

ARMED FORCES RETIREMENT HOME MASTER PLAN

Armed Forces Retirement Home
General Services Administration
Washington, DC

May 19, 2022

Record of Decision

Statement of Decision

The National Capital Planning Commission (NCPC or the Commission) finds that the requirements of the National Environmental Policy Act (NEPA) of 1969 have been satisfied for the Armed Forces Retirement Home Master Plan as proposed by the Armed Forces Retirement Home (AFRH) and the General Services Administration (GSA). AFRH, acting as lead federal agency, along with the NCPC as the cooperating agency have prepared a Supplemental Environmental Impact Statement (SEIS) pursuant to the Council on Environmental Quality's (CEQ) Regulations of Implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508); NCPC's implementing regulations (1 CFR § 601); and the National Capital Planning Act (40 United States Code (40 USC 8722 (b)(1) (master plans) and (d) (individual projects) to evaluate the potential environmental impacts associated with implementing the Armed Forces Retirement Home Master Plan. The master plan alternative was selected through an Alternatives Analysis / Draft Supplemental Environmental Impact Statement, Final Environmental Impact Statement (FEIS), and National Historic Preservation Act (NHPA) Section 106 consultation process.

Due to the unique circumstances of the proposed private development land lease on federal property, NCPC, AFRH and the District Office of Planning (DCOP) entered into a Memorandum of Understanding (MOU) to articulate a development process for the site. The goal of the MOU is to establish a process for private development of Zone A at AFRH that complies with the legal obligations of all parties, is streamlined, and provides a basis for issuance and enforcement of land-use planning requirements and controls and building codes. For NCPC to meet its review requirement, a land-use plan must be submitted to NCPC that includes information that meets applicable National Historic Preservation Act (NHPA) and National Environmental Policy Act (NEPA) requirements. NCPC staff must review the plan and the Commission must review and approve the plan. To meet District zoning and building code requirements, a petition to zone the land must be filed with and approved by the Zoning Commission, subject to the NCPC review and comment process.

The U.S. General Services Administration (GSA) on behalf of AFRH prepared, among other things, a master development plan for the portion of AFRH's property to be

developed using AFRH's leasing authority. A Master Plan approved by NCPC in 2008 (and amended in 2018) (AFRH Master Plan) provides for mixed-use, private development comprised of residential, office, research and development, institutional, medical, and retail, as well as institutional uses for AFRH. The private uses, developed by a private sector developer, will generate income to supplement AFRH's trust fund, allow continuation of AFRH's operations, and ensure on-going provision of services to retired members of the U.S. Armed Forces.

NCPC, OP, and AFRH also sought a land use review process for the private development and use of Zone A that provided adequate opportunities for comment and input by all three agencies and the public. All parties seek a process that is predictable and straightforward. This unique hybrid planning-zoning process is not intrusive for the developer or AFRH because the AFRH-W Master Plan and all subsequent amendments have been or will be made in consultation with DCOP and approved by NCPC. Additionally, the approved AFRH Master Plan, as amended, has been used by DCOP to recommend updated policies to the District Elements of the Comprehensive Plan, which will in turn guide the Zoning Commission's consideration and adoption of zoning, as needed.

Project Background

In 2008, the National Capital Planning Commission (NCPC) approved the AFRH-W Master Plan, which divided the campus into two zones: the AFRH Zone and Zone A. In conjunction with that approval, AFRH issued a Record of Decision (ROD) to implement the Master Plan and then selected a developer to lease underutilized land and implement a mixed-use program consisting of commercial, residential, institutional and other uses. Implementation of the Master Plan, as it was originally envisioned, would have added approximately 6,459,369 gross square feet (gsf) of private development to the 350,000 gsf planned for the AFRH portion of the campus for a total of 6,835,848 gsf of development. However, the selected developer for the project and AFRH were unable to reach an agreement for the project to proceed.

In 2017, AFRH prepared a Draft SEIS for amending the AFRH-W Master Plan (Master Plan Amendment 1). The first amendment to the AFRH-W Master Plan changed the boundaries of the development zones to shift the three-acre Heating Plant parcel from the AFRH Zone to Zone A in anticipation of releasing a request for proposal (RFP) to solicit proposals and select a new developer to move forward with the mixed-use development. The Draft SEIS analyzed impacts associated with the proposed changes in Master Plan Amendment 1 to comply with NEPA. In addition, the 2017 Draft SEIS analyzed impacts resulting from changes that occurred on the AFRH-W campus since the previous 2007 FEIS, which included:

- demolition and replacement of the previous Scott Building in the AFRH Zone;
- a \$15 million restoration and expansion of the Lincoln's Cottage historic site;
- closure and anticipated reuse of the Heating Plant and inclusion of the Plant in the development area;

- elimination of development in Zones B and C (which were analyzed in the 2007 FEIS but not included in the 2008 Master Plan); and
- the anticipated development of the McMillan Reservoir parcel immediately south of AFRH-W along with other area development.

In addition, the 2007 FEIS was completed prior to Executive Order (EO) 13693, *Planning for Federal Sustainability in the Next Decade*; and EO 13653, *Preparing the United States for the Impacts of Climate Change*. Therefore, supplemental information was required to analyze the impacts of energy usage and alternate energy sources for the increased development footprint on the AFRH-W campus, as well as to analyze the impacts of the development on climate change in accordance with these EOs.

Supplemental information was required to analyze the impacts of these changes, particularly impacts from traffic, climate change, and greenhouse gas (GHG) emissions that may be generated by redevelopment of the AFRH-W.

Since the Draft SEIS was made public in 2017, AFRH released an RFP to solicit proposals and selected a new development partner to move forward with the mixed-use development in Zone A. AFRH Partners, LLC, a joint venture of Madison Marquette and Urban Atlantic, whose proposal for the redevelopment of Zone A forms the basis of the Alternative 3: Master Plan Amendment 2, was selected as the new development partner.

Purpose and Need of the Proposed Action

The purpose of the proposed action is to amend the AFRH-W Master Plan to sustain AFRH and its primary funding source, the AFRH Trust Fund.

AFRH has identified a need to leverage its land assets to generate revenue to support its current mission to operate a resident-focused retirement communities for military enlisted veterans at AFRH-W and in Gulfport, MS.

In 1991, Congress merged the United States Soldiers' and Airmen's Home (USSAH), financed via a Trust Fund established in 1851 with funds provided by Congress after the Mexican-American War, and the United States Naval Home, historically funded by Navy appropriations, into a new and independent executive branch agency (i.e., AFRH). In merging them, Congress stipulated that the USSAH's Trust Fund will become the single, primary, and self-sustaining funding source for both Homes *and* a new headquarters organization. It also changed the operating model, directing the new AFRH to provide healthcare, services, and accommodations much as the private sector offers at continuing care retirement communities (CCRC), rather than serve as a transient asylum for indigent retired enlisted personnel. As a result, today's AFRH is the federal government's *only* accredited and certified CCRC offering a continuum of five levels of care to eligible residents: independent living, independent living plus, assisted living, long term care, and memory support. This merger, without fundamentally changing the financing model in law, placed significant burden on the now-AFRH Trust Fund: to this day, AFRH is financially constrained in performing its broad, valued, and unique mission.

To counter the persisting annual operating losses, generate funds to address its capital crisis, and ensure the financial stability of AFRH for future generations of retired military personnel, AFRH is leveraging its leasing authority under Title 24 United States Code §411 and maximizing the value of its underutilized facilities and acreage on the Washington DC campus. AFRH issued a request for proposal in 2018 to lease 80 acres on the property for a mixed-use development, selected a master developer one year later, and anticipates executing a long-term ground lease in the second quarter of FY 2023. The AFRH-W Master Plan will guide this initiative, which is expected to be a significant new revenue source for AFRH for the next century.

This new development is AFRH's best opportunity to generate the predictable revenues necessary to continue providing the best housing and comprehensive support services in an independent living retirement community for America's retired enlisted personnel, and to develop future facilities for its changing population.

Rationale for Decision

This Record of Decision (ROD) documents the specific components of and reasons for NCPC's decision. This decision is based on analyses contained in the Supplemental Environmental Impact Statement (SEIS) issued March 2022; the Final EIS issued in 2007; the comments of NCPC, other Federal, State, and local agencies, members of the public, and elected officials; and other information in the administrative record. The decision to choose the Selected Alternative as the basis for NCPC's review of future projects involved balancing AFRH's goals, resource concerns and public interests. NCPC reached its decision after careful consideration of the environmental analysis of effects of the Action Alternatives and the No-Action Alternative in concert with the needs of the Armed Forces Retirement Home.

The Selected Alternative (Alternative 3) best meets the purpose and need, while balancing potential impacts. The Selected Alternative includes key measures to avoid and minimize impacts including:

- Minimizing impacts to the historic components of AFRH-W including adaptive re-use of buildings which contribute to the historic character of the site and retention of key landscape features such as the meadow on the southern portion of the site;
- Providing new construction that is compatible with surrounding land uses including placement of retail and commercial development along North Capitol and Irving Streets, and institutional uses around the AFRH office and residential areas;
- Providing park and open space amenities for AFRH-W residents and the surrounding community; and
- Providing commercial and retail opportunities to serve the surrounding community.

The master plan is a guide for project implementation over the next 20-30 years. Specific designs of each project in the AFRH Zone will be further assessed, including their impacts, when they are developed in detail. Individual projects in this zone will also require review

and approval by the Commission. Additional review, as required by NEPA and the Programmatic Agreement (PA) developed pursuant to Section 106, will be required at that time.

Selected Alternative Description

Alternative 3: Master Plan Amendment 2 includes development in the AFRH Zone and Zone A, and includes the development proposed by AFRH Partners for Zone A. The alternative does not include changes to the development plan or design guidelines for the AFRH Zone, and all substantive changes are limited to Zone A. The alternative accommodates minor changes to the parcel plan in Zone A, responds to changes in local planning strategies and priorities since 2008, and reflects a more objective-based and context-specific approach to design guidelines for new development in Zone A. The alternative also accommodates a small increase in density in Zone A, as well as more flexibility in use and product type while maintaining all previously approved guidelines related to height and viewshed protection. Development in Zone A, as proposed by AFRH Partners, provides 4.9 million gross square feet of mixed-use development consisting of residential, hospitality, office, and retail uses to generate income for the AFRH Trust Fund.

A summary of the development proposed in Master Plan Amendment 2 is included below in Table 11.

Table 1. Proposed Development for Alternative 3: Master Plan Amendment 2

| LAND USE | Height (# of Feet) | Gross Square Footage | Parking Spaces |
|----------------------------------|-----------------------|-------------------------|----------------|
| EXISTING & TO REMAIN | | 1,320,615 | |
| Institutional | | 1,320,615 | |
| AFRH Zone | | 398,000 | |
| North-Northeast (Institutional) | 55-85 | 350,000 | 700 |
| Chapel Woods (Residential) | 36 | 42,000 | 42 |
| Golf Course | | 6,000 | |
| Zone A (Development Zone) | 45-120 | 4,906,075 * | 4,844 |
| Residential | | 3,175,177 | |
| Commercial | | 732,846 | |
| Medical | | 319,077 | |
| Retail | | 253,297 | |
| Asst. Living | | 309,678 | |
| Hotel | | 116,000 | |
| TOTAL NEW DEVELOPMENT | | 5,304,075** | |
| AFRH GRAND TOTAL | | 6,624,690 | 5,586 |

*The breakout of land use square footages for the Development Area are approximations and subject to change in response to market conditions. The total number of parking spaces for Zone A will depend upon the final square footages associated with each land use and the applicable parking ratios, but will be capped at the value shown in the table above.

**Gross development square footage does not include above ground parking structures in Zone A; however, the EIS assesses the impacts of parking on the site.

Alternative 3 best meets the needs of AFRH and the objectives of the Master Plan including:

- Providing the best Master Plan to sustain AFRH and its primary source of funding, the AFRH Trust Fund;
- Maximizing development of AFRH-W while maintaining the historic character of the site and retaining significant existing open space;
- Providing development uses that are complementary to the Home;
- Ensuring that AFRH's facilities are conveniently located for its residents and that there is room for new AFRH facilities on the north campus;
- Providing for the security of the residents of the Home;
- Encouraging the rehabilitation and reuse of historic buildings;
- Integrating the landscape and the built form; and
- Respecting the character of the adjacent communities and integrating the new development into the city fabric.

Alternatives Considered

For this Final SEIS, AFRH considered three alternatives to develop AFRH-W to determine whether they were feasible and whether they would meet the project's purpose, need, and objectives. These alternatives, which are summarized below, proposed varying levels and types of development within the AFRH Zone and Zone A. In addition, AFRH reviewed alternatives previously considered but dismissed and confirmed those decisions to dismiss.

Alternative 1 - No Action Alternative

Under the No Action Alternative, the Selected Alternative would not be implemented. AFRH-W would remain entirely under federal control, with AFRH as the holding agency. No additional new construction would occur on AFRH-W, as proposed in the 2008 and 2018 and 2022 proposed updated Master Plans, under this alternative. The site would continue to be underdeveloped, with scattered, unused, and mostly non-revenue producing buildings. The facility would remain fenced and guarded, with entry from Rock Creek Church Road restricted to those with business on site. The No Action Alternative does not support the intent of the National Defense Authorization Act for Fiscal Year 2002, which allowed AFRH to sell or lease its underutilized land as a means to replenish the AFRH Trust Fund.

Under this Alternative, the opportunities to raise revenue for AFRH would be limited to the reuse of existing buildings, including the Grant Building, and the King Hospital

Complex. A total of approximately 538 parking spaces would be created to serve these buildings.

Alternative 2 – Master Plan Amendment 1

Alternative 2 is comprised of the development proposed in the 2008 AFRH-W Master Plan, as amended in 2018, and includes the adaptive reuse of the Heating Plant in Zone A. This alternative was partly studied in the 2007 Final EIS as Alternative 3A, which was selected for implementation in the 2008 ROD. Within the 2008 AFRH-W Master Plan, proposed development was eliminated from Zones B and C, between the golf course, and Rock Creek Church Road, to provide a buffer between the residential areas to the west and the new development on the southeastern portion of the site. The first amendment to the AFRH-W Master Plan changes the boundaries of the development zones to shift a three-acre Heating Plant parcel from the AFRH Zone to Zone A. Development in the AFRH Zone would take place as AFRH needs new facilities. The AFRH Zone is designated for institutional uses and new residential units compatible with AFRH-W operations. There would be moderate in-fill development within this zone. Development in Zone A would be undertaken by a private developer to generate income for the AFRH Trust Fund. Zone A is designated for residential, office/research and development, retail, hotel, and medical uses. This alternative was memorialized in the AFRH-W Master Plan Amendment 1.

A summary of the development proposed in Master Plan Amendment 1 is included below in Table 2.

Table 2: Proposed Development for Alternative 2: Master Plan Amendment 1

| LAND USE | Height (# of Feet) | Gross Square Footage | Parking Spaces |
|----------------------------------|-----------------------|-------------------------|----------------|
| EXISTING & TO REMAIN | | 1,319,239 | |
| Institutional | | 1,319,239 | |
| AFRH Zone | | 398,000 | |
| North-Northeast (Institutional) | 55-85 | 350,000 | 700 |
| Chapel Woods (Residential) | 36 | 42,000 | 42 |
| Golf Course | | 6,000 | |
| Zone A (Development Zone) | 45-120 | 4,403,083 * | 5,189 |
| Residential | | 2,280,477 | |
| Commercial | | 1,191,391 | |
| Medical | | 290,650 | |
| Retail | | 214,086 | |
| Asst. Living | | 214,000 | |
| Hotel | | 126,391 | |
| Heating Plant Area | | 36,088 | |
| Potential Future Retail | | 50,000 | |
| TOTAL NEW DEVELOPMENT | | 4,801,083 ** | 5,931 |
| AFRH GRAND TOTAL | | 6,120,322 | |

* The breakout of land use square footages for the Development Area are approximations and subject to change in response to market conditions. The total number of parking spaces for the Development Area will depend upon the final square footages associated with each land use and the applicable parking ratios.

** Gross development square footage does not include above ground parking structures in Zone A; however, the EIS assesses the impacts of parking on the site.

Alternative 2 addresses issues raised through community review, Section 106 consultation and NCPC actions on the 2018 Master Plan. From the revenue generating perspective, it includes a diverse program of uses, thus allowing for flexibility to adjust to changes in market conditions and demand for particular uses.

Alternative 3 – Master Plan Amendment 2

Alternative 3: Master Plan Amendment 2 includes development in the AFRH Zone and Zone A, and includes the development proposed by AFRH Partners for Zone A. The alternative does not include changes to the development plan or design guidelines for the AFRH Zone, and all substantive changes are limited to Zone A. The alternative accommodates minor changes to the parcel plan in Zone A, responds to changes in local planning strategies and priorities since 2008, and reflects a more objective-based and context-specific approach to design guidelines for new development in Zone A. The alternative also accommodates a small increase in density in Zone A, as well as more flexibility in use and product type while maintaining all previously approved guidelines related to height and viewshed protection. Development in Zone A, as proposed by AFRH Partners, provides 4.9 million gsf of mixed-use development consisting of residential, hospitality, office, and retail uses to generate income for the AFRH Trust Fund.

Alternative 3 best meets the needs of AFRH and the objectives of the Master Plan including:

- Providing the best Master Plan to sustain AFRH and its primary source of funding, the AFRH Trust Fund;
- Maximizing development of AFRH-W while maintaining the historic character of the site and retaining significant existing open space;
- Providing development uses that are complementary to the Home;
- Ensuring that AFRH's facilities are conveniently located for its residents and that there is room for new AFRH facilities on the north campus;
- Providing for the security of the residents of the Home;
- Encouraging the rehabilitation and reuse of historic buildings;
- Integrating the landscape and the built form; and
- Respecting the character of the adjacent communities and integrating the new development into the city fabric.

Other Alternatives Dismissed From Further Analysis in the EIS

Four alternatives were considered in the original EIS in response to suggestions from stakeholders but were not included for further analysis are described below.

Seek Congressional Appropriations

Prior to the 2007 FEIS, AFRH had never had direct Congressional appropriations and had been directed by Congress and the DoD to manage its Trust Fund and operate on a self-sustaining basis. It is highly unlikely that AFRH would become a fully taxpayer-financed agency, especially given the magnitude of funding required for its capital program, existing budget deficits, and current military spending priorities. AFRH has in the past sought legislation that would incrementally increase returns on its Trust Fund by allowing AFRH to invest in vehicles other than Treasury bills, as it is currently limited to, but no legislation of this type has been passed; even if it were, returns would not likely be sufficient to meet AFRH's immediate capital requirements. For these reasons, AFRH's need is best met by land development alternatives guided by a Master Plan. Therefore, this alternative was dismissed from further consideration.

Expand and improve the golf course to create a private city golf club

The creation of a private city golf club would not generate enough funds to support AFRH's mission. Therefore, this alternative was dismissed from further consideration.

Convert homes on General's Row into a bed and breakfast inn, a cocktail lounge, a commissary, shops, meeting rooms, a pharmacy, or outlet shops

Retail shops are being considered outside of the secured AFRH Zone as part of the Zone A redevelopment. However, a more robust land development strategy would be necessary to maximize revenue to support AFRH's mission while replenishing the Trust Fund. Therefore, this alternative was dismissed from further consideration.

Extend Soldiers' Home Cemetery

Extending the Soldiers’ Home Cemetery would not generate enough funds to provide sufficient revenue to support AFRH’s mission. Therefore, this alternative was dismissed from further consideration.

Environmentally Preferred Alternative

The CEQ Regulations § 1505.2 require AFRH to “identify all alternatives considered by the agency in reaching its decision, specifying the alternative or alternatives which were considered to be environmentally preferable.” The environmentally preferable alternative for this action varies depending on the resource area considered. Based on the impact analysis in the Final SEIS, Table 3 shows the environmentally preferable alternative(s) for each of the resources considered.

Table 3: Environmentally Preferable Alternative(s) by Resource Area

| Impact Topic | No Action Alternative | Master Plan Alternative |
|-------------------------------------|-----------------------|-------------------------|
| Stormwater Management | √ | |
| Greenhouse Gases and Climate Change | √ | |
| Air Quality | √ | |
| Land Use Planning and Zoning | √ | |
| Transportation | √ | |
| Environmental Contamination | | √ |

The No Action Alternative is the environmentally preferred alternative, but it is not the Selected Alternative because it does not meet the purpose and need for the AFRH Master Plan and its Amendments.

Environmental Consequences of the Selected Alternative

The environmental consequences of implementing the Selected Alternative are summarized below. All practicable means for avoiding or minimizing impacts have been incorporated into the Selected Alternative. The Master Plan will provide guidelines for all new development to ensure that impacts are avoided or minimized as planned.

Impacts on Stormwater Management

Implementation of the Master Plan will disturb soils from construction on the AFRH-W campus, which will result in temporary, adverse impacts to stormwater quality. The

permanent increase in impervious surface from the development of Zone A will result in long-term increases in stormwater runoff.

Impacts on Greenhouse Gases and Climate Change

Impacts from implementation of the Master Plan will result in emissions from construction vehicles that result in a temporary increase in greenhouse gases (GHG) being released into the atmosphere.

Emissions from mobile and stationary sources as a result of the implementation of the Master Plan will result in a long-term, minor increase in GHG emissions and contribute negligibly to climate change.

Indirect adverse impacts will result from an increase in energy use after the proposed development is complete.

The potential GHG emissions from implementation of the Master Plan will be a very small percentage of the District of Columbia's total GHG emissions. Therefore, GHG emissions from purchased electricity is expected to have an indirect, minor impact on GHG emissions and their associated contribution to climate change.

Impacts to Air Quality

Implementing the Master Plan will be in general conformance with the emission limits set forth under Clean Air Act (CAA) Section 176(C). There will be no exceedances of the carbon monoxide (CO) 1-hour and 8-hour National Ambient Air Quality Standards (NAAQS). There will be minor, long-term, adverse impacts from anticipated stationary sources. Emissions from construction equipment will vary over time, which will result in minor, short-term, adverse impacts.

Impacts on Land Use Planning and Zoning

Implementation of the Master Plan could serve as a catalyst for future development in the surrounding area which could result in changes in land use and zoning, particularly for Zone A.

Impacts on Transportation

Implementation of the Master Plan will cause additional growth in the area and will result in major, adverse impacts to traffic in the area.

There will also be major adverse impacts to transit systems as a result of increased ridership.

The existing internal bicycle and pedestrian network and the improvements to the external network will enhance bike and pedestrian access through the site and the region resulting in beneficial impacts.

Impacts on Environmental Contamination

The removal of hazardous waste and contaminants on the site will result in long-term beneficial impacts to human health and safety.

As noted above, the impacts to varying resource types were balanced against the project's purpose and need, and the mission of the Armed Forces Retirement Home. As noted previously, Alternative 2 was not selected as the preferred alternative as it did not meet the purpose and need. Alternative 3 was developed to meet the purpose and need and address potential impacts to cultural and environmental resources, while improving the financial viability of the Armed Forces Retirement Home and improving the available development in the area.

Public Involvement

In accordance with NEPA, a Notice of Intent (NOI) was issued in the Federal Register on April 2, 2015. The NOI announced AFRH's intent to prepare a SEIS to analyze the potential impacts resulting from proposed changes to the original master development plan.

Draft SEIS Public Comment Period and Public Hearing

The Draft SEIS on the AFRH Master Plan Update was issued on November 17, 2017. The public comment period extended from the date of issuance through January 12, 2018. A Public Hearing to present the findings of the Draft SEIS and solicit comments on the document was held on December 13, 2017. AFRH presented the Master Plan Alternative and provided members of the public, residents of AFRH, and representatives from special interest groups and government agencies the opportunity to provide comments on the Draft SEIS. Sixty-three people attended and 21 citizens spoke at the Public Hearing. The proceedings of the meeting, including oral comments, were recorded by a stenographer.

In addition, written comments were received from four Federal and local agencies, community organizations, and individual citizens.

Final SEIS, 30-Day Public Review

The Notice of Availability for the Final SEIS for this proposed action was published in the Federal Register on March 25, 2022, opening a 30-day public review period ending April 25, 2022. Copies of the Final SEIS were sent to 152 agencies, organizations, and individuals. The Final SEIS was also made available on AFRH's website.

AFRH received comments on the Final EIS from two Federal agencies and two local governmental organizations. The comments focused on administrative corrections, endangered species, and transportation impacts. All comments were considered in deciding on the Selected Alternative.

Consultation with Federal, State, and local agencies has been conducted throughout the preparation of this EIS. NCPC and AFRH coordinated with the following agencies:

- National Park Service (NPS)
- U.S. Commission of Fine Arts (CFA)
- Advisory Council on Historic Preservation (ACHP)
- U.S. General Services Administration (GSA)
- District of Columbia State Historic Preservation Office
- District Office of Planning
- District Department of Transportation,
- Advisory Neighborhood Commissions

Section 106 of the National Historic Preservation Act

The development of the site could potentially result in adverse effects to the historic character of the site. AFRH has executed a programmatic agreement with the National Capital Planning Commission (NCPC), DC State Historic Preservation Office (DCSHPO), Advisory Council on Historic Preservation (ACHP), and the U.S. National Park Service that enumerates the measures which will be undertaken to avoid, minimize, or mitigate potential adverse effects. Consulting parties to the Section 106 process of the NHPA helped to identify potential adverse effects and advise on avoiding or mitigating such effects. Consulting parties include: ACHP; DCSHPO; the National Park Service; the National Trust for Historic Preservation; the NCPC; the District of Columbia Office of Planning (DCOP); the U.S. Commission of Fine Arts; the Committee of 100 on the Federal City; the District of Columbia Preservation League; Advisory Neighborhood Commissions (ANC) 1A, 4C, 5A, and 5E; the Rock Creek Cemetery Association; President Lincoln's Cottage; St. Paul's Episcopal Church; the Military Officers Association of America; Friends of the Soldiers' Home; ; the US Army (via Arlington National Cemetery); CUA; and Council Members for Wards 1, 4 and 5.

Mitigations Measures

Potential mitigation measures were identified and recommended in the Final SEIS to address the variety of short-term and long-term impacts resulting from the Selected Alternative. With respect to the Selected Alternative, Table 7 details the mitigation commitments that AFRH (for the AFRH Zone) and/or the developer of Zone A will implement. AFRH will provide a periodic report to NCPC on the status of mitigation measures enumerated in this ROD. The report will be provided to NCPC on a biennial basis starting two (2) years after approval of the AFRH Master Plan update.

Table 7: Mitigation Measures to be Undertaken

| Impact Topic | AFRH | Zone A Developer |
|---------------------------------------|---|------------------|
| Geology, Topography, and Soils | Soil suitability will be determined, and appropriate building foundation specifications will be developed. | |
| Biological Resources | <p>Mitigation measures for effects to vegetation and wildlife primarily consist of maintaining large green space to provide for wildlife habitat and movement corridors. Landscape and vegetation will be retained in compliance with the approved Master Plan.</p> <p>Revegetation of removed or damaged vegetation, as a result of construction activities, will be undertaken to the extent possible to mitigate impacts to terrestrial biota. Careful siting of new buildings within zones will help mitigate potentially adverse impacts.</p> | |
| Water Resources | <p>Low-impact development techniques will be implemented, such as bioretention areas, street trees, green roofs on new buildings, rain barrels or cisterns, and pervious sidewalk materials.</p> <p>Large-scale development will be concentrated in Zone A of the AFRH-W campus to preserve and protect 174 acres of existing open space in the AFRH Zone, including the golf course, building quadrangles, woodlands, forests, and other open areas.</p> <p>The vegetative buffer along the perimeter wall of the AFRH Zone will be preserved and enhanced with additional plantings, which will reduce stormwater runoff in these areas. Impacted trees or tree stands will be replaced in form and function to the maximum extent practicable.</p> <p>A Stormwater Management Plan (SWMP) and a Soil Erosion and Sediment Control Plan will be prepared for both zones in accordance with the amended 21 DCMR 5 and the 2020 Stormwater Management Guidebook (SWMG). All construction activities including clearing, grading, site stabilization, the preservation or creation of pervious land cover, the construction of drainage conveyance systems, the construction of BMPs, and all other stormwater and sediment related components of the project will be conducted in accordance with the SWMP.</p> | |

| Impact Topic | AFRH | Zone A Developer |
|---|---|---|
| | <p>Best Management Practices (BMPs) will be utilized to mitigate indirect and cumulative impacts to wetlands associated with the proposed action. Development in wetland areas is regulated by the USACE pursuant to the Clean Water Act. In the District of Columbia, development in wetlands or streams requires a permit from the USACE, Baltimore District issued pursuant to Section 404 (b) (1) guidelines of the Clean Water Act.</p> | |
| <p>Greenhouse Gases and Climate Change</p> | <p>None</p> | <p>Implementation of an idling reduction program to reduce emissions associated with unnecessary vehicle idling. Implementation of preventative maintenance schedules for construction equipment, to improve the operational efficiency and reduce GHG emissions. Energy conservation measures and/or renewable energy sources could be incorporated into building design to mitigate impacts related to emissions from energy use.</p> <p>Incorporate climate adaptation techniques/systems into the new development. Improved building design, operations, increased green space (such as rooftop gardens or landscaping), and water management can reduce energy use in buildings and can protect them from severe precipitation, flooding and increases in temperature (CCAP 2014).</p> |
| <p>Air Quality</p> | <p>Best Management Practices outlined in the District’s regulations during construction will be implemented to ensure there will be minimal temporary construction-related adverse impacts. Developers and construction contractors will be required to submit a construction management plan including plans to control impacts to air quality during construction.</p> | |
| <p>Noise</p> | <p>The following mitigation measures will be developed and enforced through transaction documents between AFRH and developers/construction contractors through a construction management plan:</p> <ul style="list-style-type: none"> • All construction equipment powered by an internal combustion engine will be equipped with a properly maintained muffler; • Air compressors will meet current U.S. EPA noise emission standards; | |

| Impact Topic | AFRH | Zone A Developer |
|-----------------------|--|---|
| | <ul style="list-style-type: none"> • New construction equipment will be used as much as possible since it is generally quieter than older equipment; • Nighttime construction activities will be minimized; • Portable noise barriers within the equipment area and around stationary noise sources will be established; and • Tools and equipment will be selected to minimize noise. | |
| Utilities | <p>Impacts to utilities will be minimized through the following:</p> <ul style="list-style-type: none"> • Preparation of a water conservation plan and policy; • Installation of faucet aerators and low-flow toilets and shower heads in new construction; • Design of landscape plans for minimum water use (e.g., plant native, drought-tolerant species); • Minimization of lawns because of their high-water consumption (and energy consumption and air emissions from mowers); • When necessary, water conservation in lawn maintenance (set mower blades high and water slowly at night no more than 1 inch per week with automatic, low-volume irrigation equipment); • Incorporation of energy conservation measures into new building design to mitigate impacts related to power systems; • Recycling of construction related debris; • Implementation of office recycling programs in government spaces in accordance with Executive Order 13423, <i>Strengthening Federal Environmental, Energy, and Transportation Management</i>; and • Implementation of office recycling programs in private office and retail spaces in accordance with DC Solid Waste Management and Multi-Material Recycling Act of 1988 (DC Law 7-266). | |
| Transportation | <p>AFRH will require developers to prepare a transportation management plan detailing strategies to reduce single occupancy vehicle use.</p> | <p>Traffic Mitigation <u>Irving Street NW and First Street NW</u></p> <ul style="list-style-type: none"> • Extension of First Street NW northward from the Irving Street NW and First Street NW intersection to serve as the gateway access for the site with inbound and outbound access available between Parcel C and Parcel D. |

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| | | <ul style="list-style-type: none"> • Addition of a northbound-thru lane along First Street NW into the site. • Addition of an eastbound left-turn lane along Irving Street NW into the site. • Signal modification to accommodate site access. • The intersection improvements will be constructed to current DDOT standards. <p><u>Other Intersection Improvements</u> The developer will contribute funding to DDOT for the construction of improvements at the intersections of North Capitol Street and Allison Street NE/Hawaii Avenue NE, and North Capitol Street and Rock Creek Church Road NW/Buchanan Street NE. The improvements the developer will contribute funding toward include the following:</p> <p><u>North Capitol Street and Allison Street NE/Hawaii Avenue NE</u></p> <ul style="list-style-type: none"> • Curb extensions w/ flex posts and white and tan pavement markings at the western and eastern corners of North Capitol Street and Allison Street NW/NE. • Curb extensions to provide 10-foot clearance between crosswalks and parking zones on Allison Street. <p><u>North Capitol Street and Rock Creek Church Road NW/Buchanan Street NE:</u></p> |

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| | | <ul style="list-style-type: none"> • Stripe extension of existing painted curb lane buffer to north of Buchanan Street. • Upgrade crosswalk across North Capitol Street to a high visibility crosswalk. <p>In addition to physical roadway improvements, transportation demand management (TDM) measures will be implemented onsite to reduce single-occupancy vehicle trips. The site developer will work with DDOT to establish a plan that outlines measures that will be applied onsite. These measures will be applied as appropriate for each development phase.</p> <p><u>Additional Access Points</u> Upon completion of the urbanization of the cloverleaf and North Capitol Street corridor by DDOT, the developer will provide the following additional access points to the site:</p> <ul style="list-style-type: none"> • One additional connection to North Capitol Street, north of the Heating Plant (Building 46). • One additional connection to North Capitol Street between Parcel F and Parcel P, consistent with the connection shown in the 2021 DDOT North Capitol Cloverleaf Urbanization Study. • One additional connection to Irving Street NW between Parcels E and F, consistent with the connection shown in the 2021 DDOT North Capitol Cloverleaf Urbanization Study. <p><u>Transit Coordination</u></p> |

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| | | <p>Continue coordination with WMATA and DDOT regarding future transit services, as well as bringing existing and future transit services onto the AFRH-W site.</p> <p>The developer will construct an 800 SF on-site kiosk facility with restrooms and an indoor seating area that will be publicly accessible, as well as three (3) curbside bus parking spaces. The transit center will be located along the Zone A spine road (First Street, Pershing Drive, Eisenhower Drive, or Scale Gate Road).</p> <p>The developer will design and construct the facility based on WMATA design requirements. The developer will work with DDOT and WMATA to locate the facility in the optimal location along the spine road. The permanent location will be constructed at the time that vertical parcel is built. If the parcel selected will not be built out until after Phase 2, the developer will work with DDOT and WMATA to locate a temporary 800SF location with similar amenities that will function until the permanent location is built. At least one (1) Capital Bikeshare station and micromobility parking/ charging station described in the Pedestrian Facilities section below will be located near the Transit Center. Electrified shelters will also be included at the main Transit Center and the other bus stops, subject to WMATA and DDOT approval.</p> <p>The Transit Center and bus stops will be designed in coordination with DDOT so that they do not compete with loading zones, pick-up/drop-off zones, or bike lanes.</p> |

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| | | <p>Pedestrian Facilities</p> <p>Bikeshare and micromobility parking as follows:</p> <ul style="list-style-type: none"> • Phase 1: One 19-dock Capital Bikeshare station on-site. • Phase 2: One 8-bay micromobility parking and charging station. • Phase 3: One 19-dock Capital Bikeshare station on-site, and one 8-bay micromobility parking and charging station. • Phase 4: One 19-dock Capital Bikeshare station on-site, and one 19-dock Capital Bikeshare station off-site. <p>These measures are to be installed in conjunction with the bulk of the construction associated with the respective Phases.</p> <p><u>External Improvements</u></p> <p><u>Irving Street</u></p> <p>The AFRH-W Zone A developer will design and construct a 10-foot path with 6-foot tree boxes between Park Place NW and the southeastern corner of Parcel E along Irving Street NW. The developer will be responsible for design, permitting, and execution of this work with the completion of Parcel C, D, or E whichever occurs first.</p> <p>A pedestrian path along the east side of Parcel E between the Zone A spine road and Irving Street NW will also be</p> |

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| | | <p>designed and built by the Parcel E Vertical Developer during the construction of Parcel E.</p> <p><u>N. Capitol Street</u> The AFRH-W Zone A developer will design and construct a 10-foot path with 6-foot tree boxes between Scale Gate Road and the southeastern corner of Parcel N / northeastern corner of Parcel P along North Capitol Street. The developer will be responsible for design, permitting, and execution of this work with the completion of Parcel P.</p> <p>If DDOT determines it is necessary, the developer, subject to the provisions of the ground lease with AFRH, will provide a public access easement for public access along the side path along the east side of Parcel N. Such easement shall be directly adjacent to the right-of-way and will not extend further than 16 feet from the existing curb of North Capitol* Street.</p> <p>A pedestrian path between Parcel N and Parcel P connecting the Zone A spine road and the North Capitol Street sidewalk will also be designed and built by either the Parcel N or Parcel P Vertical Developer, whichever Parcel is built first. If stairs are necessary to access the sidewalk, it will include a runnel for bicycles.</p> |
| Environmental Contamination | | <p>Should the selected developer opt to remove the asphalt roadway and tar base layer located adjacent to the western side of the Heating Plant (Building 46), this material will be taken off-site to an asphalt recycling facility.</p> |

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| | | <p>The existing groundwater monitoring wells at the site should be abandoned by a licensed driller following DOEE notification and District of Columbia Department of Consumer and Regulatory Affairs (DCRA) permitting. These wells include the five wells installed by ABB Environmental Services, Inc. in 1990 (four of which have been found), the six wells installed by MACTEC in 2006 (most notably dry well W46-1), and the three wells installed by CGS. If the need for any of the wells installed by ABB Environmental Services, Inc. in 1990 continues, it is recommended that new surface covers be installed at these locations.</p> <p>If the out of service underground storage tanks (USTs) at Building 46 are not abandoned in place as expected, soils excavated for the UST removal will need to be transported for off-site disposal.</p> <p>Should the potential need for vapor intrusion mitigation exist, based on the re-development plans for Building 46 (i.e., the first floor of Building 46 will be utilized as occupied space), it is recommended that, in addition to installation and sampling of new Vapor Monitoring Ports (VMPs) consistent with DOEE's requirement to delineate the extent of impact, existing VMPs (minimally VMP-01 and VMP-06) be re-sampled along with indoor air sampling to confirm the results of CGS' single sampling event before pilot testing/design of a vapor intrusion mitigation system is initiated. If additional VMPs are to be installed, a Work Plan will be developed for DOEE</p> |

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| | | <p>review. DOEE should be consulted to determine whether a DCRA permit will need to be obtained for the mitigation system.</p> <p>In the event that the re-development plans for Building 46 do not include use of the first floor of Building 46 as occupied space or that the results of expanded sampling/re-sampling do not confirm the prior results, conversations will be held with DOEE to discuss its requirements for a mitigation system. Any VMPs, that will no longer be needed, and as approved by DOEE, be abandoned.</p> <p>Additional horizontal delineation of the total petroleum hydrocarbons – diesel range organics (TPH-DRO) contamination in soil should be conducted. In addition to fulfilling DOEE’s requirement, this information will be needed if any subsurface excavation is planned in this area (for building footers, etc.) to determine the volume of soil that will require off-site disposal. If a subsurface structure is planned for this area (i.e., sub-grade parking garage or basement), and pending DOEE approval, this information could be obtained while excavation for the structure is being performed. Otherwise, this information should be obtained via soil borings. If this information is to be obtained via soil borings, a Work Plan will be developed for DOEE review, and a DCRA permit should be obtained.</p> <p>Depending on the re-development plans for Building 76 (Garage) and whether soil (that may present a potential vapor intrusion concern) is removed, any planned new</p> |

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| | | <p>residential building(s) in this area may need to be constructed with a vapor barrier to mitigate vapor intrusion.</p> <p>Once DOEE's requirements for this area have been met, a request for closure of LUSTCASE # 2018011 will need to be submitted to DOEE.</p> <p>Removal of both USTs will be verified by excavation, geophysical methods and/or further records review. After verification of UST removal, a limited contamination assessment will be conducted in the areas of the former USTs to include collection of soil and groundwater samples for analysis of TPH-DRO.</p> <p>Once the redevelopment plans for this area have been determined, the procedure to permanently close the USTs will be initiated. The closure process includes DOEE notification, DCRA permitting, removal or abandonment by a licensed UST contractor, and follow-up reporting. If the USTs are removed, it is recommended that the soil at SB-10 (7') also be excavated for off-site disposal. Once the UST abandonments (or removals) have been completed, a request for closure of LUSTCASE # 2018010 will need to be submitted to DOEE.</p> <p>All hazardous materials including asbestos-containing materials (ACM) and lead-based paint (LBP) will be properly assessed and remediated prior to demolition of buildings or building renovations.</p> |

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| Archeological Resources | <p>Specific Phase 1 archaeological assessments and surveys, as required by the Guidelines for Archaeological Investigations in the District of Columbia and recommended by the AFRH-W Phase 1A archaeological study prepared by Stantec in 2014, will be conducted in defined areas of Limits of Disturbance (LODs) associated with the development locations shown in the Master Plan prior to undertaking related ground disturbance. The assessments and surveys will cover the LODs for all infrastructure, utilities, buildings, and structures. These investigations should be conducted well in advance of the ground disturbance to avoid conflict with development schedules.</p> | |
| Historic Properties | <ol style="list-style-type: none"> 1) AFRH will retain the services of a Cultural Resources Manager (CR Manager) to assist AFRH in the implementation of the 2007 Historic Preservation Plan (HPP). The CR Manager will be retained within twelve (12) months of NCPC's approval of the AFRH-W MP. (Completed 2008 and ongoing) 2) AFRH will plant additional trees to replace those required for the relocation of two golf holes due to the Zone A development. Trees will be replaced on a 1-to-1 basis in accordance with AFRH Treatment Recommendations for Landscape Resources in Chapter 6 of the 2007 HPP at the time the golf holes are relocated. 3) AFRH will develop and implement a Historic Preservation Maintenance Program (HPMP) designed to identify and prioritize the maintenance needs of the contributing historic (built, natural and designed landscape, and | <ol style="list-style-type: none"> 1) Developer will rehabilitate and adaptively use, in conformance with the Secretary of Interior's Standards for Rehabilitation (36 C.F.R. 67) and its associated Guidelines the following buildings in Zone A: <ul style="list-style-type: none"> • Barnes Building (Building 52) • Forwood Building (Building 55) • King Hall (Building 59) • Viewing Stand (Building 50) • Bandstand (Building 49) • Mess Hall (Building 57) • Mess Hall Corridor (Building 58) • Hostess House (Building 53) • Quarters 47 (Building 47) • Heating Plant and Storage Contamination Building (Building 46 and 69) <p>Developer will develop a stabilization and maintenance plan for the buildings and structures listed above no later than 120 days after the effective date of the Master Lease for Zone A detailing the steps to be taken to stabilize and maintain the buildings prior to formal rehabilitation.</p> |

| Impact Topic | AFRH | Zone A Developer |
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| | <p>archeological) resources. This plan will be developed and implemented within two (2) years of NCPC’s approval of the AFRH-W MP. Copies will be provided to Parties and Consulting parties upon written request after its completion. (Completed 2011)</p> <p>4) AFRH will integrate the AFRH-W Resource Inventory/Cultural Resource Management Database into the Home’s proposed Computerized Maintenance Management System (CMMS) at the time the new CMMS is brought online. It is anticipated that this system will be brought on line within 2 years of NCPC’s approval of the AFRH-W MP. (Completed 2009)</p> <p>5) AFRH will complete an update to an August 2007 tree survey to include Zones B and C within one (1) year of commencement of rent payments from the Zone A development (Rent payments will commence with the issuance of the first Certificate of Occupancy for Zone A). Copies will be provided to Parties and Consulting Parties upon written request after its completion.</p> <p>6) AFRH will develop a landscape master plan for the AFRH Zone and Zones B and C of the campus. This plan would be developed within</p> | <p>Rehabilitation for these buildings and structures listed above will commence in accordance with the Project Schedule submitted as part of the Project Plan for the first non-infrastructure phase of development.</p> <p>2) Developer will rehabilitate historic landscape resources in Zone A including:</p> <ul style="list-style-type: none"> • Forwood Building Grounds; • Pershing Drive Street Trees, south and east: Developer will preserve the historic orientation of Pershing Drive and shall preserve, to the maximum extent possible, the alley of trees bordering Pershing Drive. If not possible to save all the trees, the Developer will replant trees of the same species with the intent of restoring the historic alley; • Hospital Complex Quadrangle; • Specimen Trees in Hospital Lawn. If it is not possible to save all trees, the Developer will replant trees of the same species in an AFRH agreed upon location within the Hospital lawn.; and • Pasture Recreation: Developer will preserve to the maximum extent possible the orientation, unaltered topography, and configuration of the Historic Pasture in Zone A. Also, historic trees in the northwest section of the Historic Pasture shall be preserved to the maximum extent possible. If it is not possible to save all trees, the Developer will replant trees of the same species in an AFRH agreed upon location within the historic pasture. |

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| | <p>one (1) year of the commencement of rent payments from Zone A, and will be based on the AFRH-W MP, HPP, and the updated tree survey identified in #5 above. Implementation of the landscape master plan will begin within one (1) year of completion of the Landscape Master Plan. This document will be distributed to the Parties and Consulting Parties as defined in the AFRH Programmatic Agreement for review and comment during its development.*</p> <p>7) AFRH will complete specific landscape projects as follows:</p> <ul style="list-style-type: none"> a. The Scott/Sheridan Promenade Project will be completed within three (3) years of NCPC’s approval of the AFRH-W MP. (Completed 2008) b. The Scott Building Tree Planting Program will be completed as part of the landscape master plan developed in item #5 above. <p>8) AFRH will perform a condition assessment of the historic fence along the western perimeter of the site, and will stabilize the fence, which work will be followed by regular, periodic maintenance to prevent further deterioration of the fence. The assessment will be conducted</p> | <p>3) The Developer will devise and implement an educational interpretation program, including signage focusing on the history of AFRH and AFRH-W.</p> <p>4) The Developer will complete a tree-planting program and the maintenance of historic trees in accordance with the approved AFRH Master Plan and Historic Preservation Plan over the course of the Zone A development.</p> <p>5) The Developer will comply with height limits and screening guidance in the Master Plan to protect viewsheds as identified in the HPP and AFRH-W Master Plan, as approved by NCPC.</p> |

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| | <p>within two (2) years of NCPC’s approval of the AFRH-W MP. (Completed 2010)</p> <p>9. AFRH will comply with height limits and screening guidance in the Master Plan to protect viewsheds as identified in the HPP and AFRH-W MP, as approved by NCPC.</p> | |

*Zones B and C are no longer identified development areas in the AFRH Master Plan. They have been incorporated into the AFRH Zone. Mitigation for these items will occur in the areas of the AFRH Zone previously identified as Zones B and C.

Unavoidable Adverse Impacts

Unavoidable adverse impacts of the proposed action will include short-term temporary impacts, such as noise, air emissions, and occasional traffic congestion associated with construction activities. Unavoidable, long-term adverse effects will include construction of new buildings within open space/meadows on AFRH-W; removal of mature trees; changes in viewsheds for residential areas outside of AFRH-W; permanent changes in the historic cultural landscape; changes in viewsheds to National Register of Historic Places (NHRP)-listed and eligible properties; and an increase in traffic and associated noise on local roads. In all cases, mitigation measures have been developed to minimize these impacts, and the impacts will be addressed in compliance with District and Federal regulations.

Conclusion

Based on the analysis and evaluation contained in the Final SEIS, and after careful consideration of all the identified social, economic, and environmental factors; input received from other agencies, organizations, and the public; and the mitigation measures outlined above, it is the decision of AFRH to select Alternative 3: Master Plan Amendment 2 to sustain AFRH-W and its primary source of funding, the AFRH Trust Fund. The key factors considered in this selection include:

- The Selected Alternative best meets the project's purpose and need.
- The Selected Alternative would best improve the resident experience, while balancing new development potential with impacts to historic properties and other resources.
- The Selected Alternative restores several historic buildings, maintains the character of the campus and maintains the significant viewsheds.
- Individual projects implemented pursuant to the Selected Alternative will be subject to further evaluation and consultation under the Programmatic Agreement adopted pursuant to Section 106 of the NHPA. Individual projects will seek to further avoid, minimize and mitigate adverse effects to historic properties.

Based upon the above considerations, NCPC approves the Selected Alternative as the basis for the Armed Forces Retirement Master Plan.

Elizabeth A. White
Chair
National Capital Planning Commission

Date