possible the orientation, unaltered topography, and configuration of the Historic Pasture in Zone A. Also, historic trees in the northwest section of the pasture will be preserved to the maximum extent possible. If it is not possible to save all trees, the developer will replant trees of the same species, or, if not available, a similar species that resembles the vegetation, in an agreed upon location within the Historic Pasture.

- The developer will devise and implement an educational interpretation program including signage focusing on the history of AFRH.
- The Developer will complete a tree-planting program and the maintenance of historic trees in accordance with the approved AFRH master plan and local District of Columbia tree ordinances.

Specific Actions to be Undertaken for Zone B Development-

As a condition of development for Zone B, the selected developer will be required to complete the Restoration of historic iron fence along the western perimeter of Zone B.

Specific Actions to be Undertaken for Zone C Development-

As a condition of development for Zone C, the selected developer will be required to complete the following specific mitigations:

- Restoration of the historic iron and masonry and iron fences along the western perimeter of Zone C.
- Relocation of Community Gardens from Zone C to the AFRH Zone.
- Undertake specific landscaping to screen Quarters 90 (Randolph Street Gatehouse, Building 90) from the northernmost development on Zone C.

U.S. EPA Comment on Final EIS

The Region 3 U.S. EPA commented to the AFRH about the Final Environmental Impact Statement on December 3, 2007. The comments noted general concern and a statement about accounting for historic effects under the Section 106 process. Specifically, the following portion of the comments is noted:

Although EPA recognizes the purpose and need for the proposed project, it is not certain that the extensive degree of development proposed is justified as current use and project future use of the property is not included in the DEIS. The DEIS states that the “site is currently underutilized” but does not provide an analysis of the possible reasons for this other than the presumed assumption that this is underdeveloped open space that can be developed to support community needs/amenities as well as provide revenue. It is not apparent that the residents were poled to determine what their needs is as well as if there is the demand to occupy the site with

residents and tenants to support residential/hotel/medical/institutional/retail, etc. development that is proposed. Also, aside from the Grant Building and the King Hospital Complex, it is not certain whether other existing buildings would benefit from renovation/demolition, etc. which may then help to support and increase revenue. An

assessment and inventory of existing buildings as well as their use would provide a baseline and may serve to decrease the build alternatives which would reduce the environmental and cultural resource impacts.³

In general NCPC staff agrees with the overall tenor of the U.S. EPA observations, but does find the final master plan reduces the size of proposed development, and the commitment to adhere to a master plan and historic preservation plan (see previous pages 42 and 43), which will serve to strongly guide the planned future development of not only the AFRH controlled facilities but also the Zone A development. The historic preservation guidelines are incorporated into not only the final master plan but also the text of the NHPA Section 106 Programmatic Agreement. Moreover, the AFRH stipulates that the documents for accomplishing the Zone A land lease will prominently note the historic preservation requirements as a part of the lease conditions. Furthermore, the historic preservation plan portion of the master plan accomplishes the assessment and inventory of all existing features within the 272 acres of the AFRH. This assessment guides all aspects of the final master plan.

Monitoring or Enforcement Program

Monitoring provisions by NCPC for minor impact mitigation actions identified in this report will occur through implementation of the Commission's authority pursuant to 40 U.S.C. § 8722(a),(b)(1) and (d) in review of the all AFRH implemented construction and building or site improvements as specified by the NCPC's federal project submission requirements. NHPA, Section 106 final review compliance will be achieved by AFRH adherence to the Programmatic Agreement requirements and its conditions that must be achieved prior to submitting a final project design to the Commission.

NCPC staff recognizes that the project construction work will obtain all necessary permits for noise compliance as provided by District of Columbia noise regulations. Additionally, the Commission staff finds all transportation management issues for specific project parcel areas within Zone A must adhere, as part of the development agreement, to the conditions of the TMP submitted with the final master plan, and staff recommends to the Commission that a copy of the annual TMP status report be filed with NCPC for monitoring purposes.

Unresolved Issues

No major unresolved issues exist in relation to NEPA review issues. NCPC received no direct comments to the staff during the FEIS public review period that closed in December 2007. Public interest was expressed to NCPC staff to identify when the proposed final AFRH master plan would be presented to the Commission, and NCPC staff also was provided copies of comments directed to the AFRH. Responses from NCPC staff were provided to the public regarding the NCPC review

process with an estimated potential schedule of review, and as those possible actions related to monthly submission dates.

NCPC has carefully reviewed the issue of building height discussed in effects involving the proposed alternatives within the FEIS. NCPC staff has found the proposed building heights related within the FEIS do comport with the Zone A building heights identified by the final master plan,

³ *Region 3 US EPA letter to Mr. Joseph Woo of the AFRH. See attachments.*

specifically as it adheres to the particular number of floor levels noted for each land parcel. Effects are fully evaluated in the FEIS and are also addressed by the final Section 106 Programmatic Agreement.

A Memorandum of Understanding between the Armed Forces Retirement Home, The District of Columbia Office of Planning, and the National Capital Planning Commission has been established that provides a basis for issuance and enforcement of land use planning requirements and building code application for Zone A. The process set forth has been developed solely for the unique circumstances of the AFRH master plan where there is federal land and substantial private development on it for traditionally non-federal uses. The MOU process applies only to the land and uses that are privately developed for private purposes, and does not apply to federal buildings or federal uses at the AFRH. The specific conditions and requirements of the building code enforcement are detailed in the copy of the attached memorandum, titled Memorandum of Understanding and Statement of Land Use Review Process.

NEPA Conclusion

The analyses of the effects of the alternatives and the ability of the alternatives to satisfy the identified purpose and need for the proposal have been carefully considered. All practicable means to avoid or minimize environmental harm from the recommended proposal, Alternative 3A, are implemented in the project submission as the final master. It is therefore recommended that the Commission adopt and approve the FEIS, and that the AFRH final master plan be accepted for review and action on by the Commission.

National Historic Preservation Act (NHPA)

Master Plan Consultation

The master plan is an undertaking subject to review under both Section 106 and Section 110 of the National Historic Preservation Act.

AFRH has executed a Programmatic Agreement to document its consultation pursuant to Section 106. AFRH consulted with the DC State Historic Preservation Office (SHPO), the Advisory Council on Historic Preservation (ACHP), the staffs of NCPC and other federal and District of Columbia agencies including the National Park Service and the U.S. Commission of Fine Arts, the National Trust for Historic Preservation (which leases the Lincoln Cottage at the Home), and a plethora of parties including historic preservation organizations, neighborhood organizations and coalitions established for this purpose, District Council members, and ANC commissioners.

AFRH and its consultant team, with the General Services Administration serving as its consultant and facilitator, held consultation meetings over the course of more than a year on the plan's

development, the inventory of historic resources at the site, the identification and analysis of viewsheds to and from the site, and the identification of "character zones". The analysis of the character-defining features in each zone and throughout the site informed the development proposals. Based on the proposals reviewed by the Home, it selected a developer for Zone A. The development team then attended subsequent consultation meetings at which the proposal became the subject of further comments to minimize the adverse effects of the development to the historic

site and improve the compatibility of new construction with the buildings, built features, terrain, vistas, and landscape in Zone A.

Zones B and C were also redesigned, especially Zone C, which was reduced in density and character of development. The Home does not anticipate developing Zones B and C for some years, however, and Zones B and C are shown in the master plan at a much more schematic level than Zone A.

The remaining portions of the plan that will continue to house and serve the functions of the Home were also the subject of consultation. While the historic buildings will be preserved, some new construction is anticipated within the historic setting and is indicated in the master plan.

A Preservation Plan was written to guide the Home's activities and decisions for preservation and treatment of its contributing historic and cultural resources. The Preservation Plan accompanies the development plans so that the provisions for both objectives--preservation and development--can be assessed together. Repair and the appropriate reuse of the historic buildings will be an integral part of the master plan's development plans.

The parties representing the adjoining and nearby neighborhoods have raised several concerns, including but not limited to the illustration of any proposed development in Zone C rather than its retention as open space, the presence of the (historic) fence along the west side of the site that precludes that area from being used by the community for recreational open space, and the proposed density of development or presence of proposed development in Zone B.

The National Trust for Historic Preservation's concerns have centered on the setting around the Lincoln Cottage, the approach to the cottage from the west, the scale of possible development near the cottage, and the views and vistas through the grounds to the south. The National Park Service participated throughout the consultation (and is a signatory to the Programmatic Agreement), commenting in particular on the health and character of the tree canopy and copses and the extent to which they would be altered or might be at risk through proposed buildings and the establishment of streets within the site.

The DC SHPO has commented during the consultation meetings and the DC Historic Preservation Review Board has also advised its staff and the Home. The SHPO's recommendations have led to responses from the applicants in several areas, particularly in the reconfiguration of the wooded east side of the Home, and the relationship of proposed new streets to North Capitol Street and beyond and also viewsheds eastward across North Capitol Street. Like the Commission at the earlier stage of master plan review, the SHPO earlier expressed concern for the proposed density of development. Like the Commission, it has concurred with the Home and its team that clustering the bulk of the development in Zone A allows for both an enhanced opportunity for development as well as the potential for the most significant preservation of the historic landscape features and grounds. The SHPO has also focused on the Preservation Plan that lays out the process and

treatments for the protection of the Home's historic buildings and landscape features in the zones that will continue to serve the Home's purpose.

Programmatic Agreement

The Programmatic Agreement indicates a consensus among the signatories on the master plan's terms for protection of many historic buildings and landscape features, as well as the process for

reviewing the components of the master plan's development zones in the southern portion of the site. The signatories are the Home, the DC SHPO, the ACHP, the Commission, and the National Park Service.

Under a separate agreement between the Home, the District of Columbia Office of Planning, and the Commission, the Commission will review any changes to the master plan requiring amendment, but will not review individual private projects within the development zones. The Commission will retain its review authority for federal projects and will continue to review projects initiated by the Home. The DC SHPO will review all projects at the site (now a designated historic district of the District of Columbia) for compatibility with the historic qualities of the Home. The Programmatic Agreement includes this separate agreement and the agreed upon review procedures, as an important component of the future protection of the historic campus.

The D.C. Historic Preservation Review Board, in its role as advisor to the State Historic Preservation Officer, reviewed the final master plan at its January 24 and 31, 2008 meetings. Citizens, ANC commissioners, and representatives of organizations testified in opposition to the final plan. The DC SHPO's staff report is attached to this report. The report was endorsed by the HPRB, and the HPRB Chairman reiterated the expressed concerns of citizens that Zone C be maintained as open space and that no development be placed on the parcel.

Historic Character of the Home

The Armed Forces Retirement Home was known in the nineteenth century as the United States Military Asylum and more recently as the U.S. Soldiers' and Airmen's Home. It was established by the federal government in 1851 for veterans of the Mexican-American War. The land was purchased from George W. Riggs, who had built his home there. His house became a retreat for American presidents in the early years of the Home—most prominently by Abraham Lincoln. President and Mrs. Lincoln traveled to the Soldiers' Home regularly from the White House during his administration. The National Trust for Historic Preservation has restored and opened the Gothic Revival-style house now known as the Lincoln Cottage to the public for the interpretation of the Lincolns' years in Washington.

The site has been reduced in size since its founding; originally, land to the south of Irving Street and to the east of North Capitol Street were part of the site. The National Cemetery (to the north) was also originally part of the Home. The presence of the cemetery was meaningful to Lincoln during his stays, as were the views of the city afforded from the site's high vantage point on the escarpment. The site has continued to evolve since its founding, but its original wooded and pastoral character has been retained. As neighborhoods and institutions have grown around it, its green open space has become even more marked. The Home also continues to serve its original purpose, which is to provide a home and medical care for veterans of the Armed Forces.

The AFRH site contains overlapping historic designations. The entire site was determined eligible as a historic district for listing in the National Register of Historic Places in 1988. The earliest part of the Home (the Lincoln Cottage, and the 1854-1857 Sherman Building, Quarters #1, and Quarters #2) were designated a National Historic Landmark in 1973. In 2000, the Lincoln Cottage and its immediate setting were designated a National Monument. Most recently the D.C. Historic Preservation Review Board designated the entire Home as a District of Columbia historic district, in order to align the National Register designations with the local ones, and to accommodate the Board's review authority established in the Programmatic Agreement for the privately financed

development on the property. The historic district is a rich ensemble of buildings and landscaped settings reflecting the historic periods associated with the Home.

While there are some recent, non-contributing buildings at the site (including some that are large-scale and interrupt views within the campus) as well as parking lots and other contemporary alterations to the site, most of the buildings at the Home are contributing historic structures. In addition, the landscape, roads, trees and built features retain their historical and architectural integrity throughout much of the setting. The rare and unique vistas of the city of Washington derive from the campus's open space as well as its prominent location on the high ridge to the north of the Monumental Core.

The Home comprises a significant campus within the City of Washington. It was noted as such in the McMillan Plan. The Home appears in the 1901 maps of public reservations created to accompany the Senate Park Commission plan. It is denoted on the maps as "Grounds to which the Public has access but which were not primarily intended as Parks." Other grounds so denoted included Saint Elizabeths, the Old Naval Observatory, Reservation 13, the White House Grounds, and Gallaudet University. (On the same maps, "Public Open Space or Parks" included The National Mall, East and West Potomac Parks, Lafayette Square and the Ellipse, Rock Creek Park, and the smaller reservations within the L'Enfant City.) At the time, the Home was relatively well developed, with buildings and an extensive road system (in comparison with some other parts of the city) and was so described as such in the Commission's report. At the same time, the Home—along with parks and institutional grounds—were envisioned as comprising a linked system of open spaces that would beautify and benefit the city. The Home's historic fences have been in place since the last quarter of the nineteenth century and pre-date the McMillan Plan and in recent years has been a secure facility for its residents.

The Home, situated on the ridge above what came to be known as the McMillan Reservoir, provides a green ridgeline on the topographic bowl around the center of Washington. The Home's location north of the U.S. Capitol and its dominant topographical height provide important views of the Capitol and other landmarks such as the Washington Monument, the Shrine of the Immaculate Conception, Howard University, and the National Cathedral that are integral to the historic and open space character of the Home. Views to the Home on the ridge are also important, although the land around the site has been developed. Neighborhoods grew up around the west side of the campus in the early twentieth century, and the area to the south became a hospital center. North Capitol Street, to the east, was not extended on the axis established within the L'Enfant City. When it was extended, it crossed through the Home's original acreage. It has become a high-speed corridor, with a cloverleaf intersection at Irving Street.

Some of the vegetative buffer along North Capitol and Irving Streets has been lost; on the west side of the campus the views into the campus are screened by vegetation, although openings in the buffer provide some views, especially near the lower ponds.

Comprehensive Plan for the National Capital: Federal Elements

The submitted AFRH draft master plan is consistent with the *Comprehensive Plan for the National Capital: Federal Elements*. The *Comprehensive Plan for the National Capital: Federal Elements*

highlights that "...The availability of space at existing federal facilities (individual buildings and installations) should be monitored continually; the future development of installations should be managed and controlled through the master planning process (Federal Workplace Element, p. 36) and is being achieved by the AFRH final master plan.

At page 27 of the Comprehensive Plan, the identification of federal facilities within the District of Columbia, has specified the location of the AFRH as a federally owned workplace location. Additionally, an important component in the direction of federal facility planning in cooperation with communities is emphasized at page 47 of the Comprehensive Plan that states..."federal agencies should incorporate into federal workplaces uses that would be valuable to the community. Federal agencies should consider incorporating publicly accessible mixed uses, including shopping, dining, entertainment, and residential, into their workplaces... Where facilities are built within urban environments, they should not only be compatible with pedestrian activity and be oriented toward public transportation; they should also contribute to the pedestrian street life and use of public transportation.

Wherever operationally appropriate and economically prudent, federal agencies should utilize and maintain federal activities in historic properties and districts, especially those located in downtown Washington and in the District of Columbia's and the region's secondary employment centers.

The current proposal maintains these goals. Furthermore, the *Comprehensive Plan for the National Capital: Federal Elements* includes the following policy:

Guide the long-range development for all installations on which more than one principal building, structure, or activity is located or proposed through a master plan.

- The characteristics of the installation and its surroundings should be established through the master planning process as required by the Commission. Characteristics include the qualities and resources to be protected; building groupings, massing, and architectural character; and streetscape and landscape elements and character.
- Agencies should review master plans on a periodic basis to ensure that both inventory material and development proposals are current. Such reviews should be conducted at least every five years. Agencies should advise the Commission of the results of such reviews and provide to the Commission a proposed schedule for revising master plans when updating is determined to be needed. Revisions to master plans should reflect changed conditions and provide an up-to-date plan for the development of the installation.

(Federal Workplace Element, Development of Workplaces with Communities Policies-Coordination with the Community, Policy #10)

Transportation management planning objectives, as cited in the *Comprehensive Plan for the National Capital: Federal Elements* include the following policies:

Federal agencies should:

1. Prepare Transportation Management Plans (TMPs) to encourage employee commuting by modes other than the single-occupant vehicle.
2. Develop TMPs that explore methods and strategies to meet prescribed parking ratios, and include a thorough rationale and technical analysis in support of all TMP findings.

3. Analyze scenarios that incorporate data on employee home zip codes, nearby bus routes, Metrorail, MARC, and VRE lines and their schedules, and that identify existing and planned HOV lanes.
4. Include, within TMPs, implementation plans with timetables outlining each agency's commitment to reaching TMP goals.
5. Reflect, within TMPs, planned regional transportation infrastructure or service improvements within five miles of the federal facilities.

(Federal Transportation Element, Transportation Management Plans, p. 87)

A specific and important policy applicable to the submission is cited in the *Parks and Open Space Element* of the Comprehensive Plan, which states:

Conserve portions of military reservations that add significantly to the inventory of park, open space, and natural areas and should, to the extent practicable, be used by the public for recreation. Examples include Andrews Air Force Base, Fort Belvoir, U.S. Soldiers' and Airmen's Home....

(Federal Parks and Open Space Element, Preservation and Maintenance Policies, p. 104)

Federal Capital Improvements Program

The 2008-2013 FCIP was adopted September 2007 and included projects that, although anticipated by the submission, are not specifically noted in the master plan, but were submitted to NCPC for FCIP program review. The review and indicated recommendation of the adopted FCIP analysis included:

- Construct Long Term Care Building
Recommended
\$24,600,000 (estimated total project cost). This project constructs a new 78,000 square feet Long Term Care Building to house 80 health care rooms with health care support space such as therapy, rehabilitation, education, etc.

It is noted in the FCIP that the project identified is funded primarily from interest and income from the AFRH Trust Fund, not funds appropriated by the federal government.

APPENDIX A

ARMED FORCES HOME FORM BASED STANDARDS

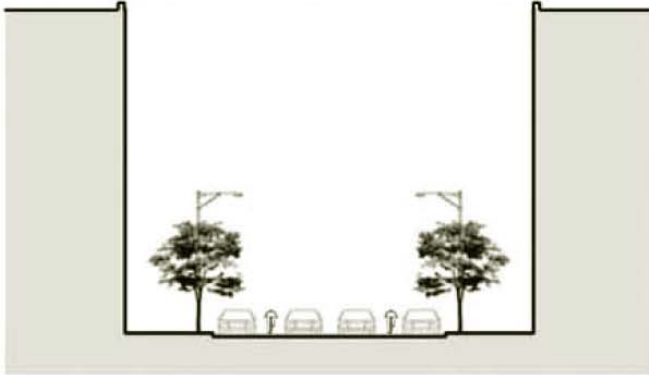
Primary Streets

Type 1A-1: Shared bike lane (44'-0", 76'-0" ROW)

Type 1A-2: See plan dimensions below,
Dedicated bike lane (48'-0", 80'-0" ROW)

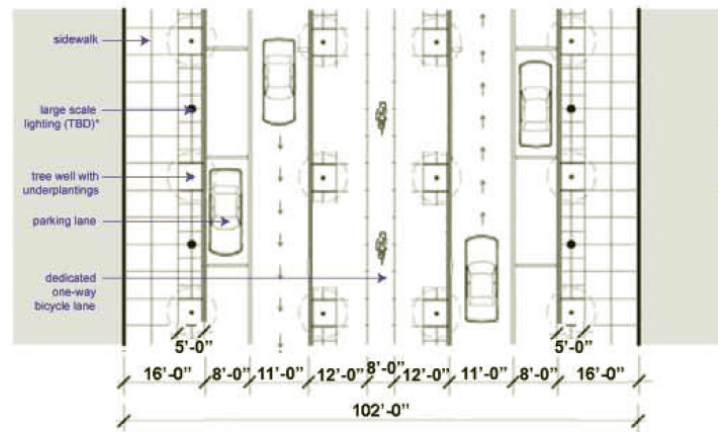
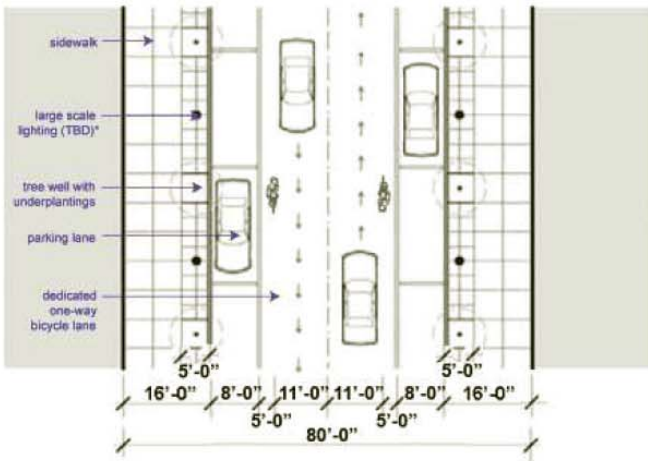
Type 1A-3: no bike lane, (38'-0", 70'-0" ROW)

Parcel boundaries for Parcels E and F extend to center of the street.



Type 1B-1: See plan dimensions below,

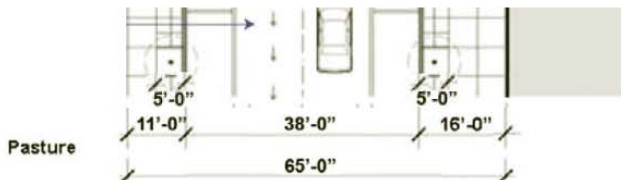
Dedicated bike lane (70'-0", 102'-0" ROW)



Type 1A - Pasture Streets

Type 1A-4: Shared bike lane (44'-0", 71'-0" ROW)

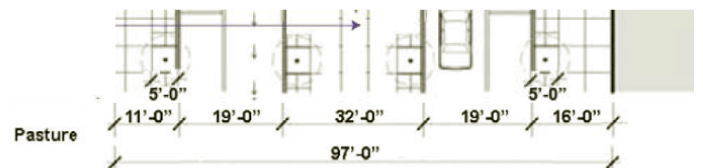
Type 1A-5: See dimensions below, No bike lane (48'-0", 65'-0" ROW)



Type 1B - Pershing Drive to Pasture

Type 1B-2: See plan dimensions below,

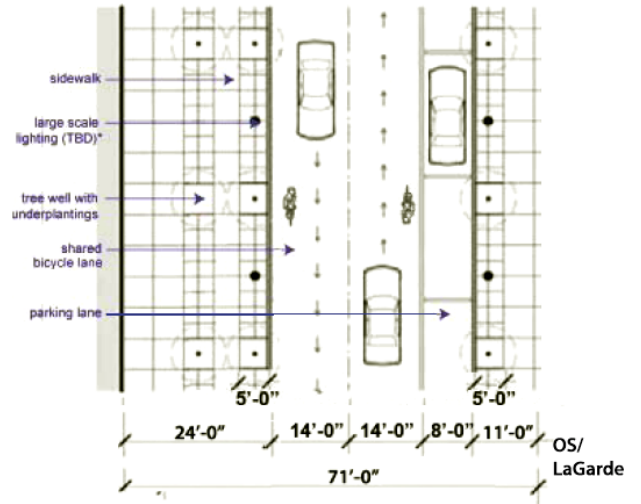
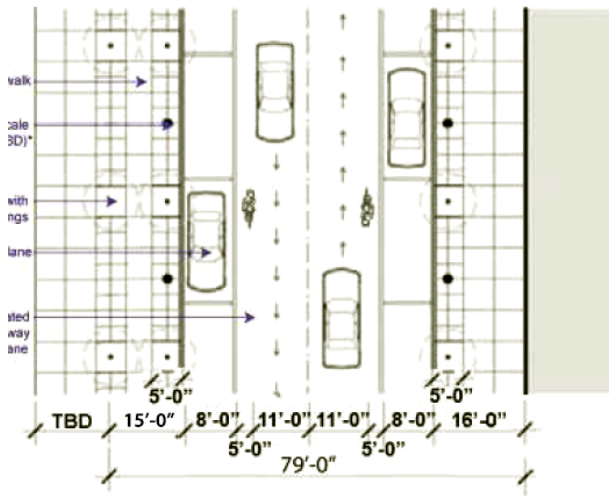
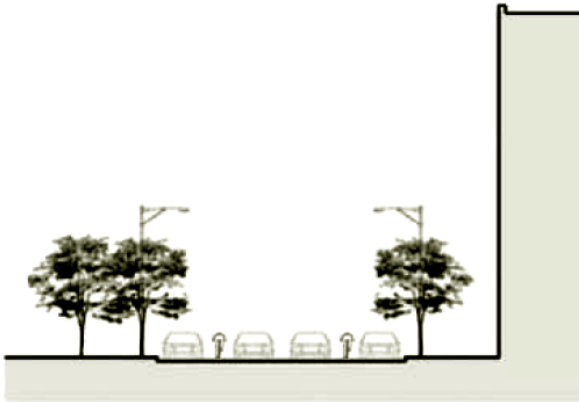
Dedicated bike lane (70'-0", 97'-0" ROW)



Type 1C - Landscape Corridors

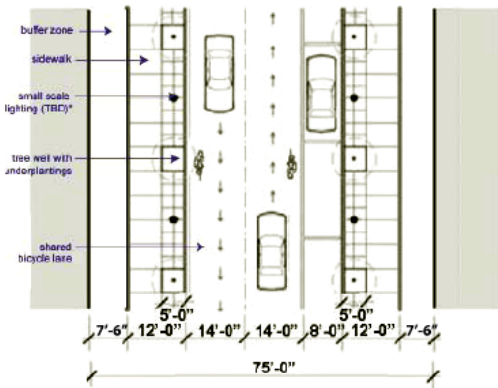
Type 1C-1: See plan dimensions below,
Dedicated bike lane (48'-0", 79'-0" ROW)

Type 1C-2: See plan dimensions below,
Shared bike lane (36'-0", 71'-0" ROW)



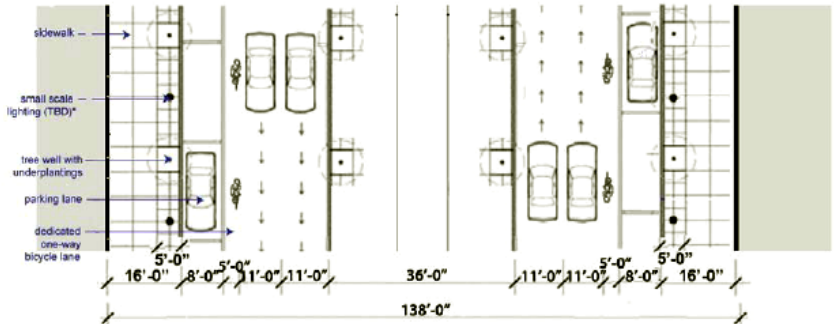
Type 2A - Secondary Streets

See plan dimensions below,
Dedicated bike lane (60'-0", 75'-0" ROW)



Eastern Entrance

See plan dimensions below,
Dedicated bike lane (106'-0", 136'-0" ROW)

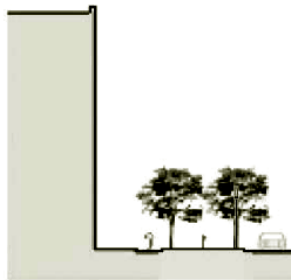


D, E, F, and P) shall be built to the parcel edge at all corners for at least 40 feet as shown below.

Buildings fronting on Irving Street and North Capitol Street are required to be setback by a minimum of 37 feet from the site boundaries, except at parcel F where the setback is required to be a minimum of 18 feet. Articulations of and creative variations in the street façade are allowed to encourage an inviting appearance.

Larger buildings types, if deemed a functional necessity in such locations, shall not have massive floor plates such as the buildings seen to the south and east of the campus. Large building types shall not be monolithic in their façade treatment but shall have vertical changes in their massing and/or façade treatment, and their upper floors shall be set back with respect to their main body envelope so as to be compatible with the scale of adjacent existing buildings.

Bike Path** - Irving Street



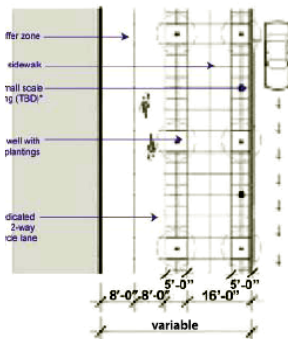
Parcel Plan and Build to Criteria

All building parcels will be located to frame and delineate the open spaces within this zone. The size and dimensions of the parcels ensure that incremental and phased development can occur on the site.

Building parcels will be limited by views, contributing buildings, and historic open spaces.

Parcels along North Capitol Street and the Pasture shall accommodate residential and commercial building types and

edges. All other building façades (excluding parcels B1, C,



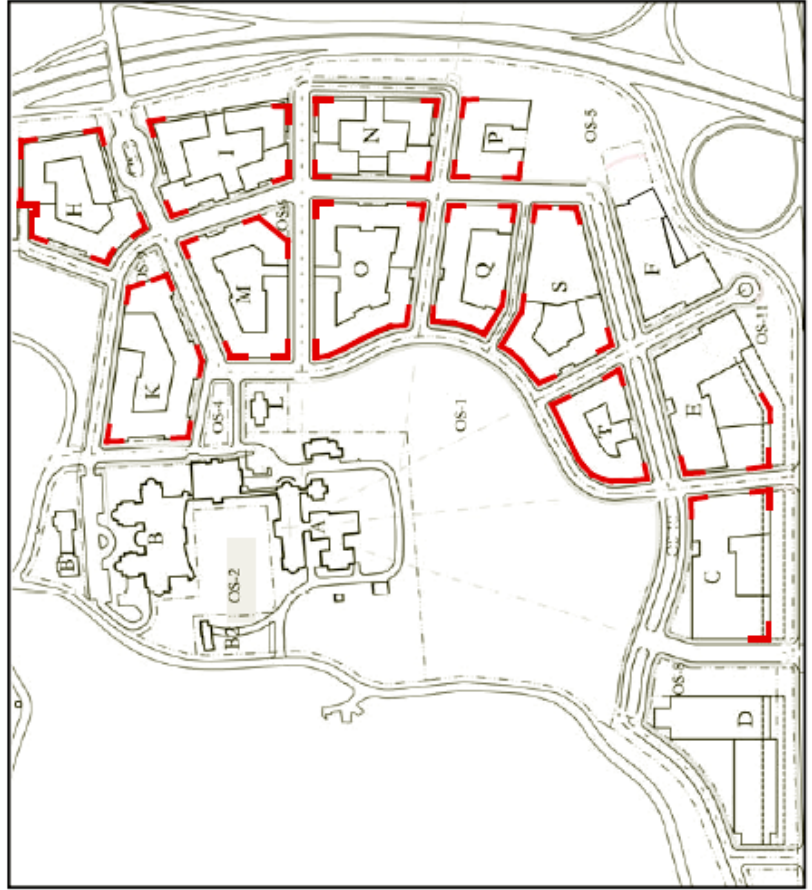
ARMED FORCES HOME FORM BASED STANDARDS



Potential layout of new development
 - Plan is for illustrative purposes only.

Criteria

The buildings fronting North Capitol Street are required to have an overall height of no more than 85 feet Streetwall



Limit
 (a) E
 (b) 1
 Development Area
 Parcel plan

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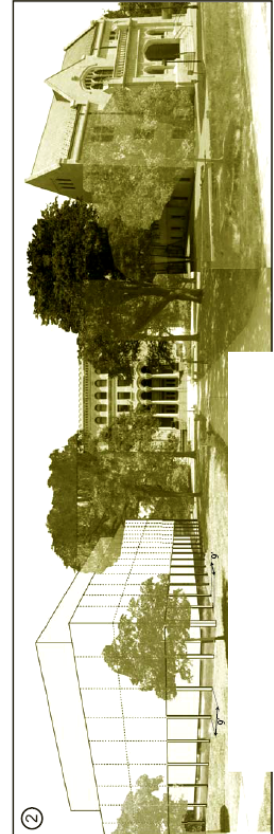
Northern Development Site-
Former Sheridan Building (demolished)



1931 Aerial photograph with proposal for new building location to reestablish court



View looking toward Grant Building with demolished Sheridan Building



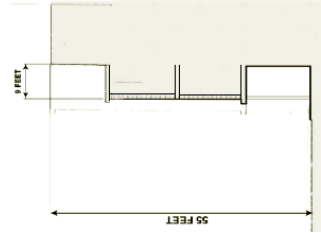
View foot

building

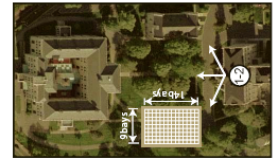
Massing

The size of a new building on the site of the Sheridan Building (demolished) shall be the same as the original building (81 feet wide by 126 feet deep). The new building shall reflect the proportions of the original building which was 9 bays wide and 14 bays deep. Proportions of the wall openings shall reflect the porous nature of the original while still fitting within the fenestration guidelines on the following pages.

The height of the building shall not exceed 55 feet and a setback of at least 8 feet shall be incorporated on all sides of the top and bottom floors.

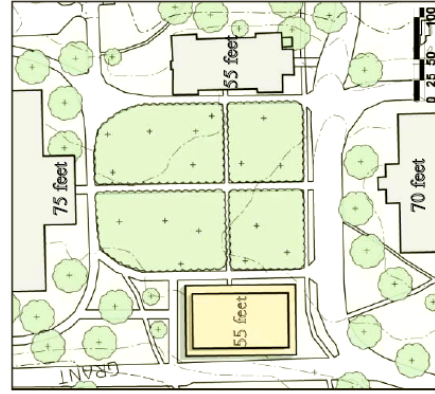


Streetwall section



Streetwall and Quadrangle

The siting of the demolished Sheridan Building helped to frame an open space, or quadrangle, in front of the Grant Building. The replacement building shall do the same. At pedestrian level, the framing of the quadrangle will be governed by the height, length, and the location of the streetwall that fronts directly onto the open space, as well as the building's height. Streetwalls are defined in height and in length to ensure an appropriate scale for buildings around the open spaces. A building on the site of the former Sheridan Building will serve the frontage of the quadrangle and its overhanging roof will provide a weather sheltered pedestrian path around the perimeter of the building.



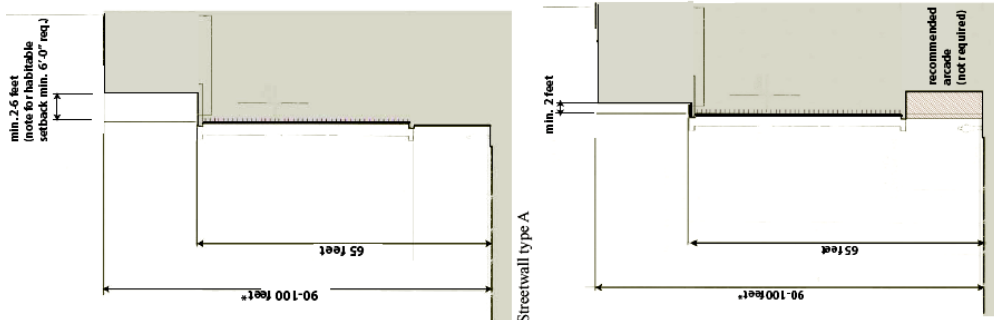
Potential layout of new development - Plan is for illustrative purposes only.

ARMED FORCES HOME FORM BASED STANDARDS

Streetwalls (Zone A)

At pedestrian level, the framing of open spaces is governed by the height, length, and location of the street wall that fronts directly onto the open space more than by overall building heights. Streetwalls around all the open spaces are, therefore, defined in height and in length to ensure an appropriate scale for buildings around the open spaces.

The streetwalls fronting North Capitol and Irving Streets ideally are to be located at parcel build-to lines. Streetwalls shall not exceed 320 feet in continuous length along North Capitol and 200 feet along Irving Streets without a break in plane. It is recommended that buildings be built to the corner of parcels as illustrated on page 97.



Streetwall type B

* Buildings labeled 90/100 feet designate an allowable height of 90 feet for residential development and 100 feet for a combination of residential and commercial development. These buildings are not to exceed 8 stories.

Streetwall Type A - North Capitol Street

Streetwall Type A was developed to form an extension of the streetwalls of North Capitol Streets onto the site. This streetwall shall maintain the scale, material, heights, setbacks and overall architectural identity of the facades of Zone A.

Streetwall Type A has an overall height limit of 90 feet for residential buildings and 100 feet for commercial/residential buildings (and cannot exceed 8 stories).

In order to give specific and clear definition to the space of North Capitol Street, this streetwall shall have a continuous expression and setback line at approximately 65 feet above ground level. There shall be two horizontal expression lines within the street-wall, giving definition to the ground level and upper zones of the streetwall. A continuous ground level datum, approximately two stories in height is required. The solid-to-void requirements similarly will ensure that the character of the streetwall will be consistent with the existing buildings.

Streetwall Type B - Interior Blocks of Zone A

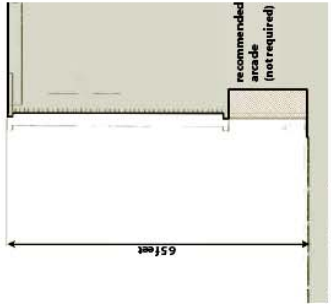
Streetwall Type B was developed to form an transition from the streetwalls along North Capitol Street (Streetwall Type A) into the center of the site. This streetwall shall maintain the scale, material, heights, setbacks and overall architectural identity of the facades of Zone A.

Streetwall Type B has an overall height limit of 90 feet for residential buildings and 100 feet for commercial/residential buildings (and cannot exceed 8 stories).

In order to give specific and clear definition to the space of Zone A, this streetwall shall have a continuous expression and setback line at approximately 65 feet above ground level. There shall be two additional horizontal expression lines within the streetwall, giving additional definition to the ground level and upper zones of the streetwall. A ground level setback could allow for a pedestrian arcade along interior blocks. The solid-to-void requirements similarly will ensure that the character of the streetwall will be consistent with the existing buildings.

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Streetwall Type C - View Corridors and Pasture Adjacencies

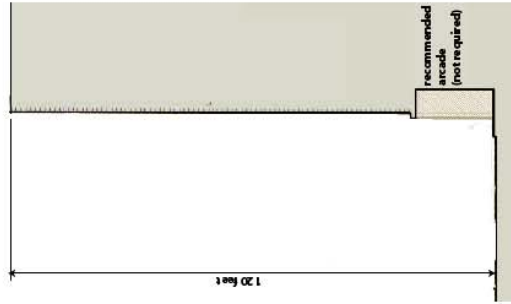


Streetwall Type C was developed to form an extension of the streetwalls of the interior blocks onto the site while accommodating view corridors. This streetwall shall maintain the scale, material, setbacks, and overall architectural identity of the facades of Zone A.

Streetwall Type C has an overall height limit of 65 feet.

In order to give specific and clear definition to the space of Irving Street, this streetwall shall have a horizontal expression lines within the streetwall that shall create a continuous ground level datum, approximately 2 stories in height. A ground level setback could allow for a pedestrian arcade along interior blocks. The solid-to-void requirements similarly will ensure that the character of the streetwall will be consistent with the existing buildings.

Streetwall Type D - Parcels F and E (eastern portion only)



Streetwall Type D was developed to form an extension of the streetwalls of Irving Street onto the site. This streetwall shall maintain the scale, material, heights, setbacks and overall architectural identity of the facades.

Streetwall Type D has an overall height limit of 120 feet (and cannot exceed 8 stories).

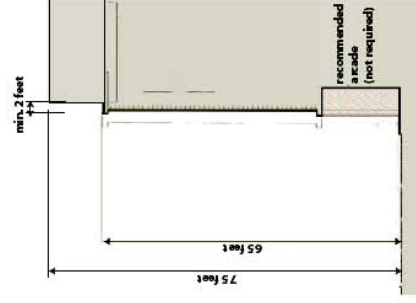
In order to give specific and clear definition to the space of Irving Street, this streetwall shall have a horizontal expression lines within the streetwall that shall create a continuous ground level datum, approximately 2 stories in height. A ground level setback could allow for a pedestrian arcade along interior blocks. The solid-to-void requirements similarly will ensure that the character of the streetwall will be consistent with the existing buildings.

Streetwall Type E - Parcel D (western portion only)

Streetwall Type E was developed to form an extension of the streetwalls of Irving Street onto the site. This streetwall shall maintain the scale, material, setbacks, and overall architectural identity of the facades of Zone A.

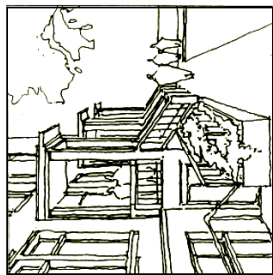
Streetwall Type E has an overall height limit of 75 feet.

In order to give specific and clear definition to the space of Zone A, this streetwall shall have a continuous expression and setback line at approximately 65 feet above ground level. There shall be two additional horizontal expression lines within the streetwall, giving additional definition to the ground level and upper zones of the streetwall. A ground level setback could allow for a pedestrian arcade along interior blocks. The solid-to-void requirements similarly will ensure that the character of the streetwall will be consistent with the existing buildings.

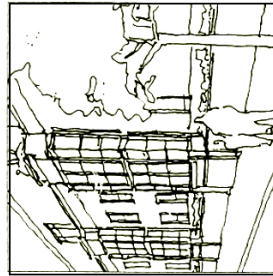


Streetwall type E

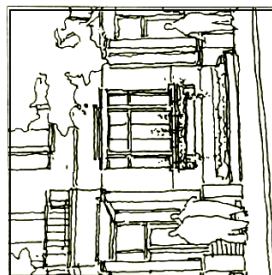
ARMED FORCES HOME FORM BASED STANDARDS



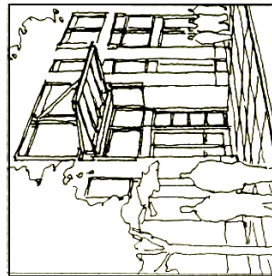
Residential entrances



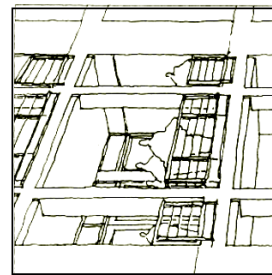
Bay windows, appurtenances, and terraces



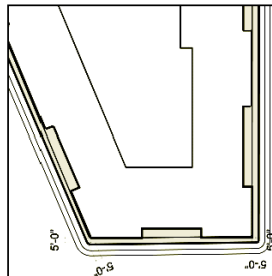
Ground level window sills, raised above people in the street



Commercial entries



Balconies and terraces



Maximum offset for architectural features outside of streetwall

Architectural Features

Architectural features in Zone A are defined as elements that add to the character and appearance of buildings and project past the streetwall by no more than 5 feet. Some elements may be used to provide amenity and privacy for the residents, whereas others may be simply for the enrichment of the streetscape. These are, therefore, left to the discretion of individual architects. The guidelines ensure that, where such elements are provided, they will be effective.

Residential Streetwalls - Building Entrances

Building entrances are defined where planting or a setback zone is incorporated into the building frontage design. This setback zone can accommodate entry steps or platforms. Shelter roofs shall not project over sidewalks.

Residential Streetwalls - Ground Floor Windows

Ground floor windows adjacent to sidewalks, pedestrian paths or along open setback areas adjacent to such pavements must be designed to ensure privacy within the dwelling. Sill heights relative to exterior grade are to be set above eye level, unless fronting onto private areas.

Residential Streetwalls - Balconies and Terraces

Although not required, terraces and balconies are encouraged in all residential buildings. Terraces at ground level must be screened for privacy. Balconies and terraces above ground level shall be contained within the building volume and, to ensure usefulness, shall have a minimum depth of 5 feet and a minimum width of 8 feet.

All Streetwalls - Bay Windows, Appurtenances, and Terraces

All bay windows, appurtenances, and terraces that project past the parcel boundary must be more than a single story in height.

Commercial Streetwalls - Entries

Main building entries shall enter from the open space defined by the building.

Canopies are defined as building entry shelters that project out over sidewalks and allow protected passage from the curbside to building entrance doors. Within the design intentions at AFRH-W, canopies are considered appropriate and permitted, but not required, at building entrances.

Foundations

Exposed foundations are not encouraged. Buildings shall utilize finished materials to grade level.

Roofs

Flat roofs are acceptable. Slate, tile, and/or standing seam metal roofing, and green roofs are highly recommended.

Mechanical Penthouses

Building designs shall provide most MEP equipment in service basements and within the building envelope, with limited roof top elevator overruns, air handlers, condensers, and antennae on the roof. Mechanical penthouses and roof top equipment are permitted and shall be designed as an extension of the building fabric, employing building materials and design treatments consistent and/or compatible with the exterior facades of the building. Mechanical penthouses and roof top equipment shall be located in the center of the building footprint, and be screened from view. Penthouses shall have a maximum height of 16-18 feet, preferably shorter, and utilize new technologies to reduce mechanical equipment size and space. All equipment shall be set back from the building façade a distance equal to or greater than the penthouse height or, wherever possible, twice the equipment height.

APPENDIX B

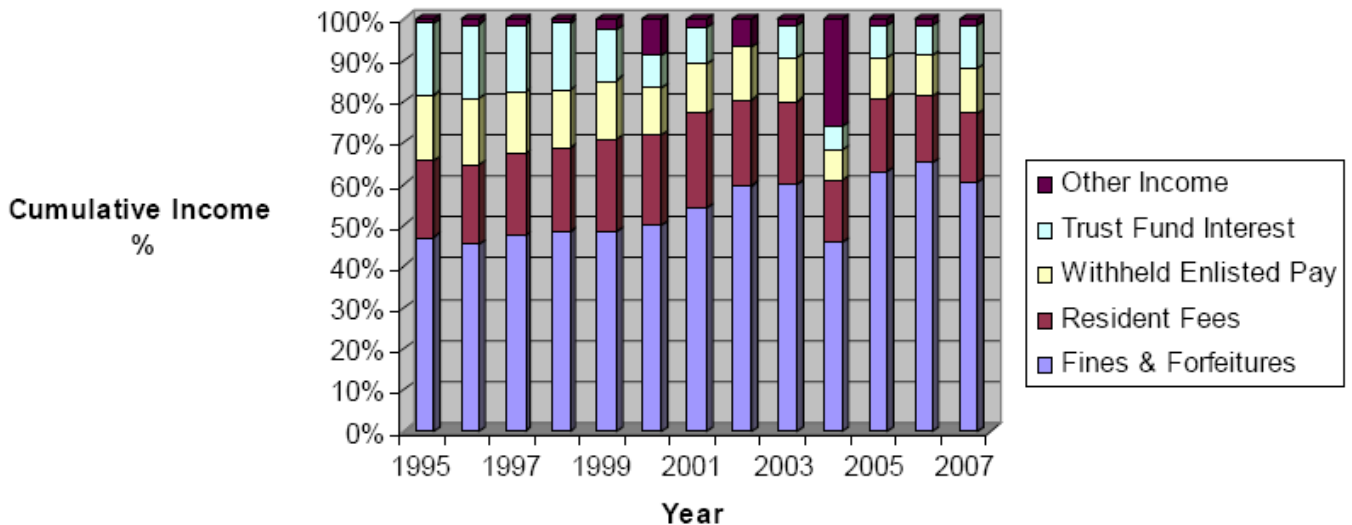
AFRH is an independent federal agency under the jurisdiction of the Secretary of Defense. AFRH relies upon its Trust Fund for operations, maintenance and construction of equipment and buildings. It receives no annual appropriation from Congress.

AFRH operates under several financial constraints. The Trust Fund is financed with a 50 cent payroll deduction from active duty military, fines and forfeitures from military disciplinary actions (which vary depending upon operational tempo), fees from residents which are capped at 35 percent of income (less than 1/2 of residents pay the maximum) and interest income. AFRH is restricted by law to investments in low-yield Treasury bonds. In addition, federal law prohibits AFRH from soliciting contributions, applying for grants, or running capital fundraising campaigns. In addition to the structural constraints of its funding sources, in the past AFRH's finances suffered from wasteful spending and inefficient management, circumstances that were exacerbated by the

increasing costs of maintaining over 100 buildings on the site. The AFRH Trust Fund fell from \$156 million to \$94 million in the period of 1995 - 2003, as previous administrators spent down the Trust Fund to pay for operational expenses. This pattern of spending put the institution in jeopardy. To address this problem, Congress passed reform legislation in 2002 that directed the Defense Department to hire professional managers with experience in retirement communities to run the institution and bring costs under control and authorized the sale or lease of assets to generate revenue.

Sources of AFRH funds are described above. Currently, AFRH's largest source of income is the income gained from fines and forfeitures.

Relative Proportions of AFRH Income Sources



Historically, fines and forfeitures have been approximately 30-40 percent of AFRH's income. However, for the period 2003 - 2007, due to the wartime increase in military operations, income from fines and forfeitures has averaged over 60 percent of the total income. Thus, the largest percentage of AFRH's income is its most variable. Income from fines and forfeitures nearly doubled from 1995 to 2006, from \$23million to \$45 million, but is not a sustainable long-term trend. The other three major sources of AFRH's income (50 cent withholding, Trust fund interest, and resident fees) are relatively static, and will not increase significantly.⁴

AFRH has taken various actions to improve its fiscal condition. Since 2003, the administration reduced the operating budget by cutting staff from 736 to 298, brought both campuses (Washington and Gulfport) under single management, outsourced many non-core services from transportation to security on performance-based contracts, and closed many buildings as it consolidated operations. This has helped to stabilize the Trust Fund, but has not address the long term revenue-generation needs of the institution. In addition, the temporary closure of the Gulfport

⁴ Information for this text obtained from AFRH Record of Decision, Dated February 26, 2008.

campus has reduced operating expenses and helped AFRH to rebuild the Trust Fund. However, the largest single reason for the recovery of the Trust Fund has been the surge in fines and forfeitures, which is an unsustainable long-term trend. The Trust Fund balance has returned to close to 1995 - 1999 levels in 2007.

In late 2006, AFRH completed a detailed facilities assessment that identified \$366 million in deferred maintenance and required capital improvements needing funding over the next 10 years. This includes items such as new roofs, new HVAC equipment, and replacement infrastructure. In addition to these specifically identified deferred maintenance and required capital replacement needs, AFRH needs in its future planning approximately \$5.5 million for a new dementia center. The AFRH identifies an increasing amount of operations and maintenance funding to maintain aged infrastructure. Given that the Trust Fund balance stood at approximately \$159 million at the end of FY 2007, the known capital requirement cited represents a significant challenge.

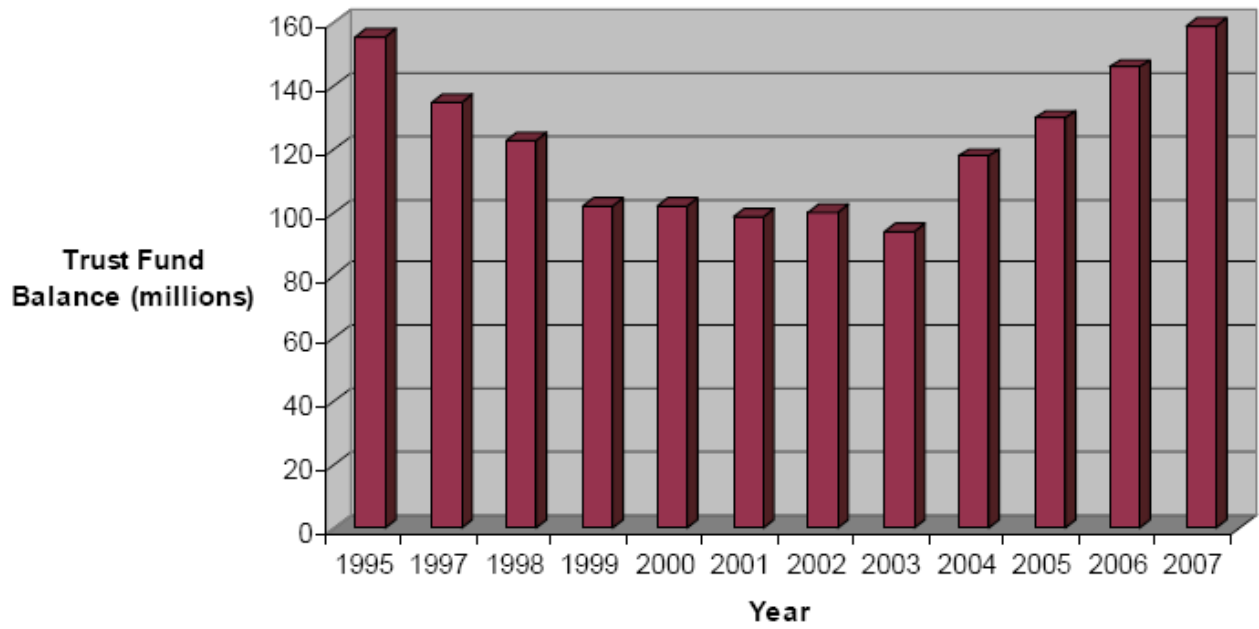
In addition to maintaining its current facilities, AFRH must begin to plan for the next generation of veteran residents. The AFRH is beginning to see that residents are living longer and becoming more frail and sicker. AFRH needs new facilities in the short-term to cope with the changing health care requirements of its residents. Additionally, as the current generation of all-volunteer active-duty soldiers reaches retirement age, AFRH anticipates increased demand for housing and specialized services prompting the need for different facilities than the Home currently has. Also, studies are proving new veterans demonstrate injuries which would have been deemed non-survivable injuries in previous wars and with high levels of Post Traumatic Stress Syndrome affecting a broader range of veterans. These residents will require more specialized care and facilities. Thus, AFRH will need to undertake major refurbishments of a number of its facilities to meet the changing future needs of its residents.

AFRH ultimately requires significant funds and a reliable income stream to build new facilities to meet the changing needs of future residents and to maintain and modernize its existing facilities. Initially, AFRH plans to ground lease Zone A and generate revenue for the Trust Fund. The full development of Zone A is expected to take approximately 15 years. At that time, AFRH will have a much firmer picture of the revenue from that development, and will be in a position to determine if development of Zones B and/or C would be required to support AFRH's ongoing capital needs.

At the present, in the absence of completed negotiations with the selected developer for Zone A, the AFRH finds it can only estimate the amount of income that the Zone A development will generate. Even once an agreement is reached, fluctuations in the real estate market will bear on the timing and amount of revenue that may be generated.

AFRH anticipates that the Zone A development will provide income to make substantial progress toward meeting at least its near term deferred maintenance and capital needs. Based on comparables, Zone A, developed with the program shown in the master plan could generate approximately \$215 million in today's dollars, structured as a ground lease, and AFRH would receive this rent over the 60-year term of the lease.

AFRH Trust Fund Balance



ATTACHMENTS ON FOLLOWING PAGES