

STAFF RECOMMENDATION

E. Keller

NCPC File No. MP 108



FORT LESLEY J. McNAIR
SUBAREA MASTER PLAN FOR THE NATIONAL DEFENSE UNIVERSITY
4th and P Streets, SW, Washington, DC

Submission by the Department of the Army

December 30, 2003

Abstract

The Department of the Army proposes to update and revise, through a Subarea Master Plan, a portion of the Fort Lesley J. McNair (Fort McNair) overall comprehensive Master Plan to address improvements and additional land acquisition options now under full consideration within the Department of the Army. The Subarea Plan will be a tool for Fort McNair decision makers to ensure compatible long-range future development of assets at the post in regard to the National Defense University and the establishment of new buildings at Fort McNair. In the near-term, only a limited number of projects are identified by the new Plan for implementation.

Commission Action Requested by Applicant

Approval of the Subarea Master Plan pursuant to 40 U.S.C. § 8722 (d) and Section 5 of the National Capital Planning Act (40 U.S.C. § 8722(b)(1))

Executive Director's Recommendation

The Commission:

Approve Plan 2 for the Subarea Master Plan for Fort McNair located at 4th and P Streets, SW and **fully support** the Army's acquisition of the 8.5 acre site, know as Tempo C, as presented in the drawings and report titled, *Small Area Plan for the National Defense University / Physical Fitness Complex* dated July 2003, **except for** the identified surface parking spaces and parking structure locations.

Requires that the Army:

- Designate an Employee Transportation Coordinator (ETC) at Fort McNair to initiate the programs outlined in the 1996 Transportation Management Plan (TMP).

- Prepare an action plan for Fort McNair detailing how the employee parking ratio of the Commission's Comprehensive Plan will be met. This action plan should be completed within one year, or prior to the submission of the preliminary design of the PFC.
- Submit a revised parking plan for Commission approval within one year or with the submission of the preliminary design of the PFC. The revised parking plan must include:
 - An updated employee survey.
 - A commitment to undertake specific TDM strategies.
 - Updated data on the feasibility and frequency of public bus service to the Fort McNair site.
- Submit a revised land use plan for Fort McNair formally identifying and recording the land use areas established by the Army's new Subarea Plan. This land use plan should be completed concurrent with the submission of the preliminary design of the PFC and accommodate the presence of the planned Anacostia Riverwalk and Trail at the 2nd Street right-of-way when establishing the perimeter gate entrance and base boundary.

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BACKGROUND AND STAFF EVALUATION

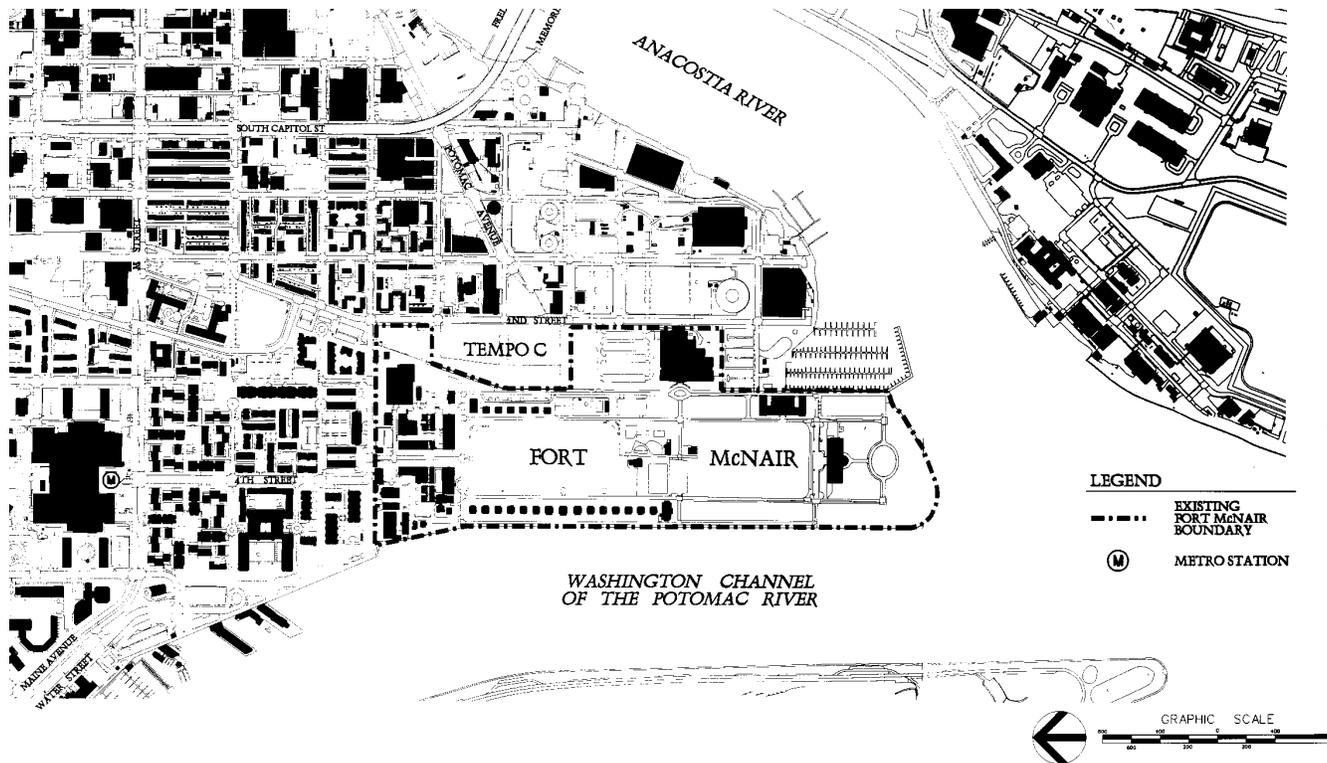
DESCRIPTION OF PROPOSAL

The submitted proposal is a Master Plan update for a specific area regarding land use and physical development at the post, and has been prepared for the Commander, U.S. Army Garrison, Fort Myer Military Community (FMMC). Fort McNair is an ancillary-post of Fort Myer Military Community, within the command of the Military District of Washington (MDW). As of October 2002, the Northeast Regional Office of the Installation Management Agency (IMA) in the Army assumed responsibility for the management of the installation's real property and physical facilities.

The primary mission of Fort McNair is to support the assigned and attached personnel stationed at the post facilities including, the National Defense University (NDU), the Inter-American Defense College, and Headquarters for MDW. Other organizations receiving support from Fort McNair are "The Old Guard" ceremonial regiment. The post also provides housing for general and flag officers assigned to the Department of Defense. The military post is the third oldest U.S. Army post in continuous active use in the United States.

Fort McNair is located in the southwest section of the District of Columbia and is bounded on the north by P Street, on the south by the confluence of the Anacostia River and the Washington Channel of the Potomac River, on the east by Buzzard Point, and on the west by the Washington Channel. Fort McNair was designated in the L'Enfant Plan as a military facility and one of the 16 original focal points of the plan. In 1903 the post was redesigned by the renowned architectural

firm of McKim, Mead, and White into the Beaux-Arts campus setting that is visible today with its strong emphasis on building patterns.



GENERAL LOCATION OF FORT McNAIR

The submitted proposal is a Subarea Plan that updates previous planning, which was completed in 1996. This Subarea Master Plan incorporates text now required by Army Regulations and supports revised initiatives, which although initially identified in the 1996 base Master Plan, may now be altered to a degree that required comprehensive study. Through this process, Fort McNair promotes efficient facility and land development that minimizes maintenance costs, maximizes quality of life factors for military personnel, and achieves Army mission goals.

The intended implementation of the submitted Fort McNair Subarea Plan would include the following actions:

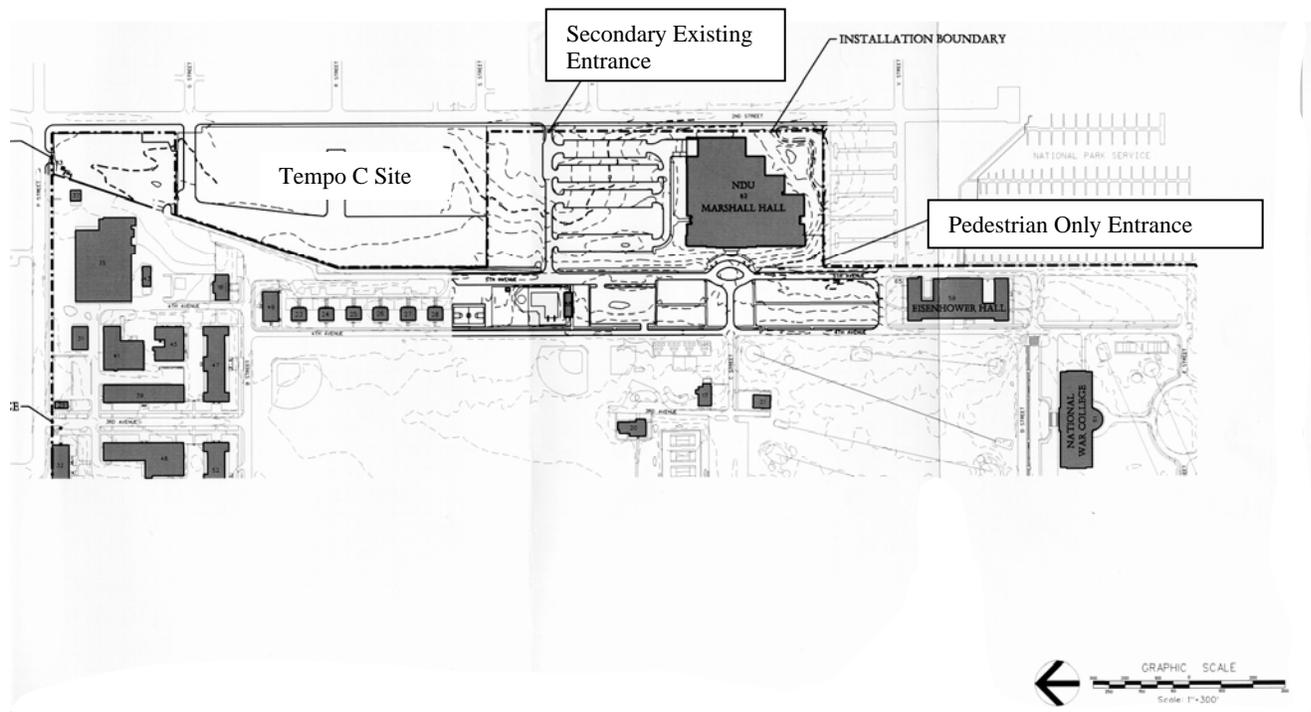
- A new primary entrance gate for the fort at 2nd Street, SW.
- Expansion of the NDU campus facilities.
- Accommodation of the final location of the Physical Fitness Center (PFC) planned at Fort McNair.
- Acquisition of approximately 8.5 acres of additional land directly adjacent to and east of the Fort’s perimeter boundary.

- Improved aesthetics, environmental quality, and pedestrian setting of Fort McNair through landscape/streetscape design.
- Additional NDU parking.

The proposed Subarea Plan revision alludes to seek a reduction in employee vehicle use by maintaining the Transportation Management Plan (TMP) initiatives of the 1996 Master Plan. But the concepts presented in the Plan support only a 1:2 employee parking ratio versus the required 1:3 employee parking ratio of the Commission Comprehensive Plan.

The new access gate and security improvements are features that most likely would be the first implemented projects of the Plan for the near-term along with construction of the PFC. Other projects, mentioned above, have not all secured funding and are anticipated for planning purposes only.

In addition, the Fort McNair Subarea Plan notes that due to a moratorium on the acquisition of additional military land in the National Capital Region by the Department of Defense, a waiver must be secured for the Secretary of Defense to obtain the additional 8.5 acres known as the Marianni Site, or Tempo C site. The Army in the submission of the Subarea Plan provides two development scenarios for Commission consideration, requesting comment on both schemes. From the Army's standpoint, however, the acquisition of the Tempo C area is the preferred action and the waiver to achieve that goal has been secured from the Defense Secretary with the decision to obtain the land for Department of Defense purposes approved.



POTENTIAL LAND ACQUISITION – TEMPO C

Because the NDU would become the largest activity at the post, (although HQ MDW, senior officer housing, and Old Guard ceremonial functions in support of the White House will continue) much of the Subarea planning focuses on NDU expansion. The Plan is phased in two parts. Phases are identified as shown in the table below.

FORT McNAIR SUBAREA PLAN PROGRAM

Proposed Facilities	Proposed GSF	Required Parking Spaces	Proposed Parking Spaces	Comments
PHASE I				
Physical Fitness Center	43,600	70	70	One high story with mezzanine, approx. 2-story equivalent
NDU Expansion	216,000	335	335	Three Stories
Surface Parking Total	220,000	653	653	Existing 248 + new NDU 335 + PFC 70 @ 335sf/space = coverage of 218,755 sf
Entrance Gate	33,750	-	-	From 2 nd Street (approx. 150' x 225')
PHASE II				
Parking Structure	300,000	N/A	850	Four Tiers – 2 below/2 above ground. Replaces surface parking. 75,000 sf footprint.
Outdoor Swimming Pool Area	45,000	-	-	Area approx. 150' x 300' Incl. terrace and bathhouse
Additional Future Expansion of NDU	100,000	155	155	

CONSULTATION WITH DEPARTMENT OF THE ARMY

U.S. Army personnel contacted staff in December 2002 and in January 2003 about issues of the Subarea Plan. These conversations resulted in defining the general scope of the plan's revisions and also assisted the Army in:

- Identification of the Subarea Plan environmental status.
- Discussion of revised Plan with the District of Columbia Office of Planning to identify issues of potential concern.
- Development of detailed traffic evaluations of characteristics of the Plan.

COORDINATION

The District of Columbia Office of Planning (DCOP) was provided copies of the Subarea Master Plan on July 8, 2003 with the request for comment by August 13, 2003. While DCOP did not take the opportunity to respond to the NCPC request for comment, the DCOP staff did provide a copy of that office's June 30, 2003 comments (see attached) on the Army's environmental document in accordance with the provisions of the National Environmental Policy Act. The following are the main points of DCOP's observations:

- DCOP supports the potential for a new access gate to the post at the preferred location of the centerline of Potomac Avenue.
- The full emphasis that it is critically important that adjacent streets leading to any relocated gate be adequate to handle new traffic patterns and volumes, including pedestrian and bicycle access.
- DCOP notes that 2nd Street, SW is a segment of the Anacostia Riverwalk and Trail from P Street to the James Creek Marina at the end of 2nd Street. Any perimeter, gate entrance and base boundary realignment must accommodate the presence of the planned trail at the 2nd Street right-of-way.
- The proposed PFC project in the Subarea Plan should take advantage of the access to the Anacostia Riverwalk.
- DCOP believes the programmed use of the Subarea Plan should include a dormitory or other residential use that would provide a transition activity, less intense or institutional, toward the community and street.
- It is crucial that the security perimeter of the Subarea Plan have an inviting and community friendly appearance that does not negatively impact the development potential of private sites on the eastside of 2nd Street, SW.
- The Army must consider actions that do not replicate the blank façade walls and buildings at the post along P Street. A varied and interesting street wall, with façade treatments and visual openings, would be a significant benefit.
- While DCOP recognizes the use of automobiles will occur as a method of access to the post, equal planning for other transit modes and the encouragement of employees and students to use alternatives modes of transportation should be achieved to include:
 - Pedestrian access via walkways that are safe and well planned
 - Promote the use of the transit subsidy program of federal employees
 - Provide amenities for bicycle commuting such as shower areas, changing rooms, and secure bike lockers or other storage areas.

Coordinating Committee

The Coordinating Committee reviewed the proposal on August 13, 2003. The Committee forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies participating, except the D.C. Office of Planning. The representative for the D.C. Office of Planning withheld coordination pending the inclusion of a hiking/biking trail contemplated by the Office of Planning in the vicinity of 2nd Street, SW. Subsequent to the meeting the representative concurred in the coordination of the project while

noting that future project design issues at the location should address and accommodate the presence of the planned Anacostia Riverwalk and Trail at the 2nd Street right-of-way when establishing the perimeter gate entrance and base boundary. Attending the meeting were representatives of NCPC, the District of Columbia Office of Planning; Fire Department; the General Services Administration; the National Park Service; and the Washington Metropolitan Area Transit Authority.

PREVIOUS COMMISSION ACTION

The Commission at its meeting of December 5, 1996 commended the Department of the Army for its Cultural Resource Management Plan (CRMP), a document used to guide future protection, development, and maintenance of historic buildings; approved the Revised Master Plan for Fort McNair, SW, Washington, D.C., as shown on NCPC Map File No. 24.50 (05.12)-40285, and strongly urged the Army to implement the Transportation Management Plan (TMP) with the objective of eliminating excess surface parking; and to work with the District of Columbia Office of Planning and NCPC to develop a long-term plan that will allow continuous public access along the waterfront, which is an important concept expressed in the Commission's draft Monumental Core Framework Plan, "Extending the Legacy."

On August 7, 2003, the Commission approved the design concept for a PFC at Fort Lesley J. McNair, 4th and P Streets SW, Washington, D.C., as shown on NCPC Map File No. 24.50(08.21)-41206.

URBAN DESIGN AND SECURITY PLAN

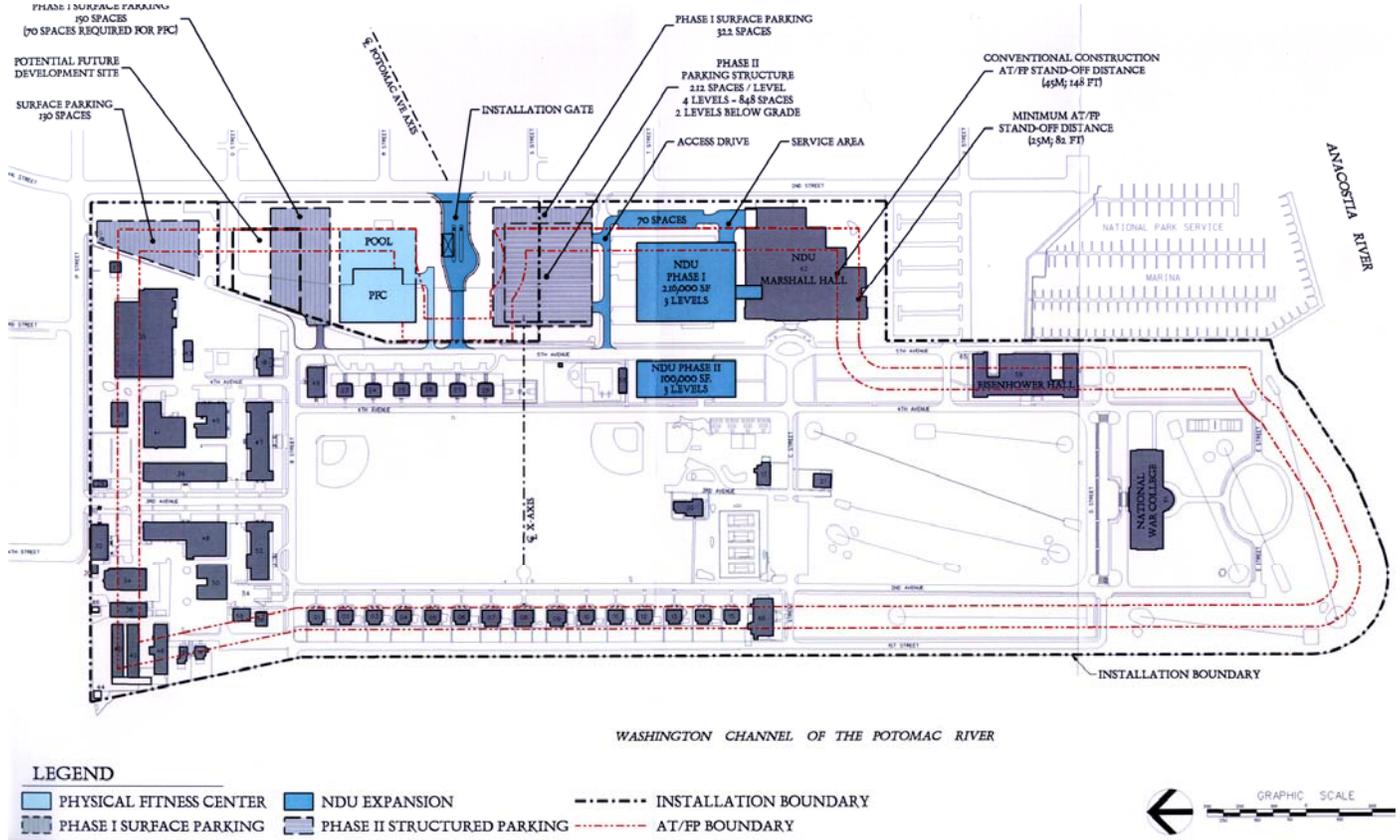
The submitted plan has undergone security review and analysis by Fort McNair personnel to meet the objectives of the Department of the Army for force protection measures. Setbacks of proposed building locations have been identified and implemented in the concept plans and control points and/or inspection points for both pedestrian and vehicle traffic have been conceptually established.

One goal described in the Urban Design and Security Plan (UDSP) is to seamlessly incorporate building and perimeter security into the designed streetcapes of the city. The subarea plan demonstrates this intent by providing setbacks at the street edge, the allowance for street furnishings, and the definition of a base perimeter that could incorporate streetlights, walls, planters, gates, fences and pedestrian seating areas as design refinements progress.

Additionally, a detailed traffic analysis has been undertaken to identify enhanced circulation of adjacent public travel ways, which is an identified objective of the UDSP. Moreover, the subarea plans consider the diagonal presence of Potomac Avenue, SW as a potential new focal point for the new post entrance. This effort conforms to the objective of the UDSP to make whole these vestiges of the L'Enfant Plan to improve traffic and security response accessibility.

Finally, in so far as the Subarea Plan lies south of the Southwest Federal Center, the Army has relied on the objective in the UDSP, which notes "Streetscape design should also be developed and evaluated in relation to existing urban design projects...such as the Southwest Waterfront

Study as well as larger planning ideas for the city.” The Army and its design team have made a concerted effort to review, incorporate, and analyze the input of the District’s Plan for the Anacostia Waterfront Initiative and have coordinated the Subarea Plan with the Office of Planning to make known the joint concerns of that office.

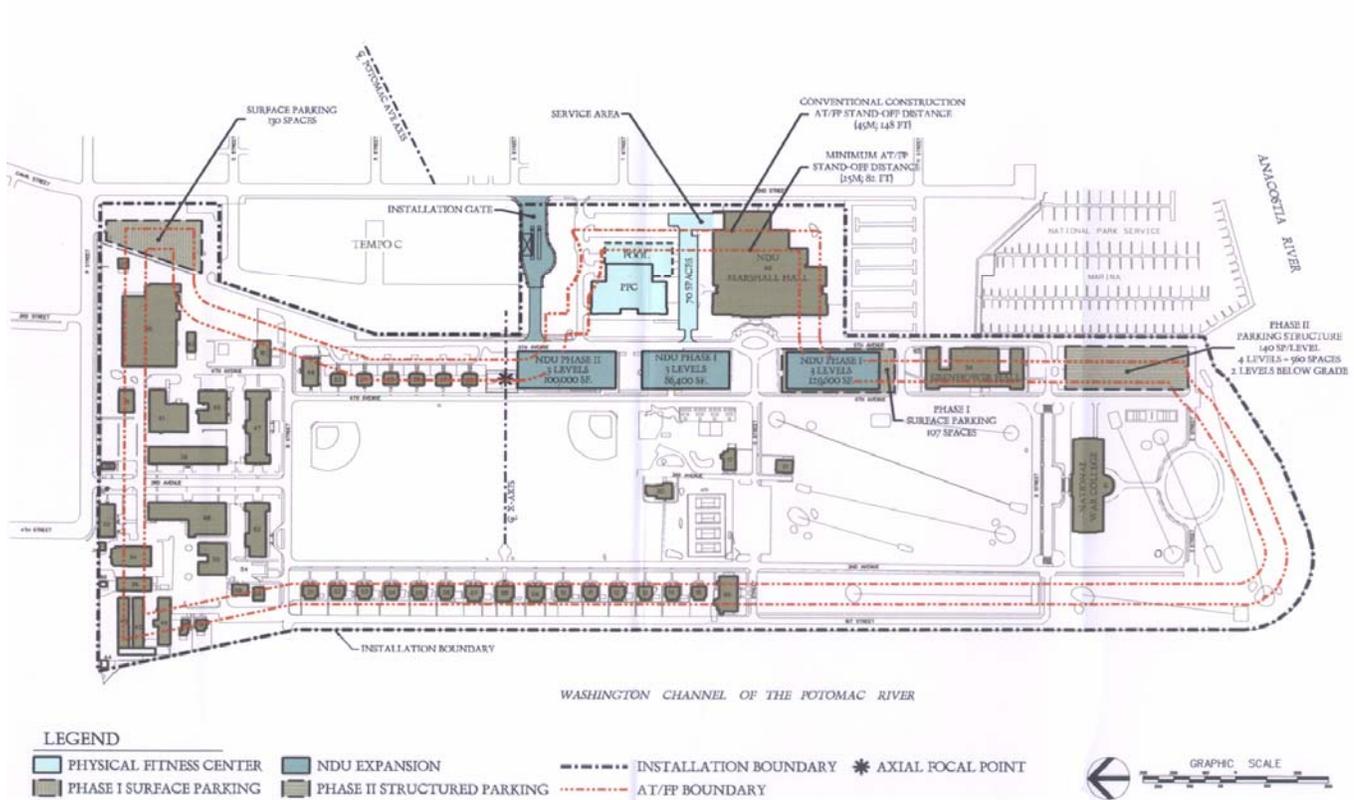


PREFERRED SUBAREA MASTER PLAN – PLAN 2

EVALUATION

Finding that within the Subarea Master Plan most major issues are addressed by the Army, **staff fully supports the land acquisition initiative** and **recommends approval** of the submitted Subarea Master Plan, Plan 2, with conditions. Although the general basis of either of the development scenarios of the provided plans are generally acceptable, clearly Plan 2 is the stronger and more physically compatible plan that achieves urban design objectives which support aims of both the Commission and the District. Staff observes that Plan 2 presents:

- A stronger access location for a new gate in context with the City street grid and major view and access corridors of the L’Enfant Plan. The plan locates the gate at or near Potomac Avenue, SW. supporting the opportunity for varied visual treatment.
- The exterior and urban development forms and guiding concepts, which are adhered to as long-term implementation aids, unify the physical character of the campus and include force protection specifications.
- The buffer areas established in the plan configuration respect and maintain the historic district boundary along the northern and eastern edges of the post.
- Scales the massing of all new large facilities to the eastern core of the campus, allowing greater openness near the river shore environs.
- Presents a greater new “street presence” physical appearance compared to Plan 1 where the development assigns a more open space character to the perimeter of the Subarea Plan, thus making it less activated.



ALTERNATIVE SUBAREA MASTER PLAN – PLAN 1

In comparison, Plan 1 places much of the new proposed construction internal to the campus, adjacent to the campus parade ground, and begins to step the massing away from the central axis vicinity outward to the perimeter of the post. The basic characteristics of Concept 1 achieve the following:

- Scales the massing to achieve all low horizontal building forms near the historic central area.
- Provides a stronger building-wall that reinforces the original intent to have buildings occur along the axis.
- Presents smaller scale building configurations that can be more easily phased and places the larger massed buildings to the background perimeter of the campus.
- Requires the placement of planned structures and surface parking closer to the river shoreline, affecting existing view corridors to and from the Potomac and Anacostia rivers.
- Allows the potential of large private development buildings to overshadow the campus of Fort McNair.
- Presents a force protection post perimeter area that would preclude any future placement of structures.

Staff believes that implementation of the Subarea Plan 2 will result in an improved installation design and provide for the required new construction of buildings, vehicle and pedestrian circulation, and landscaping.

The Army advises that with the Secretary of Defense approval of the Tempo C acquisition the proposed PFC would be relocated within land acquisition area under Plan 2, and a future addition to Marshall Hall would be located where the PFC is currently proposed. The PFC concept plan was seen by the Commission this past August 2003 and would require re-submission as a revised concept and preliminary plan.

While encouraged by Plan 2, staff also believes the commitment to the TMP objectives of the Plan must be further pursued given the increase in parking specified in the Plan. The current submission does not demonstrate compliance with the commitment expressed by the Army in 1996 to adhere to the TMP objectives spelled out at that time. The plan provides 158 net spaces for employee-use by a potential 342 employees. To achieve the TMP objectives, the staff requests the Commission direct the Army to secure the duties of an Employee Transportation Coordinator (ETC) to implement the necessary TMP objectives at Fort McNair. The Army is reminded that the traffic management requirements for the post were formalized and approved by the National Capital Planning Commission in December 1996 and the Army at Fort McNair should demonstrate adherence to the Commission specified ratio of 1 parking space per three employees. And while clearly the need for student parking spaces drives the current deficit of parking (over 1,885 current students attend the NDU facilities at any one yearly term or session of instruction) the added parking in the Subarea Plan does not correctly account for employee parking in compliance with Commission requirements.

Finally, the accompanying traffic analysis of the Plan suggests improvements in both signalization at 4th and M Streets, SW and improvements at the intersection of 2nd and P Streets with Canal Street that are necessary to accomplish an acceptable traffic flow. The study also strongly suggests the key component to successful employee parking and travel management program at Fort McNair is maintenance of the goals of the TMP.

CONFORMANCE

Anacostia Waterfront Initiative Plan

Fort McNair, in the context of the Anacostia Waterfront Initiative is located between two main target areas of the plan. The Anacostia Waterfront Initiative in this area of the city envisions the Southwest Waterfront, as a redevelopment framework for nearly 50 acres of waterfront in the Southwest quadrant of Washington, functioning as a major focal point for growth. The plan envisions replacing parking lots and underutilized streets with a mix of public plazas, cultural venues, restaurants, shops and residences to create a vibrant neighborhood and regional waterfront destination. The proposed uses include more than 2 million square feet of new construction including 14 acres of new parks along the waterfront – three times the existing open space. To the east of Fort McNair, the South Capitol Street Plan would become a grand symbolic gateway into the heart of Washington, highlighting a mixture of new uses and new jobs. Transformed into a great urban boulevard, the redesigned South Capitol Street is envisioned in the Plan to provide a gracious environment for a variety of transportation modes. With a new signature bridge replacing the aging Frederick Douglass Bridge, the reconfigured corridor will improve access to the Anacostia River.

Specifically, in the context of the Initiative at Fort McNair, a street-plan bikeway corridor or trail is located on Second and P Streets, SW. The bikeway corridor is addressed as a pedestrian environment connecting the two planning areas noted above. Staff believes, as noted by the District Office of Planning, that the street corridor adjacent to the proposed new Fort McNair east gate can accommodate the location and design of the desired bikeway/pedestrian walkway presented in the Anacostia Waterfront Initiative. The Army has acknowledge the desired presence of the pedestrian/bike walkway and will investigate its accomplishment adjacent to the east boundary of the Subarea Plan in further design implementation initiatives when individual planned projects at the post are accomplished. Such an effort would address the following:

- A secured integration of the force protection measures with a streetscape design that does not negatively impact the Second Street, SW corridor.
- Establishment of perimeter design features that take advantage of access points to the proposed Riverwalk and Trail.
- Providing an activated, appropriately coordinated, and quality designed east perimeter character that allows visual openings, establishes pedestrian amenities, and provides a truly well-thought out system to accommodate, but not over burden, the new gate functions of vehicle, pedestrian, and bicycle access.

National Historic Preservation Act

The Fort McNair Historic District (comprising a significant part of, but not all, of Fort McNair) was determined eligible for listing in the National Register of Historic Places in 1977. Building 61, the National War College, was listed as a National Historic Landmark in 1972.

The Army has developed a CRMP, a document used to guide future protection, development, and maintenance of historic buildings in 1996. The Army also established Installation Design

Guidelines (IDG) for Fort McNair. The IDG is consistent with the Secretary of the Interior's Standards and Guidelines for treatment of historic properties. The Subarea Plan has been developed using the goals of the CRMP, as described in Army regulations, to achieve desired planning principles.

The Army has consulted with the D.C. State Historic Preservation Office (DC SHPO) about the alternatives under consideration in the Subarea Plan. The DC SHPO responded to the Army by letter dated July 10, 2003, stating that its preferred alternative was 2-2, because it took advantage of the potential to site most of the proposed facilities on the Tempo C parcel and adjacent sites. The placement of the new buildings eastward of the east wall (outside the historic boundary of the fort) would “tend to constitute no adverse effect” on the historic properties therein. (Conversely, alternative 2-1, with its large parking garage near the National War College, would undercut the College’s visual prominence as the focal point of the south end of the parade ground and its central placement in the McKim, Mead, and White plan.)

The SHPO commented further about the demolition of portions of the boundary wall along 5th Avenue, supporting the practical and reasonable demolition of portions necessary for providing free passage, but urging that as much of the historic wall be preserved as possible, particularly in the area to the east of buildings 18, 23-28, and 49.

Further, the SHPO noted the potential for uncovering or disturbing portions of the Washington City Canal east of the fort’s historic boundary within the Tempo C site and adjoining parcels. The Army will need to factor archaeological evaluations into its future project planning.

The Army and the DC SHPO have also consulted specifically on the fitness center and the expansion of the NDU and will continue to consult as that and other projects within the Subarea Plan are developed.

National Environmental Policy Act

NCPC staff has analyzed, in conformance with the requirements of NEPA, the prepared Environmental Assessment (EA) completed by the Department of the Army, Baltimore District Corps of Engineers and approved by the Fort McNair Garrison Commander. Staff prepared a Finding of No Significant Impact based on adoption of the EA. The EA was completed in July 2003.

The EA reviews three alternatives for implementing the Master Plan. The preferred alternative of the Plan, a lease alternative, and the “No Action” alternative were evaluated by the NEPA effort to demonstrate the range of potential future projects, but implementing only portions of the plan, depending on ultimate federal funding and decisions by the Secretary of Defense. The EA addresses the potential environmental impacts of Subarea changes and their general ramifications in terms of the future siting, design, and construction of new facilities.

The existing environment of Fort McNair has essentially remained consistent since the Army upgraded some of the facilities in the 1970s and 1980s, along with the master plan of 1996. A major new expansion of the National Defense University located at the post is anticipated. The fort is within the District of Columbia and is located in the drainage watershed of the Anacostia

and Potomac rivers. Since stormwater pipes enclose most existing drainage at the site, no major constraints effect the preferred plan or are significantly impacted by it. All new proposed buildings that comprise the Subarea project area are outside, but closely adjacent to, the 100-year floodplain of the Potomac and Anacostia.

Issues of the environmental review focused primarily on minor alteration of site topography, minor erosion impacts from construction, cultural/architectural resource effects, and hazardous materials. The potential impacts and mitigation measures identified for the proposed Subarea Plan include:

- **Topography:** Activities associated with implementing the Master Plan would minimally modify topography and would have minor to moderate adverse effects, particularly on the east side of the installation where some natural topography remains largely intact. Careful site selection and ultimate location of the structures would mitigate some aspects of the effects, plus sediment and soil disturbance problems would be minimized by use of Best Management Practices complying with District of Columbia *1987 Standards for Soil Erosion and Sediment Control*. Erosion and sediment control measures will be implemented and demonstrated in final individual project construction drawings reviewed by Commission staff.
- **Soils:** Activities associated with implementing the Plan would result in some soil disturbance and the potential for some short-term erosion during construction. Erosion problems would be minimized by use of Best Management Practices as referenced above.
- **Surface Water:** Any increase in sediment loading into the Anacostia drainage watershed during construction would be minimized by employment of Best Management Practices as indicated above. Because much of the proposed construction varies in total size and nature, measures would include sediment fence barriers, straw bale water flow barriers, stone vehicle-wheel sediment traps, and small sediment detention ponds. With the addition of new structures, parking and roadway surfaces, water runoff from the site would be slightly increased. District of Columbia stormwater management objectives would be adhered to with the introduction of small detention basins, additional catch basins and vegetated swales.
- **Ecological Resources:** Activities associated with implementing the Plan would result in the loss of several trees and a number of other landscaping elements at Fort McNair in the areas near or adjacent to the newly acquired Tempo C site if that is achieved. New landscape plantings would follow in the context of the Subarea Plan urban design framework. A vegetation buffer would be maintained along Second Street, SW.
- **Transportation:** Activities associated with implementing the Subarea Plan would result in minor transportation impacts. Planned improvements are proposed for a new main gate intersection at Second Street on the east side of the Post. All new proposed roadway improvements would incorporate pedestrian and American Disabilities Act requirements for improved access to public walk areas. New heavy-vehicle security checkpoints for deliveries and visitors to the fort would be established with the plan that would assist in the removal of current traffic back-ups at the existing 4th and P Street gate area. Nearby city street intersections that would include improvements are limited to one at Canal and 2nd Streets, SW.

- **Socioeconomics:** There would be no disproportionate impact on minority or low-income populations. The local neighborhood business's or community's productivity remains unaffected.
- **Cultural/Historic Resources:** The Subarea Plan has actions that qualify as "undertakings" pursuant to Section 106 of the Historic Preservation Act. Several of the actions will require separate Section 106 compliance efforts that will be achieved when the project's specific characteristics and effects of design are determined. As a whole, the Plan would have long-term, minimal, and potentially not-adverse effects on cultural/historic resources of Fort McNair. These proposed actions will be further defined through consultation, pursuant to Section 106, between the DCSHPO and the Department of the Army for the development of Memoranda of Agreement on the efforts and activities that may affect newly acquired areas of potential archeological importance and affirm minimal effects on the historic areas of the Fort McNair property. Initiation of consultation with the District of Columbia Historic Preservation Officer began April 2003 with a response from the DCSHPO in July. It is understood by the Army that long-term modifications to the overall historic character of the base would be addressed in the Memoranda of Agreement.
- **Noise:** Noise would be generated by construction equipment. Temporary impacts would be minimized with noise control equipment installed on construction vehicles and restricting construction to daytime/weekday hours.
- **Hazardous Materials:** Since soil borings in the Subarea project boundary detected contaminated fill material, there is the possibility that soils could be contaminated by manmade compounds. Environmental soil sampling and testing of areas would reveal contaminant levels, whether they exceed EPA health and safety thresholds, and whether the soils require remediation prior to disposal at an appropriate landfill. Should contaminants be found, the excavation and disposal efforts would be monitored by appropriate District of Columbia government officials. To minimize the potential adverse impacts on hazardous materials that could result from the implementation of the Fort McNair Subarea Plan, the following mitigation measures would be provided in the submission of project plans to NCPC review staff, coordinated with the District of Columbia Environmental Health Administration, Hazardous Waste Division and the District of Columbia Department of Consumer and Regulatory Affairs, in demonstrating a written plan:
 - To remove and contain hazardous waste materials including asbestos-containing materials (ACM), lead-based materials consistent with applicable handling regulations by licensed contractors and trained personnel, and the removal of hydrocarbon hazardous substances.
 - To accomplish environmental soil testing for contamination that includes analysis of soil samples by a certified lab, and development of provisions for removal and containment consistent with applicable regulations.
 - To collect, transport, and dispose of asbestos- or lead-bearing waste by a specially licensed contractor in accordance with the requirements of Title 40 CFR Volume 23 Part 763.
 - That addresses hazardous materials to be removed and which would be shipped, consistent with applicable transfer regulations and procedures, to a hazardous

waste disposal facility. There are a number of such facilities in the surrounding states that are licensed to handle such material.

- To segregate wastes to reduce quantities of hazardous waste.
- To haul hazardous wastes by a licensed hazardous waste hauler with permanent labeling.
- To dispose of hazardous and non-hazardous waste in accordance with all federal, state, and local regulations.

Staff finds the minor environmental effects and their mitigation supportable and fully defined by the EA evaluation. The separate National Historic Preservation Act, Section 106 review and mitigation actions will be further defined by additional analysis and design efforts in consultation with the District of Columbia Historic Preservation office, and Memoranda of Agreements developed as required. Staff believes the Army determination is an ample review of the requirements of the Subarea Plan and supports its implementation of the mitigation actions identified above.

Federal Capital Improvements Program

The Subarea Plan undertaking was not included in the Federal Capital Improvements Program (FCIP), Fiscal Years 2003-2008 adopted by the Commission on July 11, 2002. This work is an internal Army planning tool to identify potential projects that the Army would consider for submission to a future FCIP schedule for NCPC consideration.

Three specific projects are identified in the FCIP that are included in the 1996 Master Plan. These projects include:

- A 5,300-square-foot new chapel that would be developed at a site subject to the Army's acceptance of a Subarea Plan. The cost of the proposal may approach \$2,250,000.
- A 41,000-square-foot renovation effort at Building 52, the Inter-American Defense College building at a cost of \$10,450,000.
- A 83,000-square-foot renovation of the existing Military Police Barracks located in the historic district of Fort McNair, at a estimated cost of \$500,000.

Comprehensive Plan

The proposed Subarea Plan is consistent with the Comprehensive Plan for the National Capital. The Federal Facilities element designates the installation for National Defense Facilities. Fort McNair is a historic district and is designated as a Special Place in the Preservation and Historic Features element. At least two major new buildings are proposed for construction along with the establishment of a new entrance gate to the post. Policies in the latter element apply to the proposed improvements:

- The distinguishing original quality or character of Historic Properties should be protected. The removal or alteration of any historically valuable material or distinctive architectural features should be avoided when possible and kept to a minimum when required for continued use. The design of additions should be

compatible with the height, scale, materials, color, texture, and character of the Historic Property.

- New construction on Historic Landmarks or in Historic Districts should be compatible with the historical architectural character and cultural heritage of the landmark or district. In design, height, proportion, mass, configuration, building materials, texture, color and location, new construction should complement these features of the landmark or district, particularly features in the immediate vicinity to which the new construction will be visually related.
- Existing Special Places should be protected, enhanced, and strengthened. New ones should be created as new activity centers are developed or neighborhoods revitalized. Historic plans and their underlying principles should be used for guidance in planning major improvements. Civic art should be used to enrich such places and to establish their identity and image.

The proposed Plan does not take into full account that the Comprehensive Plan's employee parking standard for the facility, which is one employee parking space per three employees. The Plan indicates that an expected 2,254 parking spaces are needed to accommodate employees and students. The parking standard would permit up to a maximum of 114 employee parking spaces. This total does not preclude additional parking necessary to accommodate residents and visitors. However, the current Subarea parking plan provides approximately 158 additional net spaces for employee-use by a potential 342 employees. Fort McNair is well served by the Waterfront Metrorail station, Metrobus service, and shuttle bus service to and from Fort Myer.

The existing TMP from the 1996 Master Plan indicates that multiple strategies, including van and carpooling, transit subsidies, and expanded shuttle bus service, would be used to increase public transit usage and reduce parking needs. The Army should implement the approved 1996 TMP measures to achieve compliance with the Comprehensive Plan's employee standard. The expressed commitment in the TMP for a 25-percent increase in the average passenger occupancy is a goal of the TMP that would contribute significantly to the reduction of the employee parking needed and meet the goal identified by the Commission in 1996.