Executive Director's Recommendation
Commission Meeting: March 1, 2018

PROJECT
Armed Forces Retirement Home Master Plan Amendment 1
140 Rock Creek Church Road, NW
Washington, DC

SUBMITTED BY
Armed Forces Retirement Home

REVIEW AUTHORITY
Approval of Master Plans for use by the Commission per 40 U.S.C. § 8722(a) and (b)(1)

APPLICANT'S REQUEST
Approval of final master plan

PROPOSED ACTION
Approve final master plan as requested

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY
The Armed Forces Retirement Home (AFRH) in Washington, DC has submitted for Commission review and approval an amendment to its campus master plan, which was approved by the Commission in July 2008. AFRH maintains a 272-acre campus with more than 100 buildings and ancillary structures, which provide residences and related services for approximately 600 eligible retired and former members of the Armed Forces. On-site amenities include health services, a bank, chapels, a convenience store, a post office, a barber shop and beauty salon, and a range of recreational facilities including a nine-hole golf course and walking trails. AFRH is a non-appropriated independent federal agency, and as such, is hoping to use the master plan to leverage unused portions of its campus to sustain funding through a long-term lease with a private developer. The original master plan and current amendment will provide a basis for facilitating and directing this future development.

The master plan divides the campus into two primary zones: 1) the AFRH Zone, which houses the main AFRH campus and will be retained for federal use (192 acres), and 2) Zone A, which will be leased for private mixed-use development, including residential, office, research and development, institutional, medical, retail, and hotel uses (80 acres). Detailed guidance in the master plan outlines allowable land uses, building massing, street layouts, and parking supplies for this zone, which, per a memorandum of understanding (MOU) among NCPC, AFRH, and the District of Columbia (DC) Office of Planning, would be used as a small area plan by the DC Office of Planning to recommend zoning for DC Zoning Commission consideration and adoption. The MOU stipulated that this area of the campus would then be subject to DC local land development controls moving forward.

This master plan amendment proposes a minor modification to the boundary of Zone A to include a heating plant and associated outbuildings (referred to as Parcel U), which were decommissioned by AFRH in 2013 when the campus developed more energy-efficient systems. Three buildings
comprise Parcel U, two of which contribute to the AFRH Historic District, and one of which is a non-contributing structure. As described in the National Historic Preservation Act programmatic agreement developed for the site, the two contributing buildings will be adaptively reused in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. The non-contributing structure may be demolished. The subject amendment also includes a modification to the proposed fence line between the AFRH Zone and Zone A, a small portion of which would skirt the AFRH Main Substation (Building 71) retained for AFRH use. Because this portion of fencing would cross federal land retained for federal use, it will be subject to final review and approval by the Commission. The majority of the fence, however, would be subject to local development controls as outlined in the MOU.

KEY INFORMATION

- AFRH maintains a 272-acre campus with more than 100 buildings and ancillary structures, which provide residences and related services for approximately 600 eligible retired and former members of the Armed Forces.
- As a non-appropriated independent federal agency, AFRH is hoping to use the master plan to leverage unused portions of its campus to pursue a long-term lease with a private developer.
- The master plan divides the campus into two areas: 1) AFRH Zone, which will be retained for federal use, and 2) Zone A, which would be leased to a private entity for the creation of a mixed-use development to provide an income stream for AFRH.
- As described in the master plan, Zone A will be developed as a semi-urban neighborhood, including a new street grid with a range of street typologies, and multiple major mixed-use developments.
- AFRH is proposing the current master plan amendment to modify the development zone to include Parcel U.
- Parcel U contains three buildings that have been decommissioned—two of which are contributing to the AFRH Historic District and will be rehabilitated, and one of which is not historic and may be demolished.
- The parcel is designated as a commercial use with assumed retail, and will generally maintain the existing street character.
- AFRH conducted an environmental impact statement (EIS) for the master plan when it was completed in 2008. Since 10 years have elapsed, AFRH is developing a supplemental EIS to reflect current law and policy and update the transportation analysis in light of recent development in the surrounding area.
- AFRH is planning to select a developer for Zone A through the request for proposals (RFP) process that will begin in the spring.
- The DC Office of Planning provided comments on the supplemental EIS, indicating that the master plan is not responsive to new opportunities and challenges for the AFRH site, given the changing urban context and the impacts on public facilities and infrastructure, and would like the site plan for Zone A to be substantially updated. To help address the new opportunities and challenges, AFRH has given the DC Office of Planning the opportunity to provide comments that will inform the request for proposals process.
• The DC Office of Planning has also indicated they would be willing to participate in a review of proposals if AFRH requests such assistance.
• The District Department of Transportation (DDOT) also provided comments on the SEIS, questioning the appropriateness of mitigation measures proposed to address anticipated traffic impacts. Since that time, AFRH has clarified that it plans to update the mitigation measures in the SEIS based on the specifics of the selected developer’s proposal, which will be reflected in an updated record of decision (ROD).
• Once selected, the development team could adopt the plan as approved by the Commission, or could seek to modify the master plan. Any proposal to modify the approved master plan, including, but not limited to, design parameters, street configuration, or parking, would require AFRH to submit a master plan amendment for NCPC review and approval.
• AFRH intends to update the mitigation measures in the SEIS based on the specifics of the selected developer’s proposal, and to issue an updated record of decision (ROD) identifying the specific mitigation measures that will be implemented. These updated mitigation measures will be coordinated with relevant District agencies, and implementation of the measures identified in the updated ROD will be a contractual requirement of the developer as part of the ground lease with AFRH.

RECOMMENDATION

Approves the Armed Forces Retirement Home (AFRH) Master Plan Amendment 1, which moves the heating plant and associated outbuildings (known as Parcel U) from the AFRH Zone to Zone A for private development, and modifies the fence line between these zones to accommodate this change.

Notes that Parcel U contains two structures that contribute to the AFRH Historic District, and one non-contributing structure. The two historic structures will be rehabilitated in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and associated guidelines, and the non-contributing structure may be demolished, as stipulated in the AFRH Master Plan approved by the Commission in July 2008 and its associated programmatic agreement, as amended.

Notes that properties in Zone A, including Parcel U, will be zoned by the Zoning Commission of the District of Columbia (DC) in accordance with the approved master plan, and subject to the land use controls of the DC Office of Planning, per the arrangement outlined in a Memorandum of Understanding among the National Capital Planning Commission, DC Office of Planning, and AFRH.

Notes that the DC Office of Planning and the DC Department of Transportation provided comments on the recent supplemental environmental impact statement for the master plan (unrelated to the proposal for Parcel U), indicating the master plan is not responsive to new opportunities and challenges given the changing urban context.
Encourages AFRH, NCPC, and the District to work together to address how the request for proposals process, the master plan, and/or mitigation measures can respond to new opportunities and challenges associated with a changing urban context.

Notes that any proposal to update/modify the approved master plan, including changes proposed by the selected developer, would require AFRH to submit a master plan amendment for NCPC review and approval. Amendments that result in changes to anticipated traffic levels or approved parking would require an updated transportation management plan.

Requires that, pursuant to the National Capital Planning Act, AFRH submits for NCPC review and approval project plans for any development proposed in the AFRH Zone, including the portion of fencing adjacent to the AFRH Main Substation (Building 71) retained for AFRH use.

PROJECT REVIEW TIMELINE

| Previous actions | July 2008 – Commission reviewed and approved final master plan.  
|                 | February 2007 – Commission provided comments on draft master plan.  
| Remaining actions (anticipated) | – Review and approval of federal projects that result from the master plan, including a portion of fence that traverses federal land retained for use by AFRH.  

PROJECT ANALYSIS

Executive Summary

Staff has reviewed the submitted master plan amendment, and finds that the proposal to move the heating plant and associated outbuildings into Zone A would effectively meet the needs of AFRH, while aligning with the larger goals, objectives, and development guidelines that were approved by the Commission in the original master plan. The changes to the master plan are relatively minimal, and would ensure that the historic structures are appropriately rehabilitated and adequately maintained into the future. Accordingly, NCPC staff recommends that the Commission approve the Armed Forces Retirement Home Master Plan Amendment 1, which moves the heating plant and associated outbuildings from the AFRH Zone to Zone A for private development, and modifies the fence line between these zones to accommodate this change.
Analysis

Master Plan Background

As noted, the Commission initially reviewed and approved the final master plan for AFRH in July of 2008, which ultimately divided the campus into two main areas: 1) The AFRH Zone, which would be retained for AFRH operations, and 2) Zone A, which would be leased to a private entity for the creation of a mixed-use development to provide an income stream for AFRH. While several new projects were proposed for the AFRH Zone (totaling 398,000 square feet), the master plan provided a comprehensive new vision for Zone A. Development in Zone A is intended to create a sustainable, walkable community, which includes the introduction of a new street grid with a range of street typologies, and the construction of multiple major mixed-use developments, including uses such as research and development, office, residential, hotel, and retail (totaling 4,366,995 square feet). The master plan also provided detailed design guidelines to help ensure a semi-urban character and to protect major viewsheds. A transportation management plan was also approved for the site, which allotted 5,155 parking spaces for development proposed in Zone A, as well as guidelines to manage any increases or decreases in parking.

To guide development of Zone A, a memorandum of understanding (MOU) was developed among NCPC, AFRH, and the DC Office of Planning, which dictated that the master plan would be used as a small area plan by the DC Office of Planning to recommend zoning of the property for DC Zoning Commission consideration and adoption. All NCPC-approved design guidelines would be stipulated in the final zoning, and any variation in elements including, but not limited to, design parameters, street configuration, or parking proposed for Zone A would require AFRH to submit a master plan amendment for NCPC review and approval. Further, any changes that would result in changes to anticipated traffic levels or approved parking would require an updated transportation management plan. As the property owner, it is at the discretion of AFRH to amend the master plan.

Prior to submitting the original master plan in 2008, AFRH had selected a developer for Zone A; however, this selection coincided with an economic downturn, and the development was eventually determined financially infeasible and the developer abandoned its plans. Implementation of the plan for Zone A has consequently been on hold for many years, though AFRH is currently working to move the process forward, and plans to issue a request for proposals (RFP) for Zone A this spring. The selected developer can either propose development that follows the amended master plan, as approved by the Commission, or could propose a new amendment, which AFRH would submit for Commission review and approval.

Current Amendment

Before a new developer is selected, AFRH is proposing the current master plan amendment to modify the development zone to include a heating plant and associated outbuildings (Parcel U), which were decommissioned by AFRH in 2013 and currently sit vacant. The inclusion of the Heating Plant Parcel in Zone A represents a negligible change overall to planned new development (see Table 1). The amendment also includes a minor adjustment to the fence line between the AFRH Zone and Zone A to accommodate this change. Because AFRH must maintain the use of
its Main Substation (Building 71), which sits just south of the heating plant, the fence will necessarily cross AFRH-retained land in this area (see Access and Security Plan in attachment). This portion of fence will require further review by the Commission, as will any other projects proposed for the AFRH Zone. Accordingly, staff recommends that the Commission require that, pursuant to the National Capital Planning Act, AFRH submits for NCPC review and approval project plans for any development proposed in the AFRH Zone, including the portion of fencing adjacent to the AFRH Main Substation (Building 71) retained for AFRH use. The inclusion of the Heating Plant Parcel in Zone A represents a negligible change overall to planned new development (see Table 1).

<table>
<thead>
<tr>
<th>Development Zone and Proposed Use</th>
<th>2008 Master Plan</th>
<th>Current Master Plan Amendment</th>
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</thead>
<tbody>
<tr>
<td>AFRH Zone</td>
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<td>Heating Plant Parcel</td>
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<td></td>
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</table>

Table 1. Planned New Development (in gross square feet)

Historic Preservation

Parcel U contains three buildings that will be moved from the AFRH Zone to Zone A for private development. Two of these buildings contribute to the AFRH Historic District, which comprises the entire campus and was designated in the National Register of Historic Places in 2007. These buildings include the Heating Plant (Building 46) and the Storage Contamination Building (Building 69). As described in the master plan, these buildings will be adaptively reused in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and other standards and guidelines outlined in the programmatic agreement (PA) and the AFRH Historic Preservation Plan. The Support Directorate Building (Building 70) does not contribute to the AFRH Historic District. The developer may choose to retain and reuse this building, but the guidelines presented in the master plan also allow for the demolition of non-contributing buildings. If the building were to be demolished, it could be reconstructed on the same footprint to the height, bulk, and massing of the original building.

Land Use and Transportation

As with other portions of Zone A, the master plan amendment designates potential uses for the buildings that will be retained, as well as proposed street types for the adjacent street network. The plan states that Parcel U will have a proposed use of commercial with
assumed retail. The street types proposed for the area are intended to generally match the character of existing streets, though lighting, bicycle lanes, and sidewalk shared bike lanes may be added to the portion of road that provides primary access to the site. No parking is proposed for Parcel U, though existing paved areas that contain very limited parking (approximately 10 spaces) may be retained. The majority of parking for Zone A, which will serve uses in Parcel U, was developed by the original developer in coordination with the District Department of Transportation (DDOT), and may be modified by a future developer. The amendment indicates that the redevelopment of the surrounding landscape will be consistent with previously approved guidelines for Zone A.

**Environmental Analysis and Interagency Coordination**

To ensure the longevity of its master plan, AFRH had initially proposed leasing not only Zone A, but also considered the lease of small portions of the southwest and west areas of the campus if needed in the future—Zones B and C respectively. Zone B was proposed to contain office, residential, and institutional uses, while Zone C was intended to include residential. The EIS for the master plan analyzed all four zones (AFRH, A, B, and C). In discussions with the Commission, it was determined that the master plan need not include such long-term plans, and the Commission approved the development proposed for Zone A only, and returned Zones B and C to the AFRH Zone. AFRH revised and resubmitted its master plan to reflect this approval, which the Commission accepted as a final master plan without further review.

AFRH is currently finalizing a supplemental environmental impact statement (SEIS) that will incorporate the return of Zones B and C to the AFRH Zone, analyze the proposed boundary change for Zone A, and address changes in various laws and executive orders since the issuance of the original record of decision (ROD) in 2008. The SEIS includes an updated traffic analysis, which proposes mitigation measures that consider a range of strategies to reduce or eliminate potential impacts of the proposed development on the adjacent transportation network.

The DC Office of Planning (DCOP) provided comments on the supplemental EIS, indicating that the master plan is not responsive to new opportunities and challenges for the AFRH site, given the changing urban context and the impacts on public facilities and infrastructure. Further, DCOP stated they would like the site plan for Zone A to be substantially updated. To help address the new opportunities and challenges, AFRH has given DCOP the opportunity to provide comments that will inform the request for proposals process. DCOP has also indicated they would be willing to participate in a review of proposals if AFRH requests such assistance.

The District Department of Transportation (DDOT) also provided comments on the SEIS, questioning the appropriateness of mitigation measures proposed to address anticipated traffic impacts. Since that time, AFRH has clarified that it plans to update the mitigation measures in the SEIS based on the specifics of the selected developer’s proposal, which will be reflected in an updated record of decision (ROD). AFRH has indicated that implementation of the measures identified in the updated ROD will be a contractual requirement of the developer as part of the ground lease.
In light of the District’s comments on the SEIS and the master plan, staff recommends that the Commission encourage AFRH, NCPC, and the District to work together to address how the request for proposals process, the master plan, and/or mitigation measures can respond to new opportunities and challenges associated with a changing urban context.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

NCPC staff has reviewed this proposal for compliance with relevant guidance and has determined that it is not inconsistent with the policies established in the Federal Elements of the Comprehensive Plan for the National Capital. In particular, the project is supported by policies in the Federal Workplace, Urban Design, and Historic Preservation Elements.

National Historic Preservation Act

AFRH followed the Section 106 review process outlined in the 2008 PA developed for the master planning process to fulfill its National Historic Preservation Act (NHPA) responsibility. It conducted early consultation by distributing a memorandum for review to all consulting parties, then held a meeting with signatories to discuss comments received and resolve any potential adverse effects. No adverse effects were identified though this consultation process.

Because the Commission has an advisory authority on master plans, it does not have an independent responsibility to comply with the NHPA for this amendment. Additionally, as described in the MOU among AFRH, DC Office of Planning, and NCPC, all projects in Zone A will be subject to local regulatory controls. Accordingly, they will require review with the DC Historic Preservation Review Board, and will not require Section 106 consultation. The portion of fence that crosses the AFRH Zone, however, will be subject to Commission review pursuant to the National Capital Planning Act, and both AFRH and NCPC will have independent Section 106 responsibilities. AFRH will need to follow the historic preservation review process outlined in the PA for federal undertakings for this and any other project in the AFRH Zone.

National Environmental Policy Act

Pursuant to the requirements of the National Environmental Policy Act (NEPA), AFRH prepared an EIS to analyze the potential impacts associated with implementation of its original master plan. It issued a ROD to document its decision in 2008. Though the Commission is advisory in its review of master plans and does not have an independent NEPA obligation, NCPC environmental regulations allow NEPA analysis for an approved master plan to apply to future individual master plan projects that are subject to Commission review and approval. In the AFRH master plan, this includes any action proposed in the AFRH Zone, which would be retained for federal use. To meet the Commission’s NEPA obligation for projects in this zone, NCPC staff reviewed the AFRH final EIS and ROD, and completed a summary of environmental considerations, which was recorded in the July 2008 staff report for the final master plan.
As noted, AFRH is undergoing an SEIS process to reflect major changes since the development of the EIS and ROD. Staff has reviewed the draft SEIS, and notes that it does not make any substantive changes to the impacts determination or mitigation proposed for development in the AFRH Zone. For that reason, though AFRH will issue an updated ROD, NCPC will continue to use its July 2008 staff report to meet its NEPA requirement for projects in the AFRH Zone. No further NEPA compliance is required, as long as future projects in this zone are consistent with the environmental considerations described in that staff report.

With regard to the master plan amendment at hand, AFRH has determined that the ground lease itself is eligible for a categorical exclusion (CATEX) from further analysis under its NEPA regulations. Though the Commission does not have an independent NEPA obligation for the amendment, a portion of the modified fence line will traverse the AFRH Zone, and as described above, will be subject to Commission approval. NCPC staff has determined that this specific project qualifies for a CATEX pursuant to Section 601.12 (a)(2) of the NCPC Environmental Policies and Procedures, which applies to the “approval of the installation or restoration of minor site elements, such as…fences…” The CATEXs satisfied NCPC’s NEPA obligation for the portion of the fence that crosses through the AFRH Zone.

CONSULTATION

Coordinating Committee

Without objection, the Coordinating Committee forwarded the proposed final master plan to the Commission with the statement that the proposal has been coordinated with all participating agencies. The DC State Historic Preservation Office (SHPO) coordinated subject to the incorporation of previously submitted comments, which NCPC staff acknowledges have been addressed in accordance with the procedures outlined in the PA for the master plan.

DDOT coordinated, and noted that it had provided comments through the SEIS process. AFRH indicated that it intends to work to address comments from relevant District agencies as the development process continues. DDOT requested clarification from AFRH regarding the SEIS revision process, which NCPC staff noted would also be described at a high level in the NCPC staff report.

The DC Office of Planning coordinated, also noting that it submitted comments to AFRH on the SEIS—relaying general concerns about the site’s physical and social integration with the rest of the city and the proposed mitigation of transportation impacts. AFRH has offered the Office of Planning the opportunity to provide language to inform its upcoming RFP, which they plan to provide by March 1. The Office of Planning plans to articulate goals and expectations for how this new neighborhood on the AFRH property can be successfully integrated into the city to ensure it serves as a model of 21st century urban living that achieves a high standard of environmental sustainability, social equity, design excellence, and economic innovation. AFRH has indicated that a future master plan amendment would occur if refinements are made by the selected developer.
The Office of Planning hopes its broader concerns can be more substantially addressed during this process.

**ONLINE REFERENCE**

The following supporting documents for this project are available online:

- Project Synopsis
- Submission Materials

POWERPOINT (ATTACHED)
NCPC File #: MP060
Armed Forces Retirement Home
Master Plan Amendment #1

140 Rock Creek Church Road, NW
Washington, DC

Armed Forces Retirement Home

Approval of Final Master Plan
Project Information

Commission meeting date: March 1, 2018
NCPC review authority: 40 U.S.C. 8722(a) and (b)(1)
Applicant request: Approval of final master plan
Delegated / consent / open / executive session: Open session
NCPC Review Officer: Gerbich
NCPC File number: MP060

Project summary:
The Armed Forces Retirement Home (AFRH) in Washington, DC has submitted for Commission review and approval an amendment to its campus master plan, which was approved by the Commission in July 2008. AFRH maintains a 272-acre campus with more than 100 buildings and ancillary structures, which provide residences and related services for certain retired and former members of the Armed Forces. When the master plan was completed in 2008, the campus housed approximately 1,200 residents. AFRH is a non-appropriated independent federal agency, and as such, is hoping to use the master plan to leverage unused portions of its campus to sustain funding though a long-term lease with a private developer. The original master plan and current amendment will provide a basis for facilitating and directing this future development.

The master plan divides the campus into two primary zones: 1) the AFRH Zone, which houses the main AFRH campus and will be retained for federal use (191 acres), and 2) Zone A, which will be leased for private mixed-use development, including residential, office, research and development, institutional, medical, retail, and hotel uses (80 acres). Detailed guidance in the master plan outlines allowable land uses, building massing, street layouts, and parking supplies for this zone, which, per an agreement among NCPC, AFRH, and the District of Columbia Office of Planning, would be used to inform zoning of the subject property by the DC Zoning Commission.

This master plan amendment proposes a minor modification to the boundary of Zone A to include a heating plant and associated outbuildings (referred to as Parcel U), which were decommissioned by AFRH in 2013 when the campus developed more energy-efficient systems. Three buildings comprise Parcel U, two of which contribute to the AFRH Historic District, and one of which is a non-contributing structure. As described in the programmatic agreement developed for the site, the two contributing buildings will be adaptively reused in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, and the non-contributing structure may be demolished. The subject amendment also includes a modification to the proposed fence line between the AFRH Zone and Zone A.
2008 Master Plan

Master Plan Amendment

- AFRH ZONE
- NORTH
- NORTHEAST
- NORTHWEST
- OTHER AREA
- GOLF COURSE
- ZONE A

Legend:
- AFRH use
- To be developed by others
- Existing buildings to remain
- Zone boundaries
### Master Plan – Existing Conditions

<table>
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<tr>
<th>Parcel U Resource Name</th>
<th>Building Number</th>
<th>Status within the AFRH-W Historic District</th>
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<td>Storage Contamination Building</td>
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</table>
Master Plan – Access and Security Plan

2008 Master Plan

Master Plan Amendment

AFRH ZONE

ZONE A

Legend:
- New vehicular entry
- Existing entry to be reactivated
- Existing entry
- Swipe card access gate
- Manned access gate
- Proposed security line after development of all zones
- Property line
- Secure zone for AFRH
- Development zone outside of secure zone
- Existing buildings
- Existing chain link fencing
- Existing stone and masonry fencing
- Existing iron fencing
Master Plan Amendment

New proposed and improved existing street types:
- Type 1A-1 streets
- Type 1A-2 streets
- Type 1A-3 streets
- Type 1A-4 streets
- Type 1A-5 streets
- Type 1B-1 streets
- Type 1B-2 streets
- Type 1C-1 streets
- Type 1C-2 streets
- Type 1C-3 streets
- Type 2A streets
- Type 2B streets
- Type 2C streets
- Type 2D streets
- Type 3A streets
- Type 3B streets
- Bicycle path
- Existing buildings
- Proposed buildings

Type 3A
To match typical dimension of existing streets in AFRH-W

Type 3B
To match character of existing streets in AFRH-W, with added lighting, bicycle lanes, and sidewalk. Shared bike lanes (26’-0” carway, 56’-0” ROW)