

STAFF RECOMMENDATION



NCPC File No. MP060

ARMED FORCES RETIREMENT HOME
DRAFT MASTER PLAN
Rock Creek Church Road and Upshur Street, NW
Washington, D.C.

Submitted by the Armed Forces Retirement Home

January 27, 2006

Abstract

The Armed Forces Retirement Home (AFRH) has submitted a draft master plan for the AFRH campus in Washington, D.C. for Commission review and comment. AFRH proposes additional mixed-use development on the campus which could include residential, office, research and development, institutional, medical, retail, hotel and embassies uses through privately leasing portions of this federally owned site. The submission outlines a general development framework of land-uses, open spaces and densities within different sub areas of the campus. AFRH seeks Commission comment on the development framework, which will guide the preparation of a final master plan submission that will be brought to the Commission for approval in fall 2006.

Commission Action Requested by Applicant

Approval of comments on draft master plan pursuant to 40 U.S.C. § 8722(b)(1) and (d)).

Executive Director's Recommendation

The Commission provides the following comments:

- Reduce the total amount of proposed development. The Commission does 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 and consistent with comparable local zoning districts.
 - Staff's review of existing development in the surrounding area and of comparable zoning districts in the city indicates that building heights in Zones 3 and 4 should not exceed 65 feet, and a minimum open space buffer of between 50 and 100 feet should be maintained along the exterior boundaries of these zones.

- Refine development guidelines within the historic western view corridor, which lies within these zones and within the view corridor east of Irving Street **Gate** in Zone 4 reflecting the recommendations of the National Historic Preservation Act, Section 106 process.
 - Revise maximum building heights in Zone 1A to ensure consistency with the plan's designation of this zone as suitable for "small structures" flanking "the green space in front of the Grant Building." Development guidelines currently indicate that there will be minimal development in Zone 1A but also state that new construction may be up to 55 feet in height, which exceeds the definition of "small structures." Revise and expand upon guidelines for new development in this area through the Section 106 consultation process.
 - Revise maximum building heights in Zone 1B so that they do not exceed the height of the Sheridan Building.
- Limit new development in Zone 2 to Zone 2B, and minimize impacts to the existing tree canopy in Zones 2A and 2C.
 - Provide within the plan for Zones 3 and 4 a well-defined publicly accessible recreational open space component that reflects the input from NCPC staff and members of the local community.
 - Submit a revised plan and development framework guidelines for Zones 5 and 6 that respond to comments received through consultation under the National Historic Preservation Act. To the extent practicable, conserve a portion of the area for use by the public for recreation, in accordance with the Comprehensive Plan for the National Capital. Preserve the viewsheds of the National Historic Landmark of the AFRH pursuant to the Secretary's standards and Section 110 of the National Historic Preservation Act, better define the historic attributes to be preserved, and specify the amount, location and nature of proposed open space in these zones.
 - Revise proposed building heights in Zones 5 and 6 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.

* * *

PROJECT DESCRIPTION

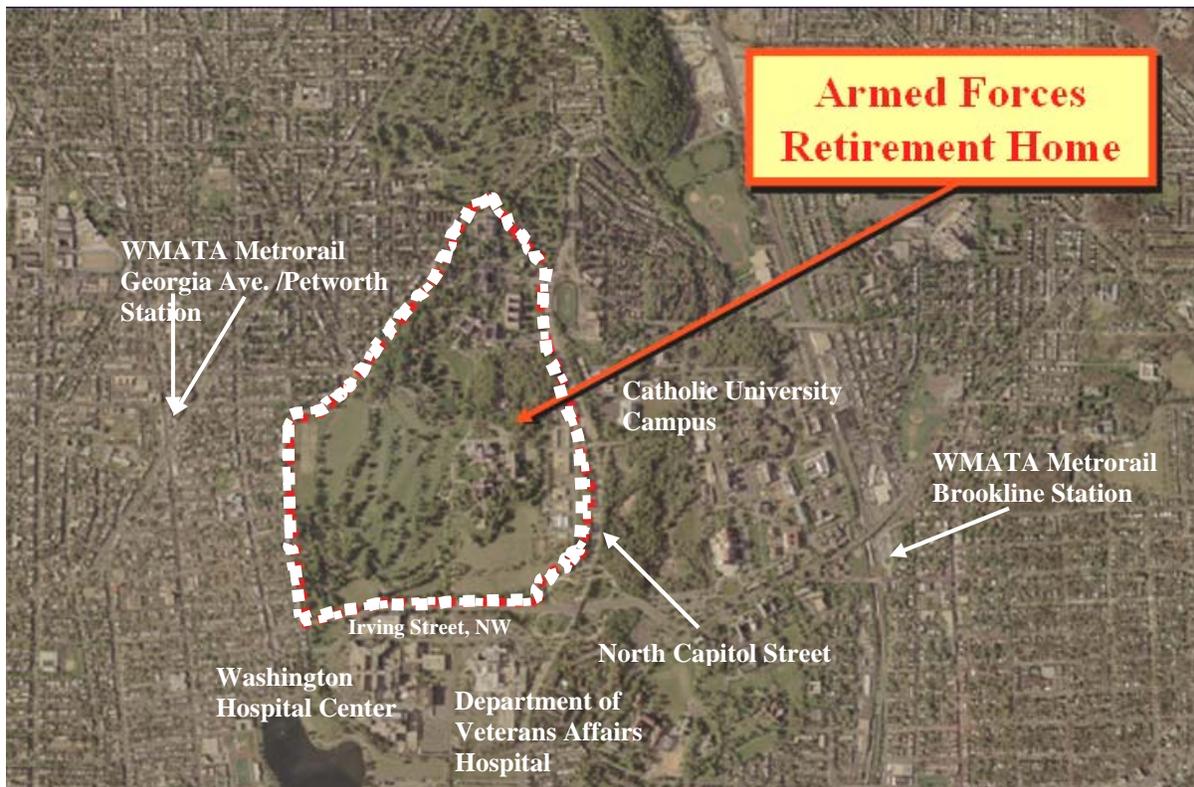
The Armed Forces Retirement Home (AFRH) has submitted to the Commission a draft master plan for comment. Because this is only an early draft, additional iterations including a final plan will be subsequently submitted by AFRH to the Commission for approval.

The draft version of the proposal indicates planning factors and directions for development of 138 acres of its existing 272-acre AFRH campus, which presently supports more than 100 buildings and ancillary structures. The current facility serves approximately 1,400 military veterans with support features such as health-related operations and services, private rooms, banks, 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.

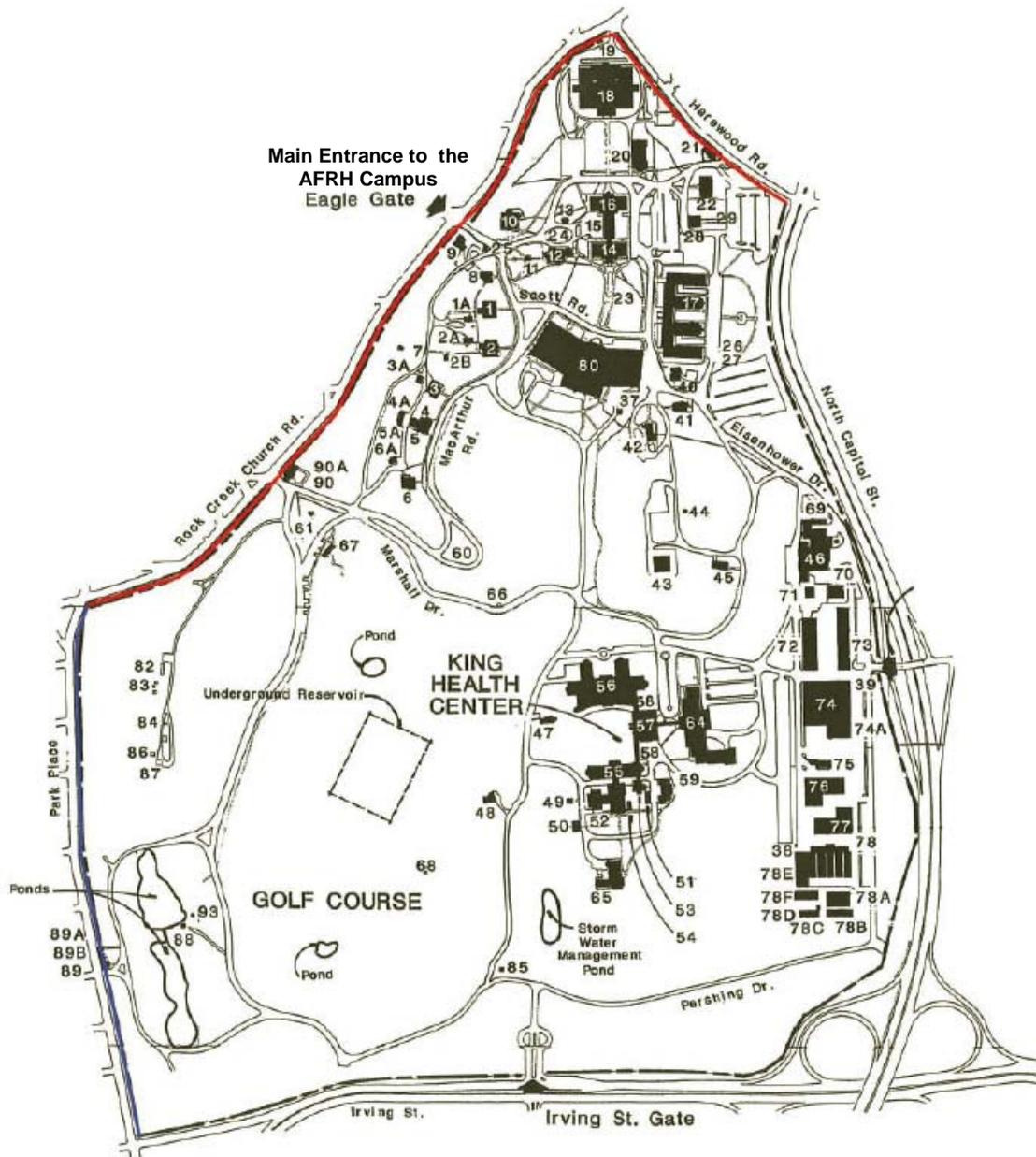
The preferred direction of the AFRH management, after additional study, was to implement development of the property through leasing much of the property for private development. To achieve this, and also fully plan and control the direction of development, the AFRH is updating its master plan to ensure the future development does not adversely impact the current property, its historic character, its important veteran functions, or be detrimental to the nearby community.



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 retirement home and administrative facilities occupied by AFRH 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. Several of these structures are vacant, most notably the Grant and Security Buildings. The National Trust for Historic Preservation is currently renovating the Lincoln Cottage and the Administration Building for a museum and visitor center.

The preferred development option, as defined by AFRH, is a mixed-use development for the AFRH site with a potential range of uses encompassing residential, office, research and development, institutional, medical, retail, hotel and possibly an embassy diplomatic area.



EXISTING ARMED FORCES RETIREMENT HOME BUILDING LOCATIONS 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

BUILDING SCHEDULE (CONTINUED)

Contributing	Non-Contributing
49 Bandstand	78A Greenhouse
50 Carport	78B Greenhouse
52 Barnes Building	78C Greenhouse
53 Hostess House	78D Greenhouse Storage
55 Forwood Building	78E Greenhouse
57 Mess Hall	78F 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 Slurry 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 6 ———	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 submitted draft plan also allows for new AFRH facilities, as needed in the future, although the specific use of the facilities is not determined. Most of the uses proposed for the various development zones will not be constructed by AFRH but by private sector and/or other institutional entities. Development of these uses 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 last four years, the

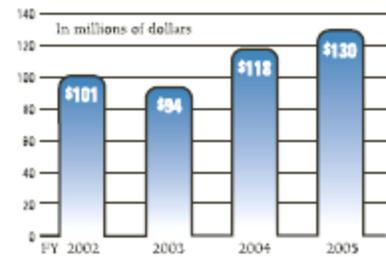
Trust Fund and incoming revenue have varied as indicated.

The plan proposes possible new construction within the property, 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:

- Maximize 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;
- Integrate the landscape and the built form;
- Respect the character of the adjacent communities and integrate the new development into the city fabric;
- Allow flexibility through the structure of the plan

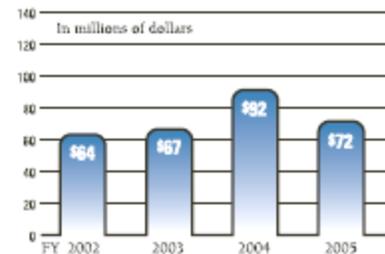
The development sections of the plan establish six zones where expansion would occur. Each of these zones has its own character informed by existing site and building conditions and the adjacent city neighborhoods. Each zone maintains a design framework (see Appendix A: AFRH Proposed Development Guidelines) that will define the physical design of development within the zone. The design framework defines the primary use patterns, historic features, views, development sub zones, open space, streets and streetscapes, access and parking, and built form (building heights, density, set back requirements).

AFRH Trust Fund Balance



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

Revenue



FY 2005 Goal: a 20-30% reduction in costs (from FY 2003).

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

Background

Previous Commission actions involving the AFRH campus installation 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
- On July 30, 1987, the Commission approved the preliminary and final site and building plans for the renovation of the Scott Building, as shown on NCPC Map File No. 12.10(38.00)-29941.
- On October 6, 1988, the Commission approved the subarea plan of the King Health Center for the Home, as shown on NCPC Map File No. 12.10(05.12)-30115 and the preliminary site and building plans for the Intermediate Care Facility.
- The Commission, on December 1, 1988, approved the final site and building plans for an Intermediate Care Facility at the U.S. Soldiers' and Airmen's Home, as shown on NCPC Map File No. 12.10(38.00)-30133.
- The Commission, on June 25, 1992, approved the preliminary and final site and building plans for the Irving Street Entrance Gatehouse and Fence at the U.S. Soldiers' and Airmen's Home, as shown on NCPC Map File No. 12.10(38.00)-30680.
- Pursuant to delegations of authority adopted by the Commission on October 3, 1996, the Executive Director in July 2003 approved the preliminary and final site and building plans for Renovations and Temporary Trailers for the Tri-Community Charter School, as shown on NCPC Map File No. 12.10(38.00)-41200.

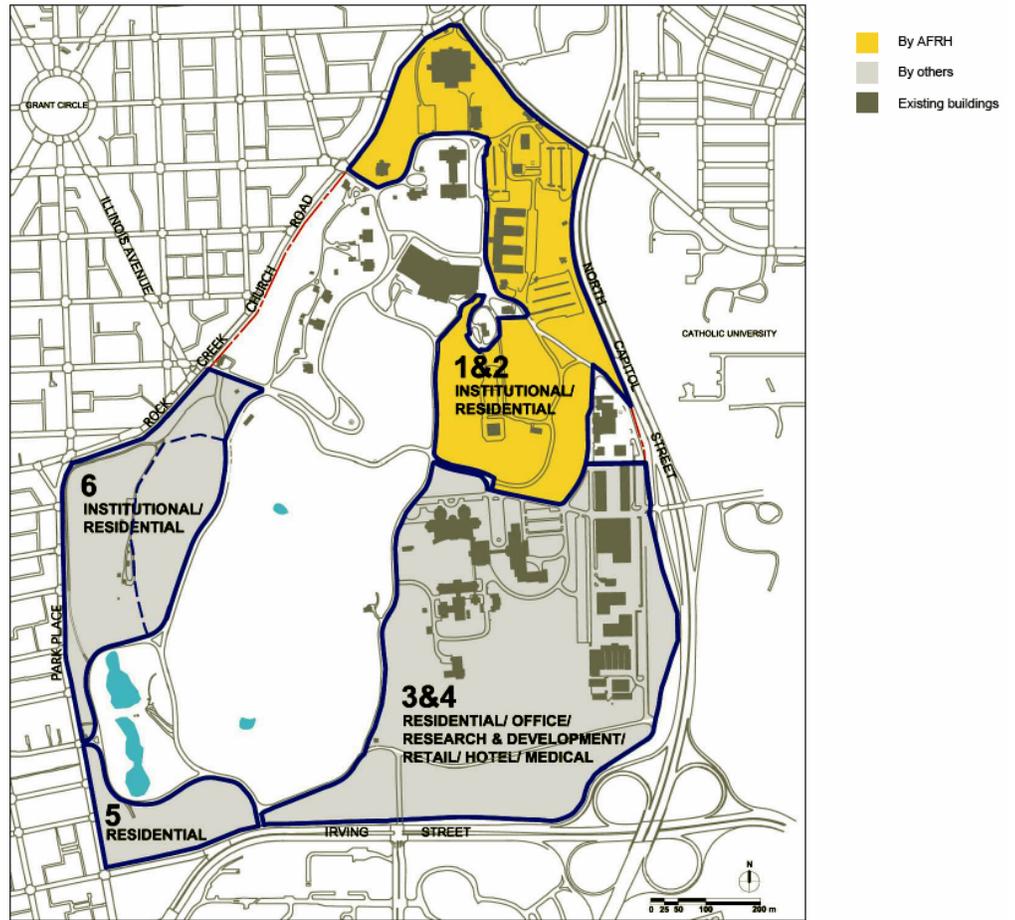
All projects subsequent to 1970 were in compliance with the concepts and goals of the approved 1970 master plan, except for the temporary trailers established in July 2003.

Applicant’s Proposal

Planning features

The plan identifies six development zones, with development to be implemented over a minimum period of twenty years. The development zones are conceived as separate parcels that could be offered incrementally to developers. Based on market demand, two or more zones may be aggregated to form a consolidated development area.

Development in Zones 3, 4, 5 and 6 will be undertaken by other than the AFRH through a competitive-offer process to lease the land and facilities. The remainder of the site will not be developed further in any significant way, and it will essentially remain as it is today. The secure perimeter for the retirement community would be relocated to exclude the leased land. Two golf course holes from Zone 4, and small, new facilities for recreational uses, such as the golf club house (Building 67) would be relocated within the secured perimeter.



PROPOSED DEVELOPMENT ZONES

The design guidelines that are part of the draft plan address the direction for the development of each zone. Zones 1, 2, 5 and 6 are treated separately, but there is one set of specific guidelines for Zones 3 and 4, which because of scheduling demands and the need for funds, will be finalized for full and complete design in the next nine to twelve months.

Zone 1 and 2

Development in Zones 1 and 2 will be primarily for AFRH’s use. These parcels, and an area not to be developed, involve the central area encompassing the golf course, Lincoln Cottage, the Scott Building, and smaller buildings and open space. The location for any new AFRH managed construction will be in Zones 1 and 2. Development in Zone 1 is proposed to be in keeping with

the historic campus/institutional character of the zone. Zone 2 is the planned location of low-density residential use for AFRH that would maintain the existing wooded character of the area.

Construction in Zone 1 (10 acres) is intended for the use of the AFRH only. New development would reinforce the existing historic resources and the campus-like arrangement of this zone. The maximum allowable gross area for new development in Zone 1 is 390,000 square feet and will be primarily institutional. Other use areas in the zone would include recreational activities for the AFRH residents. AFRH has not determined what facilities will be constructed; that will evolve over time with careful evaluation of the needs of the AFRH in the coming years. AFRH will be determining whether a replacement facility for the LaGarde Building, located in Zone 3, is justified economically and from an operational standpoint. That new facility may be constructed in the planned Zone 1.

Existing uses in Zone 1 that are not directly operated by AFRH include the operation of the Lincoln Cottage and a visitor center, intended to be open to the public. That facility is managed by the National Historic Trust. Also, the Smithsonian Institution operates greenhouses for its use in Zone 3, and AFRH will work with the Smithsonian to determine the potential relocation of that facility to Zone 1. There are two historic buildings located in Zone 1 that are not needed for AFRH operations – the Grant Building and the Security Building – and AFRH will encourage their adaptive re-use by other entities, as long as the use is compatible with its resident care community.

Zone 2 (18 acres) is created for low density residential use for AFRH within the existing, heavily wooded, natural setting. The maximum allowable area for new development in Zone 2 is 75,000 gross square feet. A variety of detached and 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 single and multi-family housing.

Zone 3 and 4

Development Zone 3 (55 acres) and Development Zone 4 (22 acres) would support the most intensive development on the AFRH property. New development is anticipated to have an urban character with a building typology able to accommodate large buildings that are 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 Zones 3 and 4 would be 5,680,000 and 1,165,000 square feet respectively.

Because of the feasible and good access points to adjacent major vehicular roads, advantageous topographical changes, and its proximity to Catholic University and medical center areas, the applicant has determined that portions of Zones 3 and 4 provide an ideal location for major mixed-use development. Uses in these zones could potentially include research and development, office, residential, hotel, ancillary retail, and educational uses.

Zone 5

At the western periphery of AFRH campus and across the street from Park View neighborhood, Zone 5 (8 acres) the submission proposes a series of small- to medium-scale residential buildings. The maximum allowable gross area for new development in Zone 5 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/or Irving Street. Institutional uses might also be appropriate for this area should expanded interest of the market suggest such a potential for that activity.

Zone 6

The submission proposes that development in Zone 6 would continue the residential character of the nearby Park View neighborhood with any new development being similar in scale and character. Two options for the zone would be one of 16 acres, and the other 25 acres. The area as a whole would be limited to a maximum allowable gross area for new development of 1,000,000 square feet if all 25 acres is developed and less should the acreage be lower.

In general, Zone 6 would be targeted for residential use with small scale, ancillary retail. The creation of a foreign mission campus is also a possibility, but no firm commitment or strong interest has been exhibited by the State Department to date. The introduction of open space for new residents and the Park View neighborhood would be the favored direction for development should it evolve toward further planning in the future.

Design Development Framework Guidelines

For each development zone, the submission includes development guidelines that define the primary use patterns, historic features, views, development sub zones, open space, streets and streetscapes, access and parking, and built form (building heights, density, set back requirements) that would be sought in each zone identified above. Each zone is defined and the specific requirements are presented in chart form in appendix A of this report.

The development guidelines establish basic but exact requirements for each zone and will be distributed in the formal solicitation of a design and development proposal, soon to be issued by the AFRH for Zones 3 and 4.

Plan Federal Employee Level

The submission assumes an employee population base at the AFRH of approximately 450 employees and approximately 1,400 member residents as of September 2005.

Transportation Management

The submitted draft plan does not include a Transportation Management Plan (TMP) at this stage.

AFRH intends to require the developer(s) of the leased areas of the AFRH to prepare TMP information on the exact development proposed. Until developers are selected and AFRH can further define development use, there is not sufficient available information to develop specific, effective transportation management strategies such as carpool/vanpool incentives, shuttles to and from transit facilities, and transit incentives. The submission specifies that AFRH will provide a completed TMP at the time of the final master plan. The selection process for developers for Zones 3 and 4 is underway, and AFRH will include the TMP for those zones with the final master plan in October 2006.

Transportation planning efforts, however, have been reviewed by the AFRH environmental document study and are presented as background to the potential issues of the master plan's effects on the existing AFRH property and environs. Total traffic volumes for the zones involved in the proposed development areas were determined by adding the site potential traffic volumes, based on an estimated mix of potential uses, to the current existing traffic volumes. Intersection capacity analyses were performed within the draft environmental impact statement study of intersections.

With the site traffic, most intersections are expected to operate at LOS E or better during both the AM and PM peak hours. The intersections of North Capitol Street/Harewood Road and Irving Street/1st Street NW are expected to operate at LOS F during both AM and PM peak hours. The intersection of North Capitol Street/Michigan Avenue is also expected to operate at LOS F during the AM peak hour. The District of Columbia Department of Transportation considers intersections to be adequate if they operate at LOS E or better. Therefore, master plan implementation as specified by the environmental analysis would have a direct, long-term, major, adverse impact on the North Capitol Street/Harewood Road intersection, the Irving Street/1st Street NW/site access intersection, and the North Capitol Street/Michigan Avenue intersection. For these reasons, AFRH anticipates need for a TMP with the final master plan implementation and in the response from development proposals.

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 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.

Development Program

Applicant: Armed Forces Retirement Home-Washington

Estimated Cost: The submission has no estimated costs identified. Individual projects that comprise the planning interval would be established under the specific developer proposals as determined in lease implementation documents. AFRH is currently seeking responses to a Request For Qualifications (RFQ) expressing interest in new construction, infrastructure development and the adaptive re-use of some buildings located in Zones 3 and 4. To do this, AFRH has initiated a two-phase selection process that includes:

- Stage I: AFRH is soliciting qualifications and general concepts. AFRH will review the responses and short list those respondents whose concepts best meet AFRH's objectives and who have exceptional experience in developing projects similar to the development program proposed.
- Stage II: Short-listed respondents will receive a Request for Proposals (RFP) with development guidelines, a ground lease, and other directions for submitting detailed information on the proposed development program, design, financial analyses and a financial offer to AFRH. If those negotiations are not successful, AFRH may negotiate with other qualified respondents to the RFP to conclude a transaction(s).

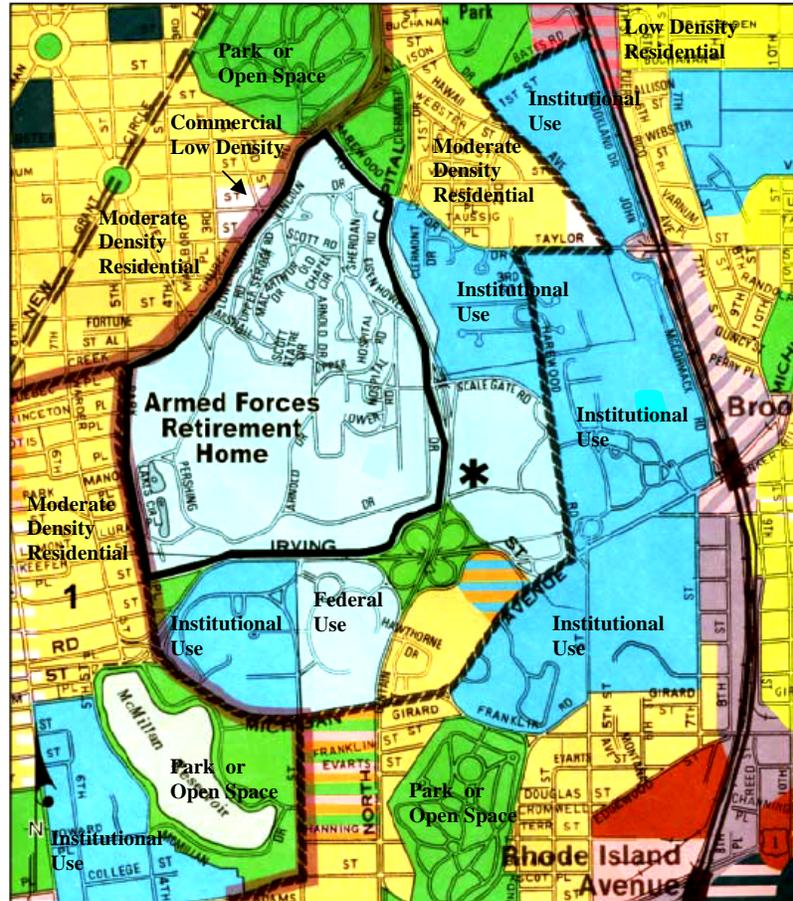
The AFRH recognizes that in order to enhance the value of the development to AFRH, it is important to draw upon the private sector's ideas, experience and expertise.

Architect: The draft plan was developed as a joint venture by RSM McGladrey, Inc., Koetter Kim and Associates, Inc. and EHT Tracerics, Inc. for the Armed Forces Retirement Home in Washington, DC.

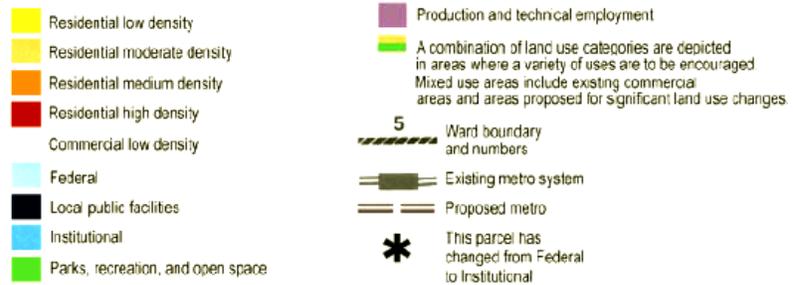
Urban Design Context

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 include: grocery, liquor, hardware, and clothing stores, beauty salons, restaurants, and other retail businesses. The site is located in Advisory Neighborhood Commission 5C.

According to the District of Columbia Generalized Land Use Map, land use on the AFRH 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, which is defined as row houses and garden apartments and some low density housing. The map shows the area south of the site as categorized institutional and federal. The area designated as federal east of North Capitol Street has recently been changed to institutional. This change is not reflected in the Land Use Map.



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



DISTRICT OF COLUMBIA LAND USE MAP

The map shows the area south of the site as categorized institutional and federal. The area designated as federal east of North Capitol Street has recently been changed to institutional. This change is not reflected in the Land Use Map.

Institutional land is defined as 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 site is institutional land that 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, both categorized Parks, Recreation 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 2005 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 new 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 has developed.

Other meetings involving the AFRH have been undertaken. A public scoping session, regarding issues of the NEPA document preparation for the master plan, was held in September 2004. 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	Sweet Mango Café
12-03-2005	Public Tour of AFRH	AFRH-W
12-07-2005	Section 106 Committee	AFRH-W
12-07-2005	Planning Committee	AFRH-W
12-13-2005	Open House	AFRH-W

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.

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 applicant's submission. To date, 21 pieces of separate and varied public correspondence have been introduced into the Commission's file on the plan, and these comments are attached to this report (see attachments). An additional eight form-letters, all opposing the draft plan, had been received as of Friday, January 27.

Coordinating Committee Meeting

The Coordinating Committee reviewed this item at its meeting on January 11, 2006, and forwarded the proposal to the Commission with the statement that the submission was coordinated with the General Services Administration, the District Department of Housing and Community Development, and NCPC. The District of Columbia Office of Planning indicated it would withhold its coordination of the proposal until further consultation with the District of Columbia Historic Preservation Office occurred.

Commission of Fine Arts

The AFRH has 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 has not yet received the draft master plan for review.

PROJECT ANALYSIS

Executive Summary

The current submission presents an AFRH planning effort long over due. The last prepared master plan occurred in 1970. However, the plan's new directions for land use and activities at the AFRH campus, resulting from revised management conditions of the AFRH in response to recent Congressional action, are affecting and potentially adverse to the Commission's vision and objectives as defined in the Comprehensive Plan for the Nation's Capital.

Staff, in general, believes that the planning objectives and the concept provisions of the draft plan regarding Zones 1 through 4 will maintain a compatible visual theme of the overall facility composition if carefully implemented. 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 to accommodate further development at this historic campus.

Specifically, the development guidelines for Zone 3 and 4 specify elements of development that adversely impact objectives of the Comprehensive Plan, and consequently require revision. The total gross square feet proposed by all development zones in the draft plan exceeds 9 million gross square feet and is beyond the alternatives discussed by the master plan environmental document (Draft EIS of May 2005). In its comments on the Draft EIS, NCPC found that "either Alternatives 3A and 3B appear best to achieve [development objectives] while maintaining significant and important qualities of the existing facility campus." The total gross square feet in those alternatives was 6.05 and 6.08 million, respectively. Staff also finds that building heights in excess of 65' in Zones 3 and 4 would be incompatible with the character and scale of the surrounding area and comparable local zoning districts.

Staff finds that development under guidelines for Zones 5 and 6 may be inadequate to protecting significant historic resources, and recommends that these guidelines be revised and resubmitted in accordance with consultation under the National Historic Preservation Act. Staff recommends that a significant publicly accessible park in this area, which is immediately adjacent to residential neighborhoods, is the most appropriate response to policies in the Comprehensive Plan that call for

conservation of a portion of the site for public recreational use. Any development in these areas should conform to adjacent zoning and development patterns.

Staff also has concerns regarding the total commitment of the AFRH to advance transportation management objectives of the master plan, and consequently strongly recommends that the Commission endorse a better defined TMP effort for dealing with the complete final master plan measures for achieving NCPC Comprehensive Plan goals.

Finally, the impact by this AFRH planning effort on the District's Strategic Neighborhood Action Plan for Brightwood Park, Crestwood, and Petworth, particularly with regard to transportation and the effects of traffic and land-use (open space recreation) on nearby residential areas, are specific community concerns. The Ward 5 plan is also part of the consideration for 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—all of which weigh on the appropriateness of the AFRH proposal.

In summary, staff is recommending **specific comments on the AFRH draft master plan submission with the noted provisions discussed in the paragraphs below**. Staff believes that implementing the recommended revisions will result in addressing the installation land use objectives and provide for the required new construction of buildings, while maintaining consistency and achieving objectives of the Commission's Comprehensive Plan.

Detailed Evaluation

Staff believes the increased density and the nature of framework guidance is clear but minimal in acceptability to achieve the desired change in character and still maintain basic attributes of important campus open space, landscape and streetscape character, and reasonable building massing in Zones 1 through 4. Primary concerns in Zone 1 and 2 involve the size of buildings adjacent to historic structures and the impact of development on the historic tree canopy, and are relatively minor in comparison with concerns regarding building heights and buffer space in Zones 3 and 4.

The appropriateness of the plan's provision for 130 feet of building height in Zones 3 and 4 is very problematic in context with the Commission's Comprehensive Plan clear guidance to... "Preserve the horizontal character of the national capital through enforcement of the 1910 Height of Buildings Act", given the street widths anticipated in the master planning effort. The Height Act sets the maximum height of buildings relative to the width of the fronting street. Consequently, the measure of the street width can directly affect a building's height within federal jurisdiction. Additionally, the suggested building heights proposed for the guidelines would impact objectives focused upon in the Comprehensive Plan's emphasis of city terrain features finding... "(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. Finally, staff of the District of Columbia Historic Preservation Review Board² has noted that such heights would be incompatible "because of the effects that such buildings would have on views in and out and because the city's 130-foot heights

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 26, 2006.

only occur downtown and in the New York Avenue corridor... The trade-off of greater height for more green space around such buildings might be meaningful for designing *within* Zones 3 and 4, but it would be deleterious to the surrounding context.” Consequently, with the issues of the Comprehensive Plan, the divergence of the submission’s proposed heights from the 1910 statute, and the Historic Preservation Review Board’s concern, staff recommends the Commission require a maximum permissible height, within Zone 3 and 4, of 65 feet only. This limit considers not only the aspects noted above but is consistent with zoning in areas such as Friendship Heights and Van Ness.

Another issue of Zone 3 and 4 is the amount of provided buffer at the boundary of the development. The minimum setback specified from the property boundary is eighteen feet. Previous Commission review of the character development for the boundary of the AFRH in 1970 called for a comprehensive buffer on all property boundaries at 120 feet. Staff believes an appropriate buffer of at least 50 to 100 feet should be required at Zone 3 and 4, given the extent of density contemplated, and the transitional nature that the campus boundary should serve.

Zones 5 and 6 present important concerns and appear less defined by framework guidance that would account for all significant features of the area regarding development. Furthermore, Zones 5 and 6 extensively affect the issue of maintaining important visual viewsheds, historic open space, and campus design character as specified by the District of Columbia Historic Preservation Office and NCPC staff review. Consequently, staff finds the Zones 5 and 6 framework guidance should be excluded from further consideration at this time, revised, and resubmitted.

Much community focus on the proposed draft plan emphasizes the availability and access to recreational open space. The Comprehensive Plan refers specifically to AFRH in its 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.” Staff notes that guidelines for Zones 3 and 4, which include a portion of historic pasture area, call for open space to be created and/or maintained. (See diagram on page 17) However, the proximity of Zones 5 and 6 to residential neighborhoods and the historic and environmental sensitivity of those areas leads staff to find that public park areas should be provided in those zones as well.

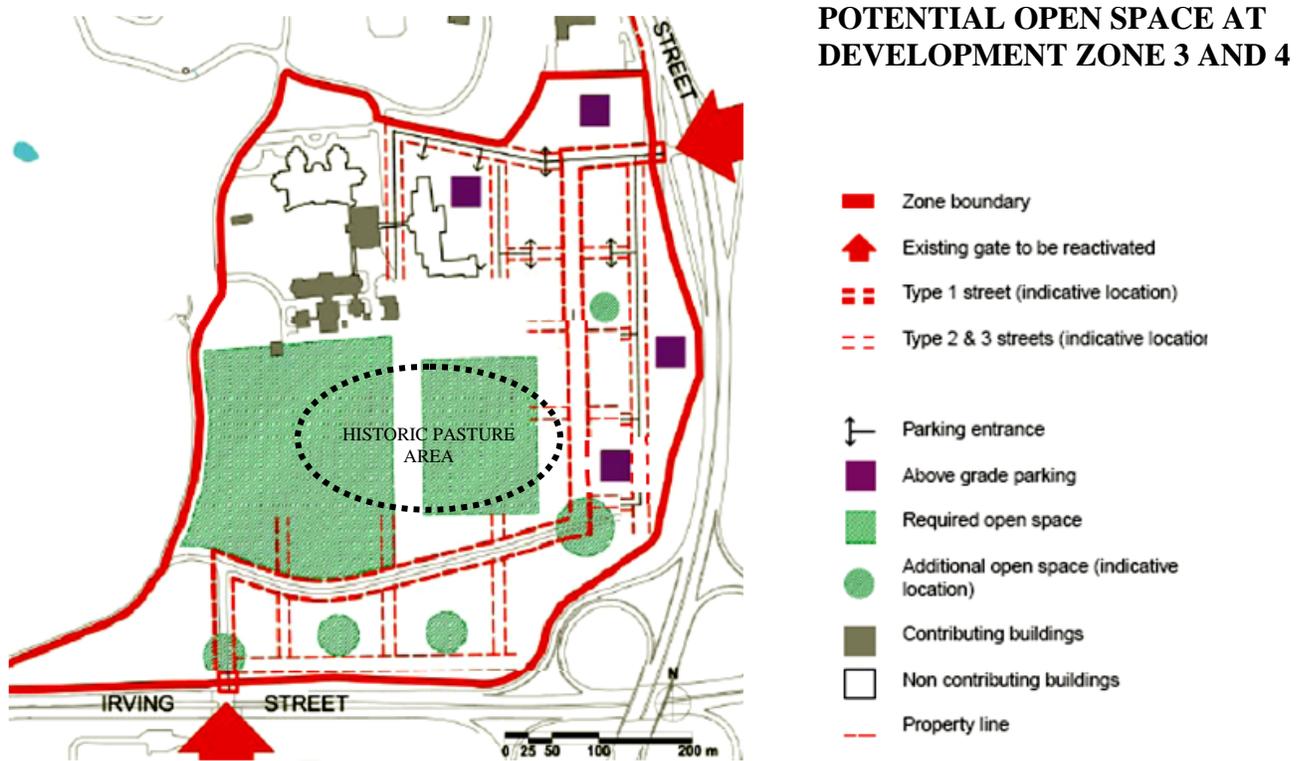
Currently the entire AFRH site is secured and not open to the public. However, the relocation of the secured perimeter proposed in the submission provides an opportunity to achieve the open space goals established in the Comprehensive Plan. Thus, staff believes a more concerted effort must be achieved within Zones 3, 4, 5 and 6 to specify and highlight a recreational open space component to the plan, and clarify exactly a requirement that organized recreational space, coordinated with community input.

This consideration of working with community objectives is not without precedent in recent redevelopment efforts by various federal agencies. The Navy Yard has worked intensively with the surrounding business and residential community to improve amenities and opportunities in the area for current residents and Navy Yard employees. The Marine Corps furthermore has established cooperative arrangements in its creation of new improvements at the Marine Corps Barracks in Washington, and the adjacent community, to meet and participate in quality of life issues of its adjacent neighborhoods in the District.

Regarding other aspects; while encouraged by certain characteristics of the plan, staff requests the Commission remind the AFRH that implementation of a Transportation Management Plan (TMP)

is important and must be achieved to address the full campus, not just the short-term development. Additionally, TMP development and implementation requires dedicated staffing of a responsible transportation coordinator at the facility to achieve successful results. Thus, the AFRH should establish that a Transportation Coordinator position is to be created at the AFRH that will serve to manage, maintain, and coordinate a TMP for use by the AFRH. The TMP must be established in coordination with the District of Columbia Department of Transportation and the Washington Metropolitan Area Transit Authority.

Two final issues pertaining to the master plan implementation involve permit compliance in



approval of building construction and the continued existence of approved *temporary construction* for the function of the charter schools at the AFRH.

To date, the AFRH has sought guidance of the General Services Administration (GSA) in assisting in development of the master plan. However, GSA clearly has indicated it does not desire to review and approve building and site construction designs for purposes of permitting final construction of proposed improvements. Conversely, the District of Columbia has indicated it has no direct permitting authority over federal land or facilities, and could not assent to permitting actions being administered by District agencies without District Zoning Codes being in place for the AFRH property. Consequently, the Commission staff seeks resolution of this issue by recommending the Commission specify that the AFRH seek GSA assistance, as an agent of the AFRH proposal, to implement an agreement with the District of Columbia agencies detailing what actions and responsibilities' will be achieved to permit building construction for the proposed development.

The charter school issue is being identified by staff as a specific element to be resolved by the AFRH in completing its final master plan for approval by NCPC, and which resulted from comment on the plan. Staff recommends the Commission require the AFRH to present a strategic concept and schedule within the master plan identifying a permanent space and location for the charter schools that currently reside in temporary trailers on the AFRH campus. Staff's main focus is to assure the master plan accomplishes removal of the temporary facilities within the most immediate timeframe possible as anticipated by the original Commission approval in 2003. NCPC approval, by delegated action in July, 2003, was based on submission information indicating that that the trailers would be removed by the summer of 2005.

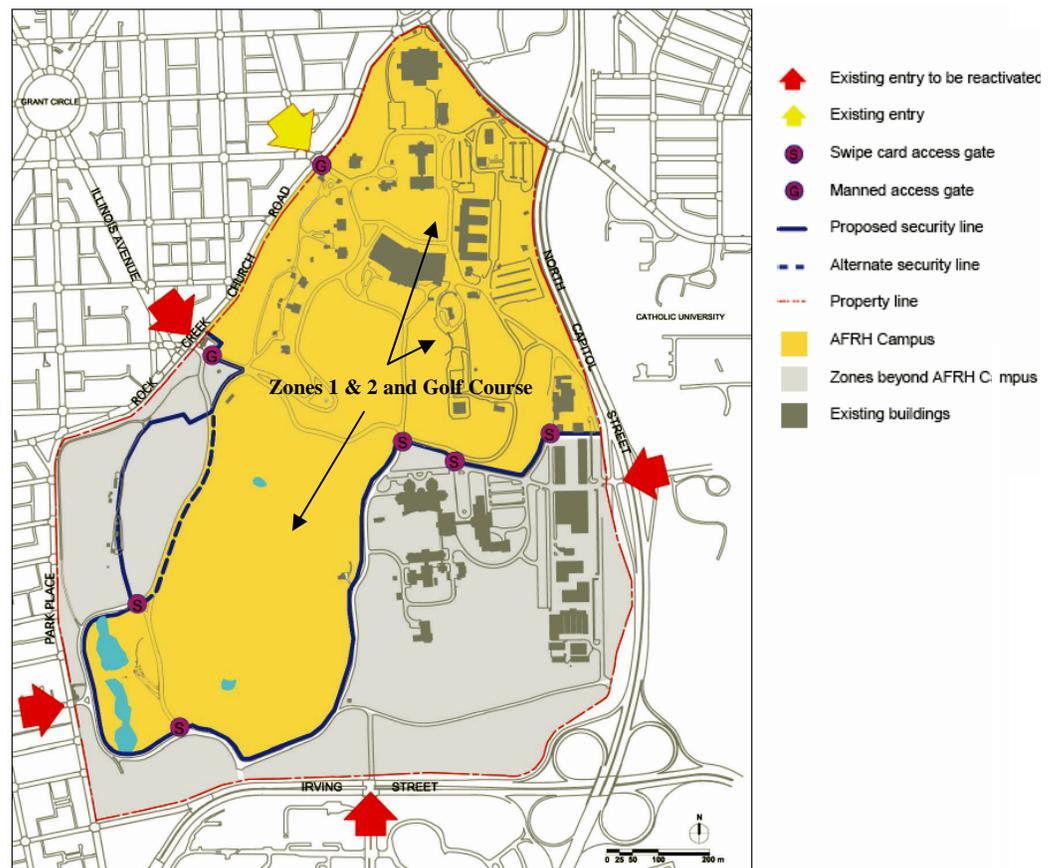
CONFORMANCE

1970 Master Plan

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

Urban Design and Security Plan

The submitted plan has undertaken a certain level of security review in the content of protection of real property and safety of the resident veterans, many who are elderly. Moreover, setbacks of proposed building locations have been identified in the submission, and control points and/or inspections points for both pedestrian and vehicle traffic have been established in relation to entering and leaving Zones 1 and 2 of the AFRH.



DRAFT MASTER PLAN PROPOSED SECURED PERIMETER FOR THE AFRH COMMUNITY

The Commission's current Urban Design and Security Plan (UDSP) does not directly specify measures to be implemented at federal research or residential living campuses. The UDSP implementing submission guidelines, recently approved by the Commission, emphasize that the UDSP measures seek to protect the physical design principles inherent in the District of Columbia historic plan and its historic resources, and to minimize the physical and visual intrusion of security barriers into public space (such as the national capital's vistas, rights-of-way, parks, squares, circles and plazas). These issues are generally applicable to the AFRH planning effort given its physical location within the District of Columbia.

The recent addendum strategies of the UDSP also emphasize that they strive to balance the use of building perimeter security with the functional and visual quality of public space, paying attention to: historic resources and the democratically-inspired design principles inherent in historic city plan; the surrounding region's need for mobility, mixed use development and activated street level areas to protect and enhance economic vitality; and the importance of protecting public space from the adverse impacts of perimeter security to ensure that residents, workers and visitors maintain their rights to access, use, and enjoy the grace and beauty of public space in the capital and the region.

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 Zones 1 and 2 and its surrounding recreational areas. In context with the nearby community, the whole of the AFRH existing campus was originally closed to the public in 1925. The proposed draft plan would now reduced the perimeter fence area of the Home and provide public access to Zones 3, 4, 5, and 6 as demonstrated in the diagram on page 18.

Levels of restriction and screening of persons and vehicles entering Zones 1 and 2 is proposed to be a standard security measure implemented at the AFRH, and would vary in accordance with the alert level established by the Homeland Security Advisory System in coordination with the Department of Defense and the Department of Homeland Security.

National Environmental Policy Act

Pursuant to the requirements of NEPA, the AFRH prepared an Environmental Impact Statement (EIS) on the plan and its associated larger projects affiliated with Zones 3 and 4. The AFRH circulated the EIS for public comment in May 2005. The AFRH will be completing its review of comments and will conclude the EIS with a Record of Decision on the final master plan in late September 2006.

The NCPC is required to provide its own separate review of the final EIS and will develop an individual Record of Decision for approval of the final master plan in October or November 2006, if sufficient evidence appears within the final EIS. The final EIS must demonstrate the AFRH has considered the environmental impact of the proposed master plan, and has identified and adopted appropriate mitigation actions in its NEPA decision addressing issues specified by NCPC and the U.S. Environmental Protection Agency.

In July 2005 the NCPC staff commented on the draft EIS to highlight several issues the staff noted. These are:

- The master plan alternatives would increase energy demands and air pollutants emitted by on-site facilities required to provide operational energy. According to *The Master Plan, Steam System Evaluation* (February 2005), approximately 50 percent of the existing AFRH boiler system capacity is available to accommodate the increased demand; however, it would be insufficient to serve the needs of all of the development proposed under any master plan. Therefore modifications to the system, primarily increased boiler capacity, would be required. The resulting necessary boiler capacity revisions indicate that the annual potential to emit (PTE) NO_x emissions estimated for all the alternatives would exceed the annual de minimus NO_x threshold of 25 tons per year. In accordance with the federal General Conformity Rule, if the direct and indirect emissions of a criteria pollutant (or its precursors) are above the *de minimus* level, AFRH would have to prepare a formal general conformity determination for that pollutant. This requirement should be specified and further details provided within the final NEPA determination of the AFRH on master plan development.
- That intersections at North Capitol Street/Harewood Road and Irving Street/1st St NW/site access are expected to operate at LOS F during both the AM and PM peak hours. Staff emphasizes that the Commission would expect, as part of the final decision determination under NEPA, that the AFRH-W will elaborate and specify necessary binding guidelines for any development agreement which would require a developer to prepare a transportation management plan detailing strategies to reduce single occupancy vehicle use and that also would, if necessary, physically improve the above noted intersections or their signalization.
- That the substantial removal of vegetation in any proposed plan would not be supported by the Comprehensive Plan objectives of the new policies of the Commission. We strongly request that a final NEPA determination specify additional guidelines toward specific mitigation efforts under the guidance of a prepared tree and open space conservation plan regarding access roadway alignments, maintaining open space, and integration of public space with development areas. Green space preservation should be maintained within every development zone of the plan as a component of its development.
- That all eight character areas of the AFRH Historic District could be directly affected by the master plan implementation. The 272 acres of the AFRH, part of the Home since 1873, would potentially be affected by the construction of new buildings and would be reduced in size by the private development of some areas of the AFRH. Cultural landscape features such as roads, paths, tree lines, and streams could be disrupted or lost entirely. New construction could significantly alter the historic context of individual buildings and building groups, and could obscure the relationship between buildings. In the context of viewshed analysis, views to and from the site as well as views through the site should be fully evaluated. Staff re-emphasized that a fully evaluated and consulted programmatic agreement developed under Section 106 of the National Historic Preservation Act (NHPA) must be carried forward by the AFRH to address these important and adverse effects to the significant AFRH District.
- The National Historic Landmark and Historic District could be affected by new construction in Zones 1 and 2, and possibly by new construction in Zones 3, 4 and 5. Other adjacent historic resources, such as the National Register-listed properties that include the Adams Memorial, the Rock Creek Church Yard and Cemetery, and Saint Paul's Episcopal Church and other potentially eligible properties, might also be affected by the proposed development. The eligibility of properties described as potentially eligible in the draft

should be resolved through consultation with the DCSHPO before the final document is released.

- That NCPC staff asked to participate in the Section 106 consultation leading to the development of the programmatic agreement. NCPC concurred with the objective of completing development guidelines within the agreement consistent with the Secretary of Interior's Standards for avoidance and minimization of effects to historic resources. NCPC staff also emphasizes that provisions of Section 110 of the Act apply to the master plan undertaking.

National Historic Preservation Act

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 U.S. 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 Gothic Revival-style house is now known as the Lincoln Cottage and is being restored and prepared for public visitation by the National Trust for Historic Preservation.

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. More than one hundred resources have been determined to contribute to the character of the district—buildings and features of the setting. In addition to the buildings named above, the historic buildings on the site include significant nineteenth-century buildings for veterans, as well as administration and support buildings, and residences for employees.

Given the historic designations, the undertaking is subject to review under both Section 106 and Section 110 of the National Historic Preservation Act. Section 110 requires that federal agencies, "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark."

While there are some more 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 setting, 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 site. 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 is situated on the ridge above what came to be known as the McMillan Reservoir and provides a green ridgeline on the topographic bowl around the center of Washington. Since 1901, the campus's boundaries and surroundings have changed. 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.) The Home's location north of the U.S. Capitol and its dominant topographical height, provides important views of the Capitol that are integral to the historic and open space character of the Home.

AFRH has initiated consultation on the draft master plan with the DC State Historic Preservation Office and the Advisory Council on Historic Preservation, as well as with the staffs of NCPC and other agencies and parties. AFRH, with the General Services Administration and the consultant team, held meetings this past fall and winter 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 is very useful and should be the basis for future development proposals. As the design team has studied the development potential on the site, they have created models that have allowed participants to study the proposed development ranges in each proposed development zone. Staff notes that several residents and citizen organizations have written the Commission and testified before the DC Historic Preservation Review Board that they are dissatisfied to date with the public process of consultation.

Several additional documents are in development and must be considered in concert with the preparation of a master plan and be concluded before the master plan is submitted to the Commission for any subsequent or final reviews. These documents include design guidelines for future development; a Preservation Plan for the historic buildings, features, landscapes, and viewsheds at the site, especially in Zones 1 and 2; and the execution of an agreement to satisfy the requirements and goals of the National Historic Preservation Act. The parties anticipate that the result of the consultation will be a Programmatic Agreement (PA) that incorporates these other documents and the agreements reached during consultation.

The Preservation Plan is being written by the project team and is not yet available for review by any agency. The DC SHPO has made it clear during consultation that the development plans must be accompanied by a Preservation Plan for the historic buildings and settings on the site so that the provisions for both objectives--preservation and development—can be assessed together. Repair and the appropriate reuse of the historic buildings should be an integral part of the master plan's development.

Zone 1, at the north of the site, contains the Grant Building, a large and significant historic building at the Home. Staff is concerned that proposed new construction in this zone would encroach on the setting of the Grant Building and affect the views from the Lincoln Cottage.

Zone 2, at the northeast corner of the site, is a wooded area that helps to define the green topographic bowl. Therefore, construction in this zone would need to be carefully integrated with its prevailing natural character.

Zones 3 and 4, at the southeast portion of the Home, are generally agreed to be the most appropriate area for significant new development. It will be the area where AFRH will first pursue development opportunities. There are historic landscape features in this sector, as well as views to and from the site. Zone 3 contains many non-contributing buildings and is a reasonable area for redevelopment. The lower slope on the escarpment contributes to its sensitivity, but its proximity to North Capitol Street as well as the hospital complexes to the south of the Home lends itself to compatible new development. The building heights and density currently proposed by AFRH are incompatible with the character-defining landscape features, as discussed elsewhere in this report. The nature of the development patterns allowed in the master plan should protect and be commensurate with the nature of the contributing features and vistas. At the same time, development could be directed to these zones so that other sectors of the site can retain greater integrity of its buildings and settings.

Zones 5 and 6, located in the southwest sector of the site, are anticipated for later implementation. This sector contains slopes, trees, built features, and views of the city that are integral to the character of the site as a whole. The sector is also adjacent to the National Historic Landmark and the Lincoln Cottage and the approach to it. This sector of the site is also adjacent to neighborhoods to the west that have long enjoyed views into the Home. Staff recommends that the character of this sector be studied further through the Section 106 consultation process and be fully revised.

The D.C. Historic Preservation Review Board, in its role as advisor to the State Historic Preservation Officer, heard this case at its January 26, 2006 meeting. Citizens, ANC commissioners, and organization representatives testified in opposition to the current plan. The SHPO's staff report is attached to this staff report. The report was endorsed by the HPRB, and the Chairman reiterated the expressed concerns of citizens about the public process.

Comprehensive Plan for the National Capital: Federal Elements

The submitted AFRH draft master plan is, at this time, limited in its consistency with the *Comprehensive Plan for the National Capital: Federal Elements*, with the important variances earlier noted. 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 planning currently underway.

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 (*underlined emphasis added*). 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 may achieve some of these goals if appropriately planned.

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)

Other policies involve the transportation demand management objectives cited in the *Comprehensive Plan for the National Capital: Federal Elements* that include the following policies:

The federal government should:

1. Encourage ridesharing, biking, walking, and other non-single-occupant vehicle modes of transportation for federal commuters.

2. Maximize telecommuting strategies for employees in accordance with federal law.

3. Employ compressed and variable work schedules for employees, consistent with agency missions.

5. Steadily increase transit subsidy rates, and consider applying subsidies and incentives to other modes, such as biking, walking, carpooling, and vanpooling.

(Federal Transportation Element, Transportation Demand Management, p. 88)

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 2006-2011 FCIP was adopted September 15, 2005 and included some projects that, although anticipated by the submission, are not specifically noted, but were submitted to NCPC for FCIP program review. The review and indicated recommendation of the adopted FCIP analysis includes:

- Construct Memory Support Unit

Recommended

\$7,400,000 (estimated total project cost). The existing 26,000 square feet space at the Scott Building will be renovated for a new Memory Support Unit (Dementia) with an adult day activity area.

- Construct Assisted Living Units

Recommended

\$8,400,000 (estimated total project cost). This project will convert the existing 34,400 square feet of floor space on two floors of the Scott Building from independent to assisted living units.

- 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.

APPENDIX A
AFRH Proposed Development Guidelines

Zone 1 Development Guidelines

<p>Historic Features:</p>	<p>Buildings in this zone which contribute to the historic character of the site include the Grant Building, the Administration Building, Stanley Hall, the Security Building, the Cemetery Gate House, and Building 40. All but the Grant and Security Buildings are in use, and AFRH is encouraging the adaptive re-use of those two buildings. Existing lawns, planting, and other historic landscape elements, including the North Gate Lodge, would be protected.</p>
<p>Views:</p>	<p>The development of this zone should retain existing views from and into the AFRH site to the extent possible. Specifically, the existing level of visibility from outside the property through the boundary fence should be maintained. Views from the back of the Scott Building to the Scott Statue, located directly south of Zone 2, would be maintained.</p>
<p>Development sub-zones:</p>	<p>Three areas of development prevail in this area; Zone 1a to the north, Zone 1b to the east, and Zone 1c to the west. There will be minimal development in Zone 1a, and small structures, if located there, would flank the green space in front of the Grant Building. In particular, the former Sheridan Building site offers opportunities for redevelopment.</p> <p>New development would be primarily located in Zone 1b, which is currently dedicated to expansive areas of surface parking. New development would be introduced in Zone 1b after careful consideration of the relationship of new buildings with the existing ones. Little or no construction may be introduced in Zone 1c around the Sheridan Building, unless a connection is needed to new facilities constructed in Zone 1b.</p>
<p>Open Space:</p>	<p>Open space in Zone 1 would be maintained and redefined. For example, small, new buildings flanking the green space in front of the Grant Building might create a quadrangle and give better spatial definition to the existing open space. If a new facility is constructed to the east of the Sheridan Building, an open space could be created between the Sheridan Building and the new building as an amenity. Removing the existing parking lot and constructing structured parking would be achieved to create this new open space. The existing green buffer zone on North Capitol Street and the northern boundaries of the site would be maintained and enhanced.</p>
<p>Streets and Streetscapes:</p>	<p>All new construction in the zone would employ the existing historic streets and street patterns, maintaining existing alignments.</p>

<p>Access and Parking:</p>	<p>Structured parking would be accommodated in Zone 1b to serve visitors, as well as new and existing buildings’ residents and employees. Parking for residents and other occupants of existing buildings would clearly separate from visitors’ parking for security access and control reasons.</p> <p>Currently a total of 594 spaces are available in Zone 1 for existing buildings. Parking allocations for new development should be able to accommodate this figure in addition to 780 new parking spaces to serve new buildings. Parking demand calculations are made on the basis of one space per 1,000 square feet for residential use, and 2 spaces per 1,000 square feet for institutional uses. There will be no routine bus parking in this zone for other than AFRH purposes.</p>
<p>Built Form:</p>	<p>The height and massing of new construction would be compatible with the adjacent existing buildings to accommodate full integration of any new construction. In Zone 1a, new construction may be up to 55 feet in height. In Zone 1b, the building height would not exceed 85 feet. New construction along North Capitol Street should maintain a setback from the site boundary and a liberal spacing between buildings.</p>

Zone 2 Development Guidelines

<p>Historic Features:</p>	<p>The intact wooded areas present within the zone in 1877 and 1910 would be protected. Existing historic landscape elements, including forestation and a continuous tree canopy, should be preserved. The existing alignment of historic roads and paths would also be preserved.</p>
<p>Views:</p>	<p>The development of this zone would enhance historic views from and into Zone 2 to the extent possible. In particular, the view of the Rose Chapel within the woods as seen from the Officer’s Quarters on MacArthur Drive and the Formal Meadow are important to preserve, as would be the view of the forestation from the Scott Statue.</p>
<p>Development sub-zones:</p>	<p>Three sub-zones are identified for Zone 2. They are: 1) the most heavily wooded area (Zone 2a), 2) the central open space (Zone 2b), currently used as surface parking, and 3) the lightly wooded area along the east edge of the zone (Zone 2c).</p>
<p>Open Space:</p>	<p>Open space in Zone 2 would retain and emphasize the overall wooded nature of this part of the site, and the portion of Zone 2a that is located to the west of Zone 2b should not be developed.</p>

	<p>Zone 2b could be transformed into a landscaped open space around which new housing units are organized. Zone 2c should be treated as the natural continuation of Zone 2a. Its development should reinstate the wooded character of this part of the site. New trees should be introduced with scattered housing in between.</p>
<p>Streets and Streetscapes:</p>	<p>All new construction would retain and utilize the existing historic access road patterns. New roads should be minimal and are required to be of Type 4, which is intended to be the most similar to the character and treatment of existing access roads.</p>
<p>Access and Parking:</p>	<p>All parking in the new construction will be self-parked with private garages to the rear or side. Garages should be integrated with the site topography. They will sit within the existing woods and could be attached, detached, or below the residential accommodations.</p> <p>A total number of 75 parking spaces should to be provided in this zone. Parking demand calculations for residential uses are made on the basis of one space per 1,000 square feet.</p>
<p>Built Form:</p>	<p>The height and massing of new construction would respect existing historic features. The preeminence of the Rose Chapel at the foreground of the woods should be retained.</p> <p>All structures to be built in this zone should be sensitive to the surrounding historical fabric and should be of a mass and height that will not overwhelm Rose Chapel and the two historic houses nearby (Buildings 41 and 45). Specifically, new construction should be minimally visible from outside the Chapel Woods and beyond the Rose Chapel when viewed from the north and should not exceed 40 feet in height. Pitched roofs, if utilized, would not exceed this maximum height limit.</p> <p>New construction should respond to the site’s topography and should not harm or destroy existing trees.</p>

Zone 3 and 4 Development Guidelines

<p>Historic Features:</p>	<p>Buildings in this zone would relate to and respect landscape features and open spaces that are now underused or neglected should be reinvigorated. This applies to the historic Pasture, a significant portion of which should be preserved in the form of a large public open space. The existing tree line along Pershing Drive should also be preserved.</p> <p>Contributing buildings should be adaptively reused. They</p>
----------------------------------	--

	<p>include the Barnes Building, the Hostess Station, the Forwood Building, the Mess Hall and its corridors, and King Hall. Adaptive re-use of the house, bandstand and carport is encouraged. Other non-contributing buildings may be demolished.</p>
<p>Views:</p>	<p>Views to be protected as Zones 3 and 4 include the view from Scott Statue south through the entrance at Irving Street and external views into these zones from North Capital Street.</p> <p>Views from historic buildings within the zone east to the Basilica, although not historic, are desirable to maintain.</p>
<p>Development sub-zones:</p>	<p>Zone 3 is subdivided into three sub-zones, each having its own character and design requirements. Zone 3a, an area that contains open land area that was present as early as 1877, should be preserved as an open space. Zone 3b, currently an open space, could accommodate several new structures within a park setting. Zone 3c, now the location of a number of non-contributing buildings, has the highest developmental potential. Zone 4 also has high developmental potential given its strategic location on Irving Street.</p>
<p>Open Space:</p>	<p>New development in Zones 3 and 4 is envisioned to take place around a series of interlocking or interconnected public open spaces of varying scales. The detailed design and programming of these open spaces will be essential as they are brought to realization individually over time. However, any design should respect existing landscape features and should adhere to the guidelines below.</p> <p>A significant portion of the historic Pasture should be preserved as a public open space. Specifically, the portion of the historic Pasture falling within Zone 3b is intended to become the prime open space and a focal point for new development. At least four acres of open land within this sub-zone are required to be preserved as a public open space clear of any construction. This open space is intended for passive recreation, which can accommodate various activities depending upon the specific ground floor uses of its surrounding buildings.</p> <p>Zone 3a should be preserved as an open space with the maximum allowable coverage of 10%. The view from First Street into the site could be maintained through the creation of an open space at the Irving Gate entrance. This open space could be framed by placing buildings on both its east and west sides without blocking internal views. The presence of this open space is also important to maintaining a good view corridor from the Formal Meadow to the Capitol and the Washington Monument.</p> <p>Additional public parks and open space should be provided in locations defined by building frontages and the street network. Additionally, smaller open spaces that punctuate</p>

	<p>the street pattern in order to create a diverse set of internal environments and convenient amenity space for surrounding buildings are recommended.</p> <p>The potential for pedestrian connections and a bike path should be explored as the exact location and configuration of each space is determined. To enhance the existing green edge of AFRH, a green buffer zone should be created within the interior boundaries of AFRH on both Irving Street and North Capitol Street. The buffer zone would include a bike path accessible to the public. The buffer zone need not be of a uniform width. It might become wider or narrower as deemed necessary to address existing landscape features and better relate to the surrounding city fabric.</p>
<p>Streets and Streetscapes:</p>	<p>In zone 3 and 4, a single primary street is recommended as the main vehicular connector between the Irving Street entrance and North Capitol Street entrance. The alignment of this street should respect the curvilinear historic path of Pershing Drive, but its width should adhere to the general streetscape guidelines governing Type 1 streets. Because of the dimensions of a Type 1 street, Pershing Drive cannot be fully retained and needs to be widened either on one or both sides. The existing tree line along Pershing Drive could become a landscaped median line for the new street or could be incorporated with the planting strips along one of the sidewalks of the new street.</p> <p>A system of secondary and tertiary streets would be required to provide vehicular and service access to new development and existing retained buildings. The proposed street network should continue the existing street system wherever possible and should conform to the requirements of streetscape Types 2 and Type 3, as relevant.</p> <p>All new streets within this portion of the site are intended to have an urban character with street trees and wide sidewalks that help create a safe and habitable pedestrian environment.</p>
<p>Access and Parking:</p>	<p>Zone 3 and 4 building entries would be from the primary north-south connecting road or from one of the several open spaces envisioned for this portion of the site.</p> <p>Vehicular access will be fully open to the public. Service vehicle access would be maintained through the Irving Street and North Capitol Street entrances. Parking and service entrances would be from the new tertiary network rather than from the main north-south collector road. New buildings would have parking below grade. Underground parking may extend below the internal street network. Additional parking would be provided in above-grade parking structures. However, the location of above-grade parking garages is restricted to locations indicated in the zone plan in order to minimize their potential visual impact. Parking demand calculations are would be made on the basis of one space per 1,000 square feet for residential use, and 2 spaces per 1,000 square feet for labs, office, and</p>

	<p>mixed uses.</p>
<p>Built Form:</p>	<p>New development in Zones 3c and 4 would accommodate the larger commercial building types, but would be designed in such a way that they integrate public spaces to create a sense of place.</p> <p>In general, building heights would relate to the width of the surrounding streets. Proposed building heights and orientation would be designed in a way that takes advantage of the site topography and existing view corridors. A datum height, i.e. a maximum height plane, of 85 feet has been set for all new development in Zones 3 and 4. However, some taller buildings, up to a 130-foot maximum, are proposed in locations fronting on large open spaces or major streets intersections and in locations that do not obstruct existing views. The location and area covered by tall buildings would adhere to the following guidelines:</p> <ul style="list-style-type: none"> • The footprint covered by taller buildings should not exceed 10% of the overall area covered by new buildings; • The footprint size of any tall building in Zones 3a and 3b should not be more than 15,000 square feet; • The footprint size of tall buildings in Zones 3c and 4 may go up to a maximum of 25,000 square feet. <p>Some of the possible locations for buildings in excess of 85 feet are those generally indicated in the Plan.</p> <p>Building façades fronting on major open space or the main new north-south primary road would be built to align their building walls directly adjacent to the sidewalk and edges of the rights-of-way. Buildings fronting on Irving Street or North Capitol Street are required to be setback by a minimum of 18 feet from the site boundaries. Articulations of and creative variations in the street façade are encouraged in order to create an inviting appearance. Larger buildings types would not have massive floor plates. Large building types would not be monolithic in their façade treatment but should have vertical changes in their massing and/or façade treatment, and their upper floors would be set back with respect to their main body envelope so as to be compatible with the scale of adjacent existing buildings. The development of retail and public uses on the ground floors is encouraged in order to create an active pedestrian environment, and the development of blank walls (including garage walls) fronting on primary and secondary streets is discouraged.</p> <p>The integration of the built form and the pastoral settings would be addressed using the picturesque existing landscape features to guide development decisions.</p>

Zone 5 Development Guidelines

<p>Historic Features:</p>	<p>The forested areas that fall within Zone 5’s boundaries would be protected. The natural stream and artificial ponds would be preserved, along with as much of the tree cover as possible. The historic fence would be restored and maintained.</p>
<p>Views:</p>	<p>The development of this zone would retain existing views from and into the AFRH site to the extent possible. Specifically, new construction should benefit from its proximity to the Lakes and from north views towards the Lakes and northeast views towards the Central Grounds. Existing views from Irving Street and from the Park View neighborhood into the AFRH site would be maintained, and the view from the McMillan Reservoir towards the southwest corner of the site would be continued and protected.</p>
<p>Development sub-zones:</p>	<p>None</p>
<p>Open Space:</p>	<p>Open space in Zone 5 would be maintained and refined to establish a sympathetic to the character of the Lakes and their surrounding historical landscape features. Development would preserve a green buffer around the southern and western boundaries of Zone 5. In addition, the development of Zone 5 would reinvigorate those areas that are either now under used or neglected by providing a better structure for their use. In particular, the existing stream should become an organizing open space a major special feature integrated with new development of an appropriate scale.</p>
<p>Streets and Streetscapes:</p>	<p>All new circulation roadways would be a Type 3 street in this zone in order to serve new development. The alignment of the historic loop around the Lakes will remain as it is but would be widened from its Zone 5 side. The new width and treatment of the altered historic loop road would adhere to Type 2 streets and streetscape.</p>
<p>Access and Parking:</p>	<p>Buildings fronting on Irving Street and Park Place would have their main entrances on these streets. Pedestrian connectivity between the southwest corner of the site and the surrounding neighborhood to the south would be established. The existing west entrance would be opened to serve this zone. New Type 3 streets will be introduced in this zone that will, together with the existing Pershing Drive, provide vehicular access to new buildings.</p> <p>Parking entrances will be from new streets and not from the historic loop. Both on-street and structured below-grade parking would be provided in order to serve new development. On-street parking would be located only on new streets. A total number of 880 parking spaces are anticipated to be provided in Zone 5, assuming 1 space per 1,000 square feet.</p>

<p>Built Form:</p>	<p>New construction along Park Place Street would take into consideration the relationship with the adjacent Park View neighborhood to the west and would be compatible with its residential character and scale.</p> <p>The maximum allowable height for new buildings in Zone 5 is proposed at 80 feet. However, upper floors of buildings overlooking the Lakes are required to have portions setback by 9 feet from the main building envelope in order to create an articulated façade. The height of new buildings on Park Place should match that of the existing buildings on the opposite side of the street. However, taller buildings if present would be established along Park Place Road. The upper floors of higher structures are required to be setback from the main building envelope by 9 feet at a height that maintains the street facade height continuity.</p> <p>To maintain a green buffer zone around Zone 5, new buildings fronting on Irving Street, Park Place and Pershing Drive are required to be set back by 18 feet from the site boundaries. These setbacks should be treated as front yards.</p>
---------------------------	---

Zone 6 Development Guidelines

<p>Historic Features:</p>	<p>Existing historic landscape features would be protected. This includes the intact tree line on Pershing Drive, the portion of the forested area falling within the northern boundary of Zone 6, and the forested strip between the Lakes and the Park Place. The historic fence along Park Place would be preserved and maintained.</p>
<p>Views:</p>	<p>Axial vistas from the Park View neighborhood through to the AFRH landscape should be incorporated into the new construction to preserve the traditional relationship between the historic residential neighborhood and AFRH. In particular, new construction, adjacent to the Randolph Street Gate House should preserve the axial view shed from Illinois Avenue into AFRH.</p> <p>The wooded triangular space that falls within the north boundary of Zone 6 would also be preserved in order to protect the views into the site from Grant Circle and the intersection of Rock Creek Church Road and Park Place.</p>
<p>Development sub-zones:</p>	<p>Zone 6 is divided into two sub-zones: Zone 6a (16 acres) to the east and Zone 6b (9 acres) to the west.</p>
<p>Open Space:</p>	<p>A green buffer space would be maintained along Park Place and Rock Creek Church Road. This effort would be in keeping with the width of the front yards across the street in the middle of the zone and with the forestation on AFRH-W at the north and south ends of the zone. The portion of the forested area that falls within Zone 6's</p>

	<p>southern boundaries would be treated as an integral part of the green buffer. A system of public and private open spaces that are compatible with the new street pattern would be provided in Zone 6a. Public open spaces would also be introduced following a similar pattern.</p>
Streets and Streetscapes:	<p>Street patterns and an axial orientation of the Park View neighborhood would be visually extended into Zone 6a in order to preserve the historical relationship between the residential neighborhood and the open land of AFRH.</p> <p>New roads within this zone are recommended to be of the Type 3 street sections. If Zone 6b is developed, the city grid would be continued to the western boundary of the golf course. New roads in this sub-zone could be more in keeping with the AFRH existing street pattern and do not necessarily need to continue the existing street pattern recommended for Zone 6a.</p> <p>The existing road between Zones 6a and 6b could be widened in order to provide sufficient vehicular access to new development. The width and treatment of this new road are recommended to adhere to Type 2 street sections.</p> <p>Establishment of a bike path is encouraged in this zone.</p>
Access and Parking:	<p>Buildings fronting on Park Place should have their main entrances from this street. Other buildings should have their main entrance and address from an open space.</p> <p>Vehicular access would rely on reactivated entrances to serve Zone 6. These are the entrances from Rock Creek Church Road and Park Place. Parking entrances will be from new streets and not from the historic loop. On-street parking and parking in the interior parts of the block would be provided.</p> <p>Parking demand calculation should be made on the basis of 1 space per 1,000 square feet for residential use.</p>
Built Form:	<p>The height and of new construction would be rise no more than 40 feet on Park Place but could go up to 85 feet in Zone 6b. Specifically, the height of new buildings on Park Place would match that of the existing buildings on the opposite side of the street.</p> <p>Upper floors of higher buildings are required to be setback from the main building envelope by 9 feet at a height that maintains the street facade height continuity. Floor levels overlooking the Lakes are also required to be setback by 9 feet from the main building envelope. Given the elevation change, higher buildings in Zone 6b would not have a visual impact on the existing residential fabric of nearby areas.</p>