

# ***Foreign Missions Center at the Former Walter Reed Army Medical Center***

## ***Record of Decision***

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## **1. Introduction**

The United States Department of State (DOS) announces its decision to develop a Foreign Missions Center (FMC) on the northwest portion of the former Walter Reed Army Medical Center (WRAMC) on 16<sup>th</sup> Street in Northwest Washington D.C. DOS will redevelop 31.7 acres for the construction of new chancery buildings by foreign governments. DOS acquired the land under the FMA of 1982 (U.S.C. 4301-4316), which facilitates the conduct of diplomacy and consular operations between the United States and foreign governments. This Record of Decision (ROD) documents the rationale for the decision.

DOS's decision is based on information and analysis contained in the Final Environmental Impact Statement (EIS) issued November 2017, the Supplemental Draft EIS issued March 2017, the Draft EIS issued February 2014, technical studies, and comments from Federal and District agencies, elected officials, organizations and individuals.

## **2. Purpose and Need for the Project**

The purpose of the project is to prepare a master plan for the long-term development of a FMC, under authorities of the Foreign Missions Act of 1982 (FMA), on the site of the former WRAMC in the District of Columbia. The master plan is intended to guide the development of a cohesive campus by establishing design and land-use planning principles for the construction of new buildings, roadways, green space, and utilities, while minimizing environmental impacts.

The need for the project is based on increased and high demand for foreign mission facilities in the District of Columbia, a lack of large sites for foreign mission development or redevelopment in the District, and the need for land to use in property exchanges with other countries. This scarcity has impacted DOS's ability to acquire properties in foreign nations.

DOS has an urgent need to meet the demand from foreign missions for modern and secure facilities within the nation's capital. World events such as the collapses in the 1990s of both the Soviet Union and Yugoslavia resulted in the creation of 21 new countries. Further, the rapid growth and prominence of countries such as Brazil, China, India, and Vietnam have had a significant impact on the diplomatic presence of such governments, as well as on DOS's reciprocal presence and operations in those countries.

In accordance with the FMA, DOS enters into property exchange agreements with other countries, whereby property is provided to foreign governments for the establishment of missions in exchange for DOS receiving similar property within their countries. In addition to the FMA, the 1961 Vienna Convention on Diplomatic Relations mandates that signatory nations, including the United States, must facilitate the acquisition of premises for foreign missions. However, the lack of suitable land for development or redevelopment and a full International Chancery Center (ICC) have inhibited DOS's ability to reciprocate.

DOS has a need to resolve stalled attempts to acquire property in certain countries to construct adequate and secure facilities for the conduct of American diplomacy and consular operations.

## **3. Alternatives Evaluated**

### **3.1. Development of Alternatives**

The site selection process for a new FMC was conducted by DOS and the National Capital Planning Commission (NCPC), beginning in 2003. Over a period of years, five potential federal properties in Washington, DC were considered, as well as privately owned land along the South Capitol Street Corridor/Anacostia River waterfront. The WRAMC was selected as the preferred location, based on criteria

DOS developed for site selection, including: 1) a federally-owned District of Columbia location 15 acres or greater in size; and 2) a contiguous parcel with existing utility infrastructure and convenient access to major traffic arteries and amenities. In addition, the WRAMC location on 16<sup>th</sup> Street has visual and symbolic connection to the White House and the historic embassy district centered on Meridian Hill, making it an appropriate location for the development of a new FMC. In November 2015, 31.7 acres of the former WRAMC property was transferred from the Army to DOS.

### **3.2. Alternatives Evaluated in the DEIS**

During the master planning process, DOS identified and developed six potential design alternatives through collaborative planning and design work sessions with other federal and district agencies with direct or indirect jurisdiction over the proposed action, or an interest or special expertise. The six design alternatives were presented in the DEIS, published in February 2014.

Components common to the action alternatives consisted of cost-neutral funding, a minimum 50-year design life for utilities, on-lot storm water management, parking guidelines, and street design. Site and individual lot development parameters (size, floor area ratio, building coverage, and height restrictions) developed for each campus zone did not vary between the action alternatives.

Under the action alternatives, the existing historic perimeter fence along 16th Street and Alaska Avenue will be retained. The existing landscape on the west boundary of the site will be enhanced to create a 50-foot vegetated buffer, and the tree canopy will be preserved to the extent reasonably possible. Access to individual lots will be internal to the campus.

Assessment criteria were developed to help differentiate the alternatives. The assessment criteria consisted of: 1) maintaining and enhancing the existing site character, 2) responsiveness to the concerns raised during scoping, 3) minimizing the potential impacts to cultural resources, and 4) maximizing the marketability of the FMC as a whole, and individual parcels by allowing development flexibility.

Two alternatives were retained for detailed study within the 2014 DEIS: the No Action Alternative and Alternative 1, the DEIS Preferred Action Alternative. Subsequent to the publication of the DEIS, the total acreage of the land available for transfer from the Army to DOS was reduced from 43.5 to 31.7 acres through the National Defense Authorization Act of 2015 and a Supplemental Draft EIS was prepared.

### **3.3. Alternatives Evaluated in the Supplemental Draft EIS (SDEIS) and Final EIS (FEIS)**

DEIS Alternative 1 was dismissed from detailed study within the SDEIS because it was no longer viable given the change in total acreage required by the National Defense Authorization Act of 2015. DOS, in coordination with the Commission of Fine Arts (CFA), NCPC, the District of Columbia Historic Preservation Office (DC-HPO), and the District Department of Transportation (DDOT), then developed Alternative 7, which was identified as the Selected Action Alternative in the FEIS, published in November 2017. The Selected Action Alternative adjusts the master plan design to reflect the acreage change, and to respond to comments from other federal agencies, district agencies, and the public on the DEIS and SDEIS.

#### **3.3.1. No Action Alternative**

Under the No Action Alternative, DOS would not take ownership of the 31.7-acre portion of the former WRAMC and would not create a master plan to develop the FMC. DOS would continue to face challenges in facilitating the provision of adequate and secure facilities for foreign missions. The lack of readily available parcels within the District of Columbia for the development of foreign mission facilities would persist, and the high demand for foreign mission facilities would continue to grow. DOS's inability to

reciprocally acquire properties in other countries would increase, and delays in updating U.S. diplomatic and consular properties abroad to meet modern security requirements would continue.

The No Action Alternative was retained for detailed study and the consequences of the No Action Alternative were fully developed for the year 2032 to demonstrate the full impact of taking no action. This provides a baseline comparison with the action alternatives. The year 2032 represents the earliest completion of the planned build-out of the FMC over an approximate 15 to 20-year period.

### **3.3.2. Selected Action Alternative**

Alternative 7 was identified as the Selected Action Alternative because it furthers the purpose of the project and satisfies the needs for the project while best maintaining and enhancing the existing site character of the former WRAMC; addressing community concerns raised during scoping; minimizing potential impacts to cultural resources; and maximizing marketability by allowing the greatest flexibility in developing the site.

The Selected Action Alternative will provide a maximum of 15 lots for chancery development. Two or three smaller lots will surround the chapel. This design compliments the urban development pattern planned by Children's National Medical Center (CNMC) and District of Columbia's Walter Reed Army Medical Center Local Redevelopment Authority for this zone of the former WRAMC. The design for this quadrant also allows for tree coverage and accommodates the vegetative buffer along Alaska Avenue. Green space will surround the chapel to maintain its setting.

The section of 14th Street north of Dahlia Street will be moved approximately 30 feet to the east to provide sufficient lot sizes in the northwest quadrant. The end of 14th Street is planned to terminate in a cul-de-sac centered on Building 54/Armed Forces Institute of Pathology's (AFIP) main entrance. Building 54, a historic district contributing resource located on the CNMC portion of the former WRAMC, is planned to be reused as a research laboratory. Access from the 14th Street cul-de-sac to Alaska Avenue will be through a 30-foot wide paved access path that will accommodate pedestrians and bicycles.

On the southeastern portion of the site, Building 40/Walter Reed Army Institute of Research, and Building 41/Old Red Cross Building, both contributing resources to the WRAMC Historic District, could remain for potential adaptive reuse, depending on marketability. During project coordination meetings, interest was expressed by foreign missions in reusing Building 20/Mologne House, Building 56/Fisher House No. 3, and Building 32/Wagner Sports Center, which are not historic district contributing resources. Several parcelization options under the Selected Action Alternative are provided to increase flexibility and allow for the reuse or expansion of these existing buildings.

Under the Selected Action Alternative, Dahlia Street and 14th Street will be developed as a boulevard and as a parkway respectively supporting pedestrian, bicycle and vehicular traffic connections to the surrounding neighborhoods. In the southwest quadrant, the landscaping bordering 14th Street will be widened between the traffic lanes to create a landscaped median. This low-lying green space along with tree boxes between the streets and sidewalks will assist with the filtration of rain water from the FMC, reducing stormwater runoff. Several parcelization options are shown for this quadrant to provide marketing flexibility and respond to foreign missions' expressed interest in reusing non-historic Building 56/Fisher House #3.

Under the Selected Action Alternative, public access will be maintained along streets within the FMC except in limited instances where security requires the need for temporary closures (such as national emergencies).

The primary vehicle entrance for the FMC from the south will be at the intersection of Main Drive and 14th Street. Secondary entrance will be from the west at the intersection of Alaska Avenue and Dahlia Street and from the east at Dahlia Street. The proposed access points correspond to previously used, and now closed, access locations from the former WRAMC. The Dahlia Street access point at Alaska Avenue was closed by the Army in 2001, but the plan proposes that this be reopened. The driveways will be stop controlled. A DDOT permit will be required to connect the FMC to the District's road network.

The Selected Action Alternative will require that chancery parking (employees, visitors, and delivery vehicles) be contained within the confines of each chancery property. Each foreign mission will be required to meet 100 percent of its parking needs within its lot at the time of occupancy and at 10 years after occupancy. The projected number of employees was calculated using the estimated maximum building square footage (approximately 920,000 sq. ft.). It was estimated that there will be one employee per 500 square feet and that for every employee, 1.05 parking spaces will be provided. In addition, visitor parking was included based on five percent of the employee parking. Therefore, the planned number of parking spaces reflects the maximum number of projected parking spaces to be constructed on-site. Through the Transportation Management Plan (TMP), chanceries will be encouraged to limit on-site parking needs and to use public transportation.

The FMC Master Plan specifies that the majority of parking be provided in below-grade lots. Existing buildings that are reused will be required to develop independent below-grade parking solutions and new buildings will need to incorporate parking within their lot in below-grade structures. Under the Selected Action Alternative, on-street parking within internal FMC roadways will not be permitted. Current parking allowances on internal FMC roadways will be removed upon implementation of the Selected Action Alternative. The parking garage associated with the CNMC exceeds the parking needs of the CNMC; therefore, excess parking spaces within the existing garage may be an option for additional parking.

## **4. Public Comments**

Individuals, groups, and agencies were provided several opportunities to provide comments during the EIS process. Comments received during the 45-day scoping period for the DEIS in June-August of 2012 were considered in the identification of key issues requiring analysis. Comments received during the 45-day public comment period for the DEIS in February and March of 2014 were considered in the preparation of the SDEIS. DOS's responses to comments on the DEIS were provided in the SDEIS. Comments received during the 45-day public comment period for the SDEIS in April and May of 2017 were considered in the preparation of the FEIS. DOS's responses to comments on the SDEIS were provided in the FEIS.

DOS considered comments received during the 30-day public review period for the FEIS in the preparation of this ROD. Several comments were similar to those received on the SDEIS and therefore were previously considered and addressed in the FEIS. Five comment letters were received with comments warranting specific responses as addressed below.

### **4.1. U.S. Environmental Protection Agency**

#### **Comment #1-1**

EPA maintains the recommendation to remediate PCBs to meet unrestricted use concentrations (0-1 ppm) whenever possible. Building 40 remains a concern, due to the PCB contamination present there. If considered for adaptive reuse, remedial efforts should meet or be less than the acceptable concentration for the anticipated building use. Technologies to remove PCBs from concrete should be explored. Additionally, further groundwater testing in this area is recommended.

**Response to Comment #1-1**

Page 3-46 of the FMC Master Plan states: "The EPA allowed the Army to remediate PCB ground contamination areas for reuse as a hospital (commercial/industrial land use). If the contaminated land is to be used for more restrictive use (i.e. residential or educational), additional site clean-up may be required. Also, deep excavation for underground parking may require additional remediation."

Under stipulations in the Programmatic Agreement (PA), DOS will consult with EPA to determine whether the requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) apply to Building 40 or 41. Through the CERCLA process, the DOS will take or to the extent feasible ensure the lessee undertakes remediation actions necessary to assure protection of human health and the environment. DOS will request funding through their annual budget for an environmental analysis to include remediation assessment and implementation for Building 40.

**4.2. National Capital Planning Commission**

**Comment #2-1**

NCPC requests that the Department of State include traffic and level of service data related to the benefits/constraints of closing the 14th Street, NW connection to Alaska Avenue. It will also be helpful to understand how the cul-de-sac option leads to greater State Department control of the street.

**Response to Comment #2-1**

The comprehensive transportation review (CTR) report prepared by Gorove Slade for DOS in January 2017 reflects the cul-de-sac option. As requested by DDOT, Gorove Slade also completed an additional review of the vehicular capacity analysis results of the FMC as related to the 14<sup>th</sup> Street cul-de-sac option, and prepared a revised version of the FMC CTR report in March 2017, and subsequent Comment Response Memorandums submitted to DDOT in June and August of 2017.

Limiting through traffic at 14th street provides a number of lots that are not on a common path of travel, i.e., motorists will only be on this section of road if they were searching specifically for a particular foreign mission there. This level of privacy or seclusion is very desirable by some foreign missions that prefer to maintain a low profile. The ability to market lots with this kind of limited access is very important to the success of the FMC.

**Comment #2-2**

We note that since the Section 106 process is ongoing and the programmatic agreement is still in draft form, the Department of State should reflect any changes to the proposed mitigation and programmatic agreement in the FEIS.

**Response to Comment #2-2**

The PA was finalized on 4 December 2018, which concluded the Section 106 process. See ROD Appendix A for the final PA.

**Comment #2-3**

We support and applaud the Department of State for developing a tree inventory for the FMC and encourage you to protect existing mature heritage trees identified in the survey on individual parcels.

**Response to Comment #2-3**

The FMC Master Plan states the intent to preserve heritage trees and large diameter trees that are in good condition, including preservation of the critical root zone on page 3-24. FMC Master Plan page 5-22 states that foreign missions are strongly encouraged to obtain a Heritage Tree Removal Permit through the DC Urban Forestry Administration. Figure 5-24 of the FMC Master Plan identifies large and heritage tree

critical root zones which are in good condition to guide new missions in site development in regard to these large and special trees.

**Comment #2-4**

While we understand that only the landscape south of Building 1 on the District of Columbia portion of the former Walter Reed Army Medical Center is contributing to the historic district, the tree canopy on the FMC is in essence an extension of the Rock Creek Park across 16th Street, NW to its west. Protecting the existing tree canopy between 16th Street, NW is a priority in order to maintain the visual connection between the FMC and Rock Creek Park.

**Response to Comment #2-4**

The master plan describes the vegetative buffer surrounding the FMC on page 4-26:

- “At Alaska Avenue edge, maintain existing vegetative, landscape buffer in 10-foot DC right of way between Perimeter Fence and FMC property line. Provide additional 40-foot vegetative, landscape buffer within FMC. This portion within the FMC will be maintained by the foreign missions.
- At 16th Street edge, maintain existing vegetative, landscape buffer in 40-foot DC right of way between Perimeter Fence and FMC property line. Provide additional 10-foot vegetative, landscape buffer within FMC. This portion within the FMC will be maintained by the foreign missions.
- Tree preservation within Buffer Zone will substantially conform to DC tree preservation regulations.”

Master plan pages 5-21 and 5-22 describe the tree preservation component of the plan. The master plan language is summarized below:

Site plans will take into consideration existing Heritage Trees and Special Trees in their respective layouts and provide ample root volume to adequately preserve these existing trees. These trees will be identified for the foreign missions via a certified arborist by DOS. Buildings, structures and paved areas should be placed with the existing trees in mind to not only preserve the tree, but obtain the greatest value from the existing canopy and other positive attributes.

It is recommended that each site plan take creative measures that work towards the preservation of existing Heritage Trees where possible (e.g., cantilevered building areas). Foreign missions are strongly encouraged to obtain a Heritage Tree Removal Permit through the DC Urban Forestry Administration (UFA). Any *Heritage Tree* that will have disturbance within its CRZ should have its own tree protection program devised by a certified arborist per DDOT regulations. *Heritage Trees* which are not able to be preserved should require a thorough explanation as to why (i.e. detrimental to a functional layout, failing condition, etc.) and provided as part of the design review process.

Foreign missions are strongly encouraged to obtain a Special Tree Removal Permit through the DC UFA. DCMR Chapter 24-37 for Special Trees provides direction for replacement trees when a *Special Tree* or *Heritage Tree* is removed. These regulations stipulate the replacement of a *Special Tree* or *Heritage Tree* with a number of saplings on minimal size whose aggregate circumference equal or exceeds the circumference of the tree to be removed. DOS encourages substantial compliance by the foreign missions with these local regulations.

### 4.3. District of Columbia Historic Preservation Office

#### **Comment #3-1**

The greatest adverse impact foreseen by the EIS is the demolition of numerous buildings that contribute to the character of the Walter Reed Army Medical Center Historic District. This impact should be clearly stated and characterized. The buildings proposed to be razed should be listed in the main text, on pages 122-123, and depicted on a map as being demolished.

#### **Response to Comment #3-1**

The FMC site includes 16 existing buildings, all of which were evaluated for potential reuse by a foreign mission. 11 of the 16 buildings were identified as contributing to the WRAMC Historic District. 8 of those 11 buildings are residential structures that were not constructed by the Army but were absorbed as part of the campus when the site was expanded to the north. DC-HPO has signed the PA which clearly states the adverse effects; the intention for development, and the agreed mitigations which are part of that agreement (see Appendix A).

#### **Comment #3-2**

The preferred action should be explicitly categorized as constituting major, direct and long-term (i.e., permanent) physical impacts on the resources themselves and on the integrity of the historic district.

#### **Response to Comment #3-2**

DC-HPO has signed the PA which clearly states the adverse effects; the intention for development, and the agreed mitigations which are part of that agreement (See Appendix A).

#### **Comment #3-3**

Both the demolition and the new construction should be acknowledged as potential indirect impacts on the remaining resources, because of physical and visual effects upon their setting (including that of Building 57; page 123 only anticipates potential direct alterations to the chapel, for instance, from its adaption to reuse).

#### **Response to Comment #3-3**

A critical aspect of the development history of the WRAMC is that buildings were added and removed on a regular basis based on the programmatic needs at a point in time. The campus as it existed in 1956, the end of the period of significance, is quite different from what exists today. Leaving the pre-1956 buildings in place and removing all other structures would not reconstitute the campus as it existed at that time. In this case "integrity" is a challenging attribute to quantify and assess.

DC-HPO has signed the PA which clearly states the adverse effects; the intention for development, and the agreed mitigations which are part of that agreement (see Appendix A).

#### **Comment #3-4**

The design guidelines allow security fences up to ten feet tall, which seems excessive in itself, but may also result in the physical alteration of the historic perimeter fence.

#### **Response to Comment #3-4**

The existing perimeter fence will not be modified in the development of the FMC, with the exception of modifications to the entry gates on Alaska Avenue and Fern Street to adjust to the proposed streets and sidewalks. The fences described in the design guidelines will be new fences on the individual properties. The height is set based on what the US requires at sites in other countries.

**Comment #3-5**

With the exception of the chapel, historic buildings disappear from the proposed plans or are depicted with dashed outlines—or either/both, depending on which map is consulted. Our concern remains that such a depiction, and the accompanying text, invite their removal.

**Response to Comment #3-5**

The Selected Action Alternative is clear that the residential structures at the western edge of the site will be removed. The Chapel (Building 57) will be renovated by the DOS. The remaining two contributing buildings, 40 (WRAIR) and 41 (Red Cross) are being actively marketed by DOS to foreign missions for reuse. If a partner is identified that is interested in reusing either of these buildings, in total or in part, they will be retained.

**Comment #3-6**

Page 31 states that the preferred alternative was selected, in part, because it best minimizes potential impacts to cultural resources. We are not convinced, however, because the EIS does not state as required “whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and, if not, why they were not” (page 14).

**Response to Comment #3-6**

The process for developing the options for development of the FMC is described in FEIS Chapter 2.0 Alternatives Analysis. The process included evaluating a series of parameters, including historic preservation. The Selected Action Alternative provides the best balance of the range of parameters evaluated.

**Comment #3-7**

This EIS has been flawed in that it has not proposed or studied a maximal preservation alternative; the previous alternatives were roughly equivalent, an almost random reshuffling of similar ideas that did not sufficiently avoid adverse effects.

**Response to Comment #3-7**

The potential for maximizing preservation and reuse of all the contributing buildings was undertaken by evaluating the potential reuse of each building through design charrettes, to which the DC-HPO was an invited participant. The reuse of the residential structures as chanceries was determined to not be feasible due to the size, configuration and condition of these buildings.

**Comment #3-8**

On page xvi, it is stated that “the No Action Alternative would result in the continued deterioration of historic resources.” This is true in the short term, and true if no one could ever take an action, but the conclusion overlooks the near certainty that another entity would acquire the property if it did not become an FMC.

**Response to Comment #3-8**

There was no action alternative in which the DOS was not going to utilize the property for use as an FMC. As such, if a contributing building had to remain but could not be converted for use as a chancery it would result in the continued deterioration of the historic resource.

**Comment #3-9**

We recommend removing from the appendices the July 2017 draft of a programmatic agreement to resolve effects pursuant to the National Historic Preservation Act. It is sufficient to state in the text that consultation continues on such an agreement. It would be misleading to imply that this version accurately represents the text upon which we may ultimately agree.

**Response to Comment #3-9**

The PA was finalized on December 4, 2018, and has been included in this ROD as Appendix A. In addition, the ROD reflects the language included in the final PA.

**Comment #3-10**

Neither the PA draft nor the EIS sufficiently address retention of Buildings 40 and 41, and neither contains sufficient mitigation for the removal of even the residential buildings. The proposed mitigation is mostly minimization of future effects.

**Response to Comment #3-10**

Section 4.2 (page 4-17) of the FMC Master Plan addresses the potential reuse of Buildings 40 and 41 by stating that “Within this alternative, two of the historic buildings within the boundary of the proposed FMC, Buildings 40 and 41, have been identified for potential reuse. This is dependent, however, upon DOS identifying and entering into an agreement with a foreign mission to reuse these buildings.” The signed PA (December 4, 2018) includes mitigation measures that have been agreed to by all of the signatories, including the DC-HPO.

**Comment #3-11**

On page 25, the Armed Forces Retirement Home-Washington is dismissed as an alternative location because of its relative marketability and its distance from other embassies, yet it is the same distance from the Van Ness International Center as Walter Reed, half the distance from downtown (and roughly the same distance from downtown as Van Ness). NCPC’s 2013 “Draft Foreign Missions and International Organizations Element Updated Policies” were written with the purpose of redirecting the FMC to Walter Reed after the installation closed, but the Comprehensive Plan of the National Capital encourages “priority consideration for the location of a new foreign missions center” at AFRH. This should be kept in mind with the reduction of the Walter Reed FMC parcel and the State Department’s obligation to protect historic buildings.

**Response to Comment #3-11**

The decision to place the FMC on the parcel of land transferred from the Army to DOS at the former WRAMC is final and was based on input and consultation with other agencies including CFA and NCPC. The 2016 Comprehensive Plan for the National Capitol- Foreign Missions and International Organizations Element clearly outlines the decision to place the FMC at WRAMC as opposed to any other location:

*“After several years of considering the suitability of other locations throughout the District, the State Department concluded that the former Walter Reed Army Medical Center site presented a viable option for the development of a foreign missions center of a similar size and scale to the existing International Chancery Center. 16th Street is one of most important streets in Washington, with visual and symbolic connections to the White House and the historic embassy district centered on Meridian Hill, making it an appropriate location for the development of a new international center.”*

**Comment #3-12**

We recommend an express commitment to the retention of historic buildings and a more robust mitigation effort.

**Response to Comment #3-12**

See response to comment #3-10.

#### 4.4. District Department of Transportation

##### Comment #4-1

DDOT provided three prior letters with formal comments on the FMC process (August 11, 2016, February 14, 2017, and April 26, 2017) which are not noted and addressed in the FEIS.

The FEIS is expected to be updated to reflect DDOT's prior comments.

##### Response to Comment #4-1

The three DDOT letters have been added to the ROD as Appendix B. DOS provided responses to the DDOT letters through a continuing coordination process during the development of the FEIS, including a technical memorandum response memo dated August 11, 2017, also found in Appendix B. The FEIS reflects changes resulting from the DDOT coordination process.

Regarding DDOT comments remaining on the April 26, 2017 DDOT Letter, the FMC Master Plan addresses DDOT comments as follows:

*14<sup>th</sup> Street Design – Changes are needed for the 14<sup>th</sup> Street design to encourage low speeds. As proposed, the separated portion of 14<sup>th</sup> Street features 20 feet of pavement in each direction, which includes a 4 foot shoulder and combined 16 foot travel lane and bike lane. While DDOT understands the separated portion of the street must maintain 20 feet of clearance to qualify as a fire lane, as designed the road is excessively wide and could encourage speeding. DOS should coordinate with DDOT to explore alternate design options that satisfy fire lane requirements while encouraging low speeds. Possible solutions include varying pavements, materials, markings, and textures, and dedicated bicycle facilities.*

The FMC Master Plan calls for traffic calming measures to be included on 14<sup>th</sup> Street on page 4-27.

*Dahlia Street design – Dahlia Street west of 14<sup>th</sup> Street should include a minimum 4 foot tree box on the north side of the street.*

The FMC Master Plan refers to DDOT guidelines for tree box standards on page 4-23.

*Bicycle lanes – Bicycle lanes throughout the site should be widened from 4 feet to 5 feet to meet DDOT standards. Text on Page 4-21 calls for 5 foot bicycle lanes but street cross sections show 4 foot lanes.*

Bicycle Lanes have been increased to 5' per DDOT standard.

*Street Width – DDOT recommends a 30 foot cartpath (two 5 foot bicycle lanes and two 10 foot travel lanes) for all private streets with two travel lanes, two bicycle lanes, and no parking. 10 foot travel lanes also match the proposed travel lane width on LRA streets.*

The FMC Master Plan shows 10' travel lanes that match the LRA development for safety, and 15' travel lanes where bike lanes are required for a total 30' cartpath.

*Pedestrian Curb Ramps – The Master Plan states that one curb ramps will be provided at each corner of an intersection (Page 4-23). DDOT standards call for two curb ramps at each corner to account each pedestrian movement.*

The FMC Master Plan standards for curb ramps are listed on page 4-24: “Accessible curb cuts for sidewalks will be provided at intersections located within the crosswalks and/or pedestrian paths of travel. Curb cuts will be constructed to be compliant with ADA and UFAS design standards. Page 4-22 of the FMC Master

Plan states: “Since the streets are extensions of the existing city grid, the streets shall be bituminous concrete (asphalt) and shall be built to DDOT standards including two curb ramps, lane and cross walk markings.”

*Short-term bicycle parking – The Master Plan states that “no street furnishings fixed or movable” including bike racks will be permitting “on or adjacent to FMC sidewalks” (Page 4-23). Short-term bicycle parking within the streetscape will be important to accommodate bicycle demand for the site. DDOT expects that short-term bicycle parking spaces will be located in easily accessible spaces in close proximity to primary building entrances.*

In the FMC Master Plan (Page 5-25), the minimum requirement for short term bicycle parking is identified to be: 1) minimum one space per each 40,000 gross square foot, 2) located on chancery lots within 120 feet of a primary entrance, and 3) in conformance with DC Zoning regulations.

*Alaska Avenue/14th Street vehicular connection - The Master Plan states that the 14th Street & Alaska Avenue intersection will be closed to vehicular traffic (Page 4-25). Per DDOT's February 14, 2017 letter, the CTR identifies several impacted intersections not proposed to be mitigated, including 16th Street & Main Drive and Dahlia Street & Alaska Avenue. Impacts at these intersections are caused in large part by the exclusion of a vehicular access point at the 14th Street/Alaska Avenue intersection. Vehicle access at this location is needed to distribute site traffic and reduce impacts at the other access points. The Master Plan should be updated to reflect the vehicular connection at this intersection.*

The connection at 14th Street will be pedestrian/bicycle only. This minimizes impacts to historic resources, as 50 to 60 linear feet of the historic fence would need to be removed for the through-street option. Mitigations as discussed with DDOT and documented in meeting notes from the August 11, 2017 meeting have been incorporated into this document and into the master plan.

*Site access approach - The Master Plan states that "primary access to the chancery will be from the primary frontage" and defines Main Drive as a primary street. Per DDOT's February 14, 2017 letter, parcels with access to the DOs street network are expected to provide vehicular site access from such streets and not from Main Drive. Any proposed curb cuts from Main Drive would require DDOT approval and would need to meet DDOT standards.*

Curb cuts along Main Drive will be limited except where no other frontage affords access to lots.

*Heritage Tree preservation - The Master Plan states that "it is recommended that each site plan take creative measures that work towards the preservation of existing Heritage Trees wherever possible" (Page 5-22). Heritage Trees are defined as a tree with a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. DOS should coordinate with DDOT's Urban Forestry Administration (UFA) to identify Heritage Trees on site and evaluate their condition. Healthy Heritage Trees might be permitted to be relocated only with approval by the Mayor and the Urban Forestry Administration. Accordingly, buildings will be required to be designed such that they avoid conflicts with and preserve non-hazardous Heritage Trees.*

While DOS is exempt from these requirements, the FMC Master Plan states the intent to preserve heritage trees and large diameter trees that are in good condition, including preservation of the critical root zone on page 3-24. Master Plan page 5-22 states that foreign missions are strongly encouraged to obtain a Heritage Tree Removal Permit through the DC Urban Forestry Administration. Figure 5-24 of the Master Plan

identifies large and heritage tree critical root zones which are in good condition to guide new missions in site development in regard to these large and special trees.

*Access & Easements - The Master Plan should clearly describe the easement arrangements discussed by DOS, LRA, and DDOT (Figure 4.13 and Page 4-12). The Master Plan should be updated to include the following:*

- *Include a legend describing the meaning of each color on the map.*
- *Denote a public access easement for all streets and sidewalks within the LRA. Maintaining public access except in limited instances of security justification is needed. Per DDOT's February 14, 2017 letter, DOS should coordinate with DDOT to define a process and establish thresholds for security-related street closures. In addition, if desirable by DDOT or the Washington Metropolitan Area Transit Authority, DOS should allow bus routes and stops on the private streets.*
- *Denote the 15 feet public access easement north of the north curblines of Main Drive along the entirety of the DOS property.*
- *Maintain the interior of the oval (between the curbs) as a DOS property under DOS maintenance. DDOT will not accept ownership or maintenance responsibility of the interior of the oval.*

All required easements have been notated throughout the FMC Master Plan. The interior of the oval has been shown as DOS property.

*Transportation Management Plan - The Master Plan states that "all chanceries [will] provide a Transportation Management Plan to be reviewed by DDOT during chancery design" (Page 5-7 & Page 5-26). Clarify and define the processes through which DDOT would be engaged in the Design Review process and, in particular, the Transportation Demand Management Plan, including level of authority (advisory or approval).*

Page 5-27 of the FMC Master Plan identifies the process and approvals for the TMP for each new chancery development.

*Public Space Permits - Work in public space will require DDOT public space permits - All chanceries with frontage on a public street will be required to improve the public space adjacent to the property to current DDOT standards. Any work in public space, including driveways, paving, steps, and ramps must be designed to DDOT standards and will require public space permits from DDOT.*

The NCPC will act as the reviewing agency using the review criteria established in the Foreign Missions Act of 1982. The process is to include a broad spectrum of input including local ANC, CFA, and DC agencies such as DDOT and DC-HPO.

#### **Comment #4-2**

The CTR identifies several impacted intersections not proposed to be mitigated, including 16th Street & Main Drive and Dahlia Street & Alaska Avenue. Impacts at these intersections are caused in large part by the exclusion of a vehicular access point at the 14th Street/Alaska Avenue intersection. Vehicle access at this location would distribute site traffic and reduce impacts at the other access points.

At a DDOT/DOS meeting on July 12, 2017, DDOT agreed that while a connection to Alaska Avenue was still desired as a way to mitigate the action's impacts, DOS would not provide a connection of 14th Street to Alaska Avenue on the condition that DOS commit to not preclude a future connection either by DOS or

another entity. This commitment would entail excluding a future chancery building from occupying the footprint of a 14th Street connection to Alaska Avenue. However, such a commitment is not included in the FEIS.

The FEIS is expected to be updated with a commitment to not preclude a future vehicular connection of 14th Street to Alaska Avenue by committing to a building prohibition in the area that would serve as a 14th Street connection to Alaska Avenue.

**Response to Comment #4-2**

Page 3-51 of the FMC Master Plan contains a summary of the traffic analysis which states: "The traffic analysis assumed that the only entrance serving the FMC development would be the intersection of Main Drive and 14th Street. The results of this study are that the FMC development vehicular traffic could be accommodated by one access point." See pages 5-10 and 5-30 of the Master Plan which shows the allocated greenspace for the entire right of way of 14th Street up to Alaska Avenue. The master plan has been developed to show the right of way for 14th Street to remain clear of any future buildings using required setbacks.

**Comment #4-3**

DDOT's letter dated April 26, 2017 identifies needed changes to the 65% Design Guidelines (primarily Chapters 4 and 5) to ensure a safe and efficient transportation network internal to the FMC site that is consistent with the existing surrounding public streets and streets planned as part of the LRA street network.

DOS did not provide formal responses to DDOT's comment letter. Furthermore, the FEIS does not include the entirety of the final Design Guidelines, including street design guidelines, as an attachment therefore it is unclear if DDOT's comments have been satisfactorily addressed.

DDOT expects responses indicated DOS's responses to DDOT's April 26, 2017 comments. The FEIS is expected to be updated to include the final Design Guidelines that have been updated to satisfactorily address DDOT's comments in the April 26, 2017 letter. DDOT requests an opportunity to review the draft final Design Guidelines before they are published.

**Response to Comment #4-3**

See response to comment #4-1.

**Comment #4-4**

The CTR identified impacts at this intersection necessitating a 100' westbound right turn lane, which DOS committed to in an August 11, 2017 letter to DDOT. This letter is not included as an attachment to the FEIS nor is the commitment by DOS to install this turn lane explicitly included in the FEIS.

The FEIS is expected to be updated to include a commitment to install a 100' westbound right turn lane at the Dahlia Street & Alaska Avenue intersection.

**Response to Comment #4-4**

The August 2017 Comment Response Memorandum has been included in ROD Appendix B. DOS has committed to install a 100' westbound right-turn lane and to maintain the current orientation of the intersection.

**Comment #4-5**

DDOT acknowledges the inclusion of funding and first year's operating expenses for two Capital Bikeshare stations as mitigations, as requested by DDOT. One of the stations will serve as a mitigation in lieu of the 16th Street/Sherrill Drive/ Aspen Street southbound right turn lane. As indicated in the FEIS, one of the

stations would be located on-site and another in close proximity to the Takoma Metro station. Additional details regarding the commitment and an implementation timeline are needed.

The FEIS is expected to be updated to reflect the following:

- Specify that a minimum of 19-dock Capital Bikeshare stations will be provided;
- Specify that the on-site bikeshare station will be provided prior to the opening of the first chancery; and
- Specify that the off-site bikeshare station will be provided by 25% build-out of the site.

**Response to Comment #4-5**

The FEIS identifies this mitigation in exhibit 3.11, item 6: “To mitigate this impact, DOS would encourage a reduction in auto mode travel by funding the installation and first year’s operation expenses of a new 19-dock Capital Bikeshare station on the FMC property. DOS would also fund the installation and first year’s operating expenses for a second Capital Bikeshare station at the Takoma Metrorail station or in the adjacent neighborhood.”

The Master plan identifies a DOS commitment to allocate a Capital Bikeshare Station at the intersection of Dahlia Street and 14th Street and support an additional Capital Bikeshare Station at the Takoma Metro station on page 4-20.

**Comment #4-6**

Exhibit 1.2 in the FEIS shows a pedestrian/bicycle connection from the west side of the 14th Street cul-de-sac to the 14th Street/ Alaska Avenue intersection. A connection on the east side of the cul-de-sac is not shown.

The FEIS is expected to be updated to include connections from both the east and west side of the 14th Street cul-de-sac to the 14th Street/ Alaska Avenue intersection.

**Response to Comment #4-6**

The right of way for 14th Street is shown on the FMC Master Plan to remain clear of building construction. At the cul-de-sac, cyclists will be able to access bike lanes on either side of 14th Street without having to cross vehicle lanes. Inserting two bicycle paths 24' apart will not improve connectivity or safety from the cul-de-sac to Alaska Avenue and will unnecessarily create more impervious surface, contradicting sustainability goals.

**4.5. DC Office of Planning**

**Comment #5-1**

DOS is encouraged to reconsider the closing of 14th Street, NW to vehicular access at Alaska Avenue, NW, where there is a cul-de-sac terminus in the selected alternative in the FEIS. The Office of Planning concurs with the NCPC’s March 2, 2017 report which “recommends DOS explore connecting 14th Street, NW to Alaska Avenue, NW to complete the street network in this part of the District.” ... If DOS is unable to maintain vehicular access at 14th Street, NW and Alaska Avenue, NW, please commit in the FEIS to not preclude this future connection either by DOS or another entity. This commitment would entail excluding a future chancery building from occupying the footprint of a 14th Street connection to Alaska Avenue.

**Response to Comment #5-1**

See response to comment #4-2.

**Comment #5-2**

DOS is encouraged to employ a Complete Streets design for all internal roadways of the Foreign Mission Center at the Former Walter Reed Army Medical Center that provide a safe and comfortable environment for walking and biking.

**Response to Comment #5-2**

The master plan incorporates strategies associated with this policy document.

**Comment #5-3**

DOS is encouraged to incorporate a recommendation in the Design Guidelines for reducing curb cuts on internal roadways through the use of shared driveway access for chanceries or other means in order to provide a safe and comfortable environment for walking and biking.

**Response to Comment #5-3**

Page 5-26 of the Master Plan describes controls on curb cuts: "Each lot will have at least one (1) but not more than two (2) access drives to the abutting public street on which the lot fronts. Single lane access drives will not exceed 12 feet in width at the lot line. Two lane access drives will not exceed 20 feet in width at the lot line. All access drives will meet the elevations of curbs, gutters and roadways. Locate access points requiring a curb cut a sufficient distance (not less than 33 feet) from any street intersection so as not to disrupt traffic flow.

- Each chancery will have at least one vehicular entry per lot;
- Two vehicular entries will be allowed on larger lots;
- Curb cut must have minimum 3 feet radius and maximum 6 feet radius.

The design of access driveways will be provided with adequate sight distances and turn-around areas for trucks within the access drive and substantially conform to DC Zoning and DDOT requirements."

**Comment #5-4**

DOS is encouraged to incorporate policies contained in the Foreign Missions and International Organizations Element and the Urban Design Element of the Comprehensive Plan for the National Capital regarding the appropriate use of security features.

**Response to Comment #5-4**

The master plan states on page 4-25: "While no additional structures are planned at this date, additional Guard Houses or Security Structures may be needed in the future at FMC access points or key street intersections. Design of new Guard Houses or Security Structures will conform to the DC-HPO Guidelines for New Construction in a historic district."

**Comment #5-5**

DOS is encouraged to orient future chanceries to follow a pattern of the neighborhood while design of buildings, grounds, and security should respect the open feel and design of the campus. Chanceries and embassies should present an attractive street frontage on all sides with a park-like character facing 16th Street and Alaska Avenue. Buildings should have public entrances accessible from the streets they front.

**Response to Comment #5-5**

The master plan has been developed with, and approved by, the Commission of Fine Arts. The master plan states that: "Private frontage elements and building entries will be oriented to the primary street address."

## **5. Decision**

Based on consultation with coordinating agencies and Section 106 of the National Historic Preservation Act consulting parties; consideration of potential environmental consequences; foreign mission requirements; safety and security considerations; availability of resources; and public comments on the DEIS, SDEIS, and FEIS; it is my decision, as DOS Deputy Assistant Secretary for the Bureau of Administration, to implement the Selected Action Alternative (Alternative 7), development of the master plan for a new FMC on the former WRAMC property in Washington, DC.

The Selected Action Alternative meets the purpose of the project and satisfies the needs for the project while best maintaining and enhancing the existing site character of the former WRAMC; addressing community concerns raised during scoping; minimizing potential impacts to cultural resources; and maximizing marketability by allowing the greatest flexibility in developing the site.

After carefully weighing the information presented in the FEIS, I have determined that the Selected Action Alternative best meets the project's purpose and need while minimizing potential environmental impacts to the greatest extent possible.

## **6. Environmental Consequences of the Selected Action Alternative**

The Selected Action Alternative will have the following environmental consequences.

### **6.1. Stormwater**

The capture and retention of storm water runoff within the FMC property will result in a beneficial impact to surface waters by contributing to reducing the occurrence of overflow combining with sanitary effluent in severe rain events. The water quantity controls for the Selected Action Alternative will be in accordance with Section 438 of the Energy Independence and Security Act (EISA) of 2007 and the District of Columbia Stormwater Management Guidelines, consisting of the 2013 District of Columbia Department of the Environment Rule on Stormwater Management and Soil Erosion and Sediment Control and the 2013 Stormwater Management Guidebook.

### **6.2. Groundwater**

Implementation of the Selected Action Alternative could result in encounters with groundwater, depending on the location of future construction and the design of the structure. U.S. Army Public Health Command reported the results of groundwater sampling from monitoring wells in the vicinity of the transformer vaults at the northwest corner of Building 40 and estimated the concentrations of PCBs (concentrations less than the reporting limit of 0.5 microgram per liter ( $\mu\text{g/L}$ )) in some samples. The estimated results may be false positives as they were not confirmed through use of a second column in a gas chromatograph. The need for further groundwater sampling will be determined by the DOS.

If groundwater is expected to be encountered during construction of buildings and related structures, the designs will address the management of groundwater in accordance with District of Columbia and federal laws and regulations.

### **6.3. Vegetation**

The Selected Action Alternative will impact vegetation by removing some existing trees, including Heritage and Special Trees. The impact to trees will be minimized by maintaining a 50-foot wide vegetative buffer along Alaska Avenue, Fern Street, and 16th Street. DOS will retain trees in fair to excellent condition, including Heritage and Special Trees, within the buffer zone and the public open space. Approximately 15 of the 84 Heritage Trees and 47 of the 226 Special Trees inventoried across the site were designated as poor

to very poor condition and will be removed. On the DOS-controlled portion of the site, if a poor to very poor Heritage or Special Tree is removed, replacement trees will be planted along streets and within the vegetative buffer to offset the loss at the ratio defined in the DDOT guidance. DOS will use a licensed arborist to identify necessary tree removals, protected trees, and to supervise new tree planting on the property. District statutes and Sustainable District of Columbia goals will be used as a general framework for tree management on the site.

#### **6.4. Traffic and Transportation Facilities**

The Selected Action Alternative was considered to have an impact at an intersection if the capacity analyses showed a Level of Service E or F at an intersection or along an approach with the proposed action, where one does not exist in the future conditions for the No Action Alternative. Based on these criteria, the following intersections will be impacted by the FMC development:

- 16th Street & Alaska Avenue
- 16th Street & Aspen Street
- 16th Street & Main Drive
- Georgia Avenue & Butternut Street
- Georgia Avenue & Dahlia Street
- Dahlia Street & Alaska Avenue

The Selected Action Alternative will increase travel by heavy vehicles. Service for trash, recycling, and deliveries will occur regularly. Overall, many of the heavy vehicle operations will occur with a standard single unit vehicle, but the Selected Action Alternative will need to account for access by larger articulated vehicles.

The Selected Action Alternative will add to pedestrian traffic in the study area. The Selected Action Alternative will have an impact on pedestrian crossings of Georgia Avenue and 16th Street. As the crash data shows there are a number of pedestrian crashes at intersections along Georgia Avenue and 16th Street, DOS will coordinate with the DDOT to consider adding Leading Pedestrian Intervals (LPIs) to the signalized intersections.

Under the Selected Action Alternative, through streets within the FMC will be able to accommodate buses should bus routes and/or stops be considered in the future by DDOT or WMATA. The Selected Action Alternative will increase use in both Metrorail and Metrobus.

The Selected Action Alternative will impact bicycle facilities by increasing demand for bicycle parking and storage, demand for Capital Bikeshare docks and facilities in or near the former WRAMC, and increased safety and visibility for cyclists.

#### **6.5. Current and Future Land Use**

The Selected Action Alternative will impact the 31.7 acres of land at the former WRAMC by converting vacant institutional land to active institutional land. The Selected Action Alternative will likely have a positive effect by making adjacent residential and commercial areas more desirable.

The Selected Action Alternative will have a positive effect on future land use by supporting planned redevelopment at the District of Columbia's Walter Reed Army Medical Center Local Redevelopment Authority (DC-LRA) portion of the former WRAMC, as described in the Small Area Plan. The FMC will be a large employment center adjacent to the DC-LRA development. Employees will likely patronize the

retail and food service businesses planned for the DC-LRA development, and some might choose to reside in the planned residential portion of the development.

The Selected Action Alternative will impact emergency response services, which will be responsible for providing emergency service to the FMC. The Selected Action Alternative will result in approximately 4.9 acres of new publicly available open space.

#### **6.6. Visual Resources and Aesthetics**

A visual change could occur for users of the Rock Creek Park Holly Trail, depending on specific lot development. The former WRAMC is visible from the Holly Trail across 16th Street, a four-lane arterial roadway. While the design guidelines for the site emphasize retaining the tree canopy and require a landscaped buffer along 16th Street, views of the former WRAMC from the trail could change, depending on the lot development on the site's southwest quadrant.

After the FMC is constructed, views of the site of the former WRAMC from surrounding areas will be similar to current views of institutional land. The Selected Action Alternative will be designed to retain historic campus character. Site development will be visually consistent with current and future adjacent land uses. Specific lot development characteristics will be dependent upon the lot's location.

#### **6.7. Cultural Resources**

The Selected Action Alternative proposes definitive actions that will result in adverse effects on historic properties, which are contributing elements to the WRAMC Historic District, as well as potential actions where the effect will be dependent on whether DOS finds foreign mission partners that are interested in renovating a historic resource for a new programmatic use.

The residential properties at the western portion of the site (Buildings 19, 21, 22, 25, 26, 29, 29A, 30, and 35) have been identified for removal. Buildings 40 and 41 will be offered to potential lessees with the objective that they will be renovated. Building 57/Memorial Chapel will be retained and repurposed with DOS retaining control of the building. The perimeter fence and gates will be retained, although some modifications may be required to accommodate current functional requirements.

Under the Selected Action Alternative, the "worst-case scenario" is that of the contributing resources within the FMC boundary, only Building 57 and the perimeter fence will be retained. The following evaluation is based on this scenario.

The Selected Action Alternative will have no direct adverse effect on Rock Creek Park. The Selected Action Alternative retains the configuration of the WRAMC at the western boundary along 16th Street adjacent to Rock Creek Park. The existing historic perimeter fence and gate will be retained and the boundary reinforced with a landscaped buffer along 16th Street and Alaska Avenue. Access to Rock Creek Park will not be restricted during construction or operation of the proposed FMC.

The Selected Action Alternative may have an indirect adverse effect on Rock Creek Park. The redevelopment of the FMC site by DOS (and the remainder of the WRAMC by other entities) will attract many new visitors to the property that may cross 16th Street NW to enter Rock Creek park. While Sherrill Drive, located directly across from Aspen Street, offers vehicular access to the park, it is narrow and not safe for use by pedestrians except on weekends and holidays when it is closed to vehicular traffic. The closest pedestrian trailhead access points to the Park are three blocks north (at Holly Street) and two blocks south (at Whittier Street). Lacking a safe entry point, some pedestrians may create unauthorized "social" trails through the woods which may lead to erosion and other damage to the park resources.

Implementation of the Selected Action Alternative will result in an adverse effect to the WRAMC Historic District. The integrity of a historic district is based on the setting, design, and association of the component parts. These are linked to the identifiable boundary, the arterial system within the campus, and the surviving resources constructed between 1909 and 1956.

The boundary and arterial system will be retained and reinforced as part of the proposed undertaking. The Selected Action Alternative will retain and reinforce the primary vehicular artery of Dahlia Street (east-west). The section of 14th Street north of Dahlia Street will be moved approximately 30 feet to the east, and 14th Street between Main Drive and Dahlia Street will be modified to incorporate a landscaped median element that will also serve as a bioswale. North of Dahlia Street, 14th Street will terminate in a cul-de-sac centered on Building 54. The Alaska Avenue gate will be closed to vehicles, although pedestrian and bicycle access will be maintained. While these are changes from the internal road system that existed in 1956, they are in keeping with the changes that occurred throughout the period of significance and are not considered an adverse effect to the historic district.

The majority of noncontributing structures within the FMC project boundary will be removed to provide lots for new construction. Noncontributing Buildings 20, 32, and 56 may be reused, depending on interest from foreign missions. The siting, massing, and general design approach to new construction will be guided both by the guidelines issued by the DC-HPO for new construction in a historic district and specific design guidelines that have been developed for the master plan.

Removal of the residential structures on the west portion of the campus will have both a direct adverse effect, the loss of contributing resources, and an indirect adverse effect on the overall historic district. Removal will eliminate the buildings' historic location, setting, design materials, workmanship, feeling, and association with other historic district buildings. These buildings were not purpose built for WRAMC; they were absorbed as the campus grew and utilized as Officers' Housing. There is limited visual connection between these buildings and the core of the historic district, Building 1 (the Main Hospital), but they do represent an aspect of the history and development of the WRAMC.

The potential loss of Buildings 40 and 41 will be both a direct adverse effect, the loss of contributing resources, and the direct adverse effect on the overall historic district. Removal will eliminate the buildings' historic location, setting, design materials, workmanship, feeling, and association with other buildings within the historic district. While the history of the development of the WRAMC campus was mostly organic, driven by needs during periods of international conflict, the one planned formal arrangement on the campus that has survived is the relationship between Buildings 1, 40, and 41. The landscaped open space that was formed by these three buildings has been lost with the insertion of new buildings, but the loss of Buildings 40 and 41 will adversely affect the reading of the campus plan as it was developed between the World Wars.

The Selected Action Alternative provides for the reuse of Building 57/Memorial Chapel, but may have an adverse effect on the resource. The programmatic use of the facility has not been finalized. Prior to reuse, modifications will be required to comply with building code, incorporate programmatic needs, and provide necessary support spaces (toilet rooms, kitchenette, etc.). These modifications could have an adverse effect on character-defining features. Removal or replacement of features could have an adverse effect on the materials and workmanship of the resource.

The Selected Action Alternative may result in an adverse effect to the perimeter fence. Under the 14th Street cul-de-sac option, the Selected Action Alternative retains the perimeter fence on 16th Street and Alaska Avenue within the project area boundary. Existing gates and gate posts at Main Drive (north side of the gate), Dahlia Street, and 14th Street will remain in their current locations. Under the 14th Street

through-street option, the perimeter fence on Alaska Avenue will be altered to align the intersection, resulting in an adverse impact.

The Selected Action Alternative will have no adverse effect on Main Drive. The Selected Action Alternative includes curb cuts to the northern edge of Main Drive for access to new construction. The configuration and detailing of the north side of Main Drive will not be changed.

### **6.8. Economic Activity**

The Selected Action Alternative will result in new employment both from the construction of the FMC and from operation of future chanceries. The jobs associated with the construction of the project are a one-time impact and do not represent an ongoing change to regional employment, while the jobs created from chancery operations represent a permanent impact to the regional economy. It is expected that the overwhelming majority of direct jobs will be filled by foreign nationals either relocated from current chancery facilities in Washington, DC or not previously residing in the country.

### **6.9. Security**

The WRAMC has been closed to the public since 2001. Under the Selected Action Alternative, public access will be maintained along all streets within the FMC except in limited instances where security justifies the need for temporary closures (such as national emergencies). DOS will define a process and establish thresholds for security-related street closures. Programmatic security planning will be developed. It is anticipated that security measures before, during, and after construction will be different and overlap in some cases. Security requirements for the individual chanceries will be developed by each chancery and coordinated with the multijurisdictional authorities, with the ICC used as a security model. The U.S. Secret Service Uniformed Division is responsible for security of foreign missions and security requirements will include Secret Service patrols of the area.

### **6.10. Petroleum Tanks and Hazardous Substances**

The Selected Action Alternative will represent a decrease in potential uncontrolled storage tank petroleum releases, as compared to when WRAMC was an operational Army Garrison, and no significant change from the current conditions.

The Selected Action Alternative will result in the removal of storage tanks and decommissioning of generators. If a building will be reused, the foreign mission will be responsible for removal and decommissioning. If a building is to be demolished, DOS will be responsible for removal and decommissioning. DOS will be responsible for removal of underground storage tank MP-30 that feeds a generator in Building 54. Through the design guidelines, DOS will ensure that all remediation is carried out in accordance with district and federal law.

The Selected Action Alternative will result in the removal of PCB-impacted soil and other materials. DOS may remediate beyond requirements to the unrestricted use concentration, depending on the planned use of the area. If a building will be reused, the foreign mission will be responsible for removal. If a building is to be demolished, DOS will be responsible for removal. Through the design guidelines, DOS will ensure that all remediation is carried out in accordance with District and federal law.

Based on information provided by the Department of the Army, asbestos is present in Buildings 19, 21, 22, 25, 26, 29, 30, 35, 40, 41, 55, 57, and T-2. The Selected Action Alternative will result in the removal and disposal of asbestos-containing material from buildings and steam tunnels in accordance with district and federal law.

Buildings 40, 41, 57, and T-2 are presumed to contain lead-based paint (LBP). The Selected Action Alternative will require building demolition to occur in accordance with LBP regulations. Buildings to be reused may require testing and remediation in accordance with the regulations.

Under the Selected Action Alternative, DOS will include contingencies in the design plans to prepare for the possibility of discovering a currently unknown disposal area. Disposal areas will be managed in accordance with District and federal laws and regulations. DOS will follow protocols in District and federal regulations related to informing the public of hazardous materials discovery.

### **6.11. Cumulative Effects**

The cumulative effect of past, present, and reasonably foreseeable future impacts to cultural resources consists of adverse effects to the WRAMC Historic District caused by land use changes. While the history of the Walter Reed campus is one of change and accommodation to meet new program requirements, the loss of 13 of the 14 contributing buildings within the boundary of the FMC under the Selected Action Alternative will further diminish the integrity of the historic district as an assembly of related structures. The infrastructure framework of the district, the perimeter fence, and the roadways, will remain but the visual continuity of the campus will be lost from outside looking in and more importantly from within the campus. Contributing historic resources on the CNMC and DC-LRA developments are planned for reuse. However, adaptation of these historic buildings for new purposes may contribute to a cumulative impact on the integrity of the WRAMC Historic District.

## **7. Environmentally Preferable Alternative**

Of the action alternatives evaluated in the DEIS, SDEIS, and FEIS, the Environmentally Preferable Alternative is the Selected Action Alternative (Alternative 7). I selected this alternative because it best meets the project's purpose and need while resulting in the least adverse environmental consequences.

In comparison to Alternative 7, Alternatives 1 through 6 would have resulted in a larger area of disturbance with greater impacts to vegetation, traffic, noise, cultural resources, economic resources, security, and hazardous materials.

## **8. Avoidance, Minimization and Mitigation Measures**

All practicable means of avoiding, minimizing, or mitigating adverse environmental consequences of the Selected Action Alternative were adopted and are described below.

The following avoidance, minimization, and mitigation measures will be implemented.

### **Vegetation**

Heritage Trees and their associated critical root-zone will be identified by DOS for each chancery lot. DOS will encourage foreign missions, through lot development guidelines and lease agreements, to protect, and if needed, replace Heritage and Special Trees in accordance with the intent of the Urban Forest Preservation Act. Requirements and guidelines for retaining the tree canopy on chancery parcels are included in the FMC design guidelines that are supplemental to the lease agreement between DOS and the respective chanceries.

Landscape guidelines for the DOS- and foreign mission-controlled portions of the site include the recommendation to use native or adapted species. The Selected Action Alternative master plan design guidelines require each street within the FMC to be lined with trees from the DDOT's Urban Forestry Administration recommended tree list. The trees will be located in tree boxes that will include bioretention elements in support of the stormwater management plan for DOS common areas.

### **Stormwater**

The Selected Action Alternative will not be allowed to increase the peak rate of stormwater runoff. The Selected Action Alternative will be required to reduce the developed peak flows to predevelopment conditions through detention, reuse, and low impact development. DOS-controlled infrastructure parcels (roadways and open spaces) will establish a pre-development hydrologic condition. DOS infrastructure upgrades will include stormwater management to return the post-developed hydrologic conditions to the pre-developed conditions through the use of several decentralized low impact development facilities, including bioretention and streetscape filtration inlets, as well as by reducing the impervious coverage to a minimum required.

The individual chancery parcels will be required to meet the DC Stormwater Management (DCSWM) requirements. Each parcel will have a review of stormwater management during their construction permitting phase to confirm adequate facilities have been implemented to reduce the post-developed runoff condition to the pre-developed condition for their parcel.

As individual parcels and common infrastructure will be required to meet the DCSWM requirements, the project as a whole will attain compliance with the District's requirements and EISA Section 438.

The DOS-controlled common areas to be developed will include stormwater management capable of meeting requirements independently. To accommodate the infrastructure improvements outside of individual lots (i.e., roads, walks, open space, etc.), detention/water quality improvement areas will be designated adjacent to roads. Roadway runoff will be collected at intervals along the gutter pan and directed to bioretention facilities (tree boxes) for cleaning and disposal. In addition to the linear roadway system, the linear park along 14th Street will replace the existing surface parking lot and provide an additional centralized area for the treatment of stormwater runoff. The open space along 14th Street is designed as a large landscaped green area and incorporates bioretention elements. The stormwater system for road infrastructure will connect to the District of Columbia system.

### **Cultural Resources**

The DOS will avoid adverse effects to Buildings 40, 41, and 57 by continuing to include the following measures in contracting instruments for its interim maintenance agreements:

- Maintain the integrity of the exterior building envelopes that existed as of November 2015.
- Provide fire protection using systems in place as of November 2015 that are operational.
- Prevent undue deterioration by: a) Maintaining air circulation and ventilation with operational ventilation systems in place as of November 2015; and b) Keeping interiors with operational climate control systems, at temperatures between 55 and 85 degrees Fahrenheit or within the capabilities of the existing climate control systems in place as of November 2015.
- Providing pest control.
- Conduct periodic exterior inspections at least monthly, looking for signs of loss of integrity by damage from weather, physical security breaches, or undue facility deterioration. A record of the inspections will be maintained on site by the contractor and included in the annual report required by Stipulation VII of the Programmatic Agreement (PA) (Appendix A).
- Should damage occur to character-defining features, to structural components, or to features that would interfere with compliance with subsections 1, 2, and 3 of the PA, the DOS will immediately notify the DC SHPO and, in consultation with the DC SHPO, determine whether enough integrity remains for the building to be considered contributing to the character of the historic district. If there is consensus that sufficient integrity remains, DOS, in consultation with the DC SHPO, will implement repairs to safeguard the contributing resource. If consensus is reached that the building

is no longer contributing, DOS will develop an acceptable mitigation plan in coordination with the DC SHPO.

The DOS, in consultation with the DC SHPO, will ensure adherence to the Treatment Standards in the removal of noncharacter-defining features from Buildings 40 and 41. Non-character-defining features may consist of, but are not limited to, artwork, plaques, memorials, building numbers, architectural lettering, time capsules, and architectural signage. The DOS will take precautions not to damage historic fabric and will repair surfaces to ensure preservation of historic materials.

To the extent consistent with DOS's treaty and international law obligations, DOS will maintain these buildings until lots similar in size, street frontage, and vehicular access within the FMC other than those containing Buildings 40 and 41 have been leased and other requirements of the PA directly related to Buildings 40 and 41 have been fulfilled.

In the event that a foreign government terminates, abandons or otherwise relinquishes a lease of Building 40 or 41 back to DOS after a chancery is established, DOS will avoid adverse effects to these buildings prior to the lease to another foreign government in accordance the stipulations in the PA. Subsequent leases will be executed in accordance with the terms of the PA.

DOS will actively promote and encourage foreign governments to lease Buildings 40 and 41 for chancery use by:

- Developing promotional materials that summarize the historic significance, architectural features and other desirable qualities of the buildings, and by posting these materials on the appropriate DOS website and providing copies to every foreign country that expresses an interest in establishing a chancery at the FMC.
- Pursuing appropriations to facilitate safe access to Building 40 for the purpose of touring potential tenants through the facility.
- Devising creative leasing strategies that provide incentives for adaptive use.
- Including the list of interior spaces identified in the Army's Findings Regarding Historic Properties Present Within the Area of Potential Effect for the Closure and Transfer of Property Out of Federal Control at Walter Reed Army Medical Center for Building 40 within the Design Guidelines within 45 calendar days of executed this PA.

DOS will include language in all lease agreements with foreign governments to manage unanticipated archaeological discoveries in accordance with federal law. The foreign governments will turn over to DOS all recovered artifacts (See Appendix A).

#### **Site Development Activities**

The DOS will follow the process developed and described within the PA for Section 106 consulting parties to be informed about and participate in the infrastructure and site plan design prior to submission to NCPC for review pursuant to The National Capital Planning Act (40 U.S.C. § 8722 (b)(1) and (d)) (see Appendix A).

Within one year of the execution of the PA, DOS will consult with the Environmental Protection Agency to determine whether the requirements of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") apply to Building 40 or 41 and will notify DC SHPO of the determination within 30 calendar days of receipt.

In the event that CERCLA environmental remediation is required for Building 40 or 41, the DOS will consult with the DC SHPO to identify and implement measures that to the extent practicable could avoid,

minimize or mitigate adverse effects on these contributing resources, and amendments to this Agreement as necessary, prior to undertaking environmental remediation activities.

Through the CERCLA process, the DOS will take or to the extent feasible ensure the lessee undertakes remediation actions necessary to assure protection of human health and the environment and, when possible, implement or ensure implementation of measures to avoid or minimize adverse effects on historic properties. The DOS may enter into a discussion with the DC SHPO regarding the removal of the wing known as 40C from Building 40. Starting with Fiscal Year 2020 and through Fiscal Year 2030, DOS will request funds for an environmental analysis to include, but is not limited to, remediation assessment and implementation, for Building 40 through its Budget Resource Request and Operating Plan, to facilitate access to the building. A summary of this yearly request, and the result, will be included in the annual report required by the PA.

### **Chancery Development Activities**

The DOS will follow the processes developed and described within the PA for Section 106 consulting parties to be informed about and participate in applications received for:

- 1) chancery development on empty lots
- 2) chancery development involving the adaptive reuse of Buildings 40 or 41
- 3) chancery development involving demolition of Buildings 40 or 41
- 4) post-chancery development
- 5) transfer of lease between foreign governments (see Appendix A).

DOS will continually consult with the foreign government on the applications for chancery development to ensure they comply with the Design Guidelines incorporated into the Master Plan for the FMC.

### **Section 106 Mitigation**

The PA lists the following mitigation measures resulting from the Section 106 process:

- The signed PA and the Design Guidelines will be appended to all lease agreements with foreign governments that are created after the finalization of the PA.
- Within one year of the execution of the PA, and in consultation with the DC SHPO, the DOS will initiate planning for a phased implementation of additional interpretive panels meeting the quality standards of the D.C. Heritage Trails program for portions of the FMC that will be accessible to the public. This work will be coordinated with the work that is being undertaken on the other areas of the WRAMC Historic District. DOS will fund the design, production and installation of interpretive materials within two years of completion of the infrastructure upgrades of the FMC.
- Within one year of the completion of the infrastructure and site development activities, DOS will distribute a copy of the final public access plan for Building 57/Memorial Chapel to Consulting Parties, except the ACHP, by email within 14 calendar days of finalizing the public access plan. This will be provided for information purposes only.

### **Transportation**

In support of the Selected Action Alternative, DOS will perform the following to increase transit usage:

- Coordinate with DDOT and the DC-LRA Reuse Plan team on future streetcar and other long-term transit improvements;
- During the development, review transit facilities along 16th Street and Alaska Avenue for potential improvements and consolidation;

- As part of the planning process between DDOT, WMATA, and the DC-LRA development team, provide assistance in the service modification for transit lines and streetcar servicing the streets interior to WRAMC; and
- In locations where available and appropriate, coordinate with WMATA to provide bus shelters, bus stops, and layover areas along the boundary of FMC and within and along the boundary of former WRAMC.

In support of the Selected Action Alternative, DOS will perform the following to improve pedestrian facilities:

- Improve pedestrian conditions along east-west and north-south pedestrian routes within the FMC. Recommended improvements include expanding sidewalk widths, removing obstructions, installing and upgrading crosswalks at intersections, and installing LPIs and traffic calming measures such as speed tables, decorative pavers, bulb outs at intersections, and the like. These will include improving pedestrian accessibility at the reopened gates and in the open space areas along 16th Street, Alaska Avenue, Fern Street, Georgia Avenue, and Aspen Street.
- Add east-west and north-south pedestrian connections through the FMC to provide better access and routing between the FMC and the surrounding neighborhood. New routing options and crossing locations will help disperse pedestrian traffic, which will mitigate the impact of increased pedestrian volumes to any one intersection or sidewalk segment. It will reduce the need to make significant changes to intersections that will attract additional pedestrian volumes warranting new traffic control devices or changes to intersection geometry.

In support of the Selected Action Alternative, DOS is committed to the following mitigation measures to improve bicycle facilities:

- Ensure roadways internal to the FMC accommodate bicycle travel;
- All shared-use trails will be designed to a minimum of 10 feet wide to accommodate bicycle and pedestrian activities;
- Recommend bicycle facilities be extended by the District of Columbia at the northern edge of the former WRAMC campus;
- Provide land, installation funding, and first year's operating expenses for a Capital Bikeshare station at the NE corner of the 14th Street and Dahlia Street intersection or other mutually acceptable location on the FMC campus;
- Provide installation funding and first year's operating expenses for a second Capital Bikeshare station at the Takoma Metrorail station or in the adjacent neighborhood; and
- Provide crosswalks and all-way stops at FMC entrances to ensure bicycle access.

DOS has committed to the following mitigation measures at intersections:

- Dahlia Street and Alaska Avenue - DOS will install a 100' westbound right turn lane at the Dahlia Street and Alaska Avenue intersection.
- 16th Street and Alaska Avenue - The District of Columbia and DOS will coordinate the retiming of the signal to ensure the most efficient operation in the future. Also, should the northbound right turn lane along 16th Street at Alaska Avenue that is planned for implementation as a part of the DC-LRA not be in place by the time the FMC is 50 percent built out, DOS will construct this improvement.
- 16th Street & Main Drive - The District of Columbia, the developer of the DC-LRA site, and DOS will coordinate to monitor the operation of the intersection to ensure the most efficient operation in

the future following the construction of the FMC. Also, should the westbound right-turn lane along Main Drive at 16th Street that is planned for implementation as a part of the DC-LRA not be in place by the time the FMC is 50 percent built out, DOS will construct this improvement.

- 16th Street & Aspen Street/Sherrill Drive - DOS will coordinate with DDOT on signal timings to ensure the most efficient operation in the future following the development of the FMC. To mitigate this impact, DOS will encourage a reduction in auto mode travel by funding the installation and first year's operation expenses of a new 19-dock Capital Bikeshare station on the FMC property. DOS will also fund the installation and first year's operating expenses for a second Capital Bikeshare station at the Takoma Metrorail station or in the adjacent neighborhood.
- Georgia Avenue & Aspen Street - The District of Columbia, the developer of the DC-LRA site, and DOS will coordinate to ensure that signal timing changes that occur during the DC-LRA Reuse Plan be done in a way that will improve conditions when the FMC is complete. No additional signal timing changes will be expected as part of the FMC.
- 14<sup>th</sup> Street and Alaska Avenue – Designated greenspace and a required setback will extend for the entire right of way of 14<sup>th</sup> Street up to Alaska Avenue. These design elements will ensure that this pedestrian/bicycle only intersection remain clear of future buildings.

### **Construction Activities**

Each individual parcel will be required to address construction Best Management Practices and follow procedures established in the design guidelines. In addition, when a building demolition occurs on the FMC, the DOS will hire a pest control contractor. DOS will coordinate with the developers for the land owned by Children's National Medical Center and the Parks at Walter Reed; if they demolish buildings or start major construction that will impact pests, DOS will hire a pest control contractor to deal with pests on the FMC property.

## **9. Monitoring and Enforcement**

The FMC will be designed and constructed in accordance with the design guidelines found within the FMC Master Plan. DOS personnel will be periodically present on site during construction to monitor adherence to the design guidelines. Design review of the individual site developments by foreign missions will be undertaken by NCPC utilizing the process established by the FMA.

DOS and NCPC signed a Memorandum of Agreement (MOA) on February 27, 2017 pursuant to 40 U.S.C. § 8722 and the FMA (22 U.S.C. 4302), defining the review process for new chanceries at the FMC. The MOA states that NCPC will undertake the sole review of applications for the location, replacement, or expansion of chanceries at the FMC. The parameters for NCPC's review will be those established by the FMA, including, without limitation 22 U.S.C. § 4306(b)(2); 22 U.S.C. § 4306(c)(2)-(3); 22 U.S.C. § 4306(d)(1)-(6); and 22 U.S.C. § 4306(f). The process will include public participation by those members of the public who express an interest, but only comments addressed to the requirements of the FMA at 22 U.S.C. § 4306(d)(1)-(6) will be considered.

## **10. Signature**

\_\_\_\_\_

Date: \_\_\_\_\_

Keith Hanigan, Deputy Assistant Secretary for the Bureau of Administration  
Office of Operations  
U.S. Department of State



## Appendix A

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# ***Programmatic Agreement***

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**Programmatic Agreement  
Among the  
Department of State,  
the District of Columbia State Historic Preservation Office,  
the National Capital Planning Commission, and  
the Advisory Council on Historic Preservation  
Regarding the Development, Implementation, and Maintenance of a  
Foreign Missions Center  
Within the Walter Reed Army Medical Center Historic District  
Washington, District of Columbia**

**WHEREAS**, the Foreign Missions Act of 1982 (22 U.S.C. 4301-4316 as amended) (“FMA”) establishes that the operation in the United States (“US”) of foreign missions and public international organizations and the official missions to such organizations, including the permissible scope of their activities is a proper subject for the exercise of federal jurisdiction; and

**WHEREAS**, in furtherance of the FMA, the head of any federal agency may transfer or loan any property to, and perform administrative and technical support functions and services for the operations of the Department of State (“DOS”); and

**WHEREAS**, the FMA permits the Secretary of State to acquire property in the US for the purpose of implementing reciprocal exchanges of property intended for diplomatic or consular uses between the Government of the US and the government of a foreign country; and

**WHEREAS**, a foreign mission is any mission to or agency or entity in the US which is involved in the diplomatic, consular or other activities of, or which is substantially owned or effectively controlled by a foreign government, or an organization representing a territory or political entity which has been granted diplomatic or other official privileges and immunities under the laws of the US or which engages in some aspect of the conduct of international affairs of such territory or political entity, including any real property of such a mission and including the personnel of such a mission; and

**WHEREAS**, the term “chancery” in this context means the principal offices of a foreign mission (as defined in the FMA) used for diplomatic or related purposes, and any annexes to these offices or support facilities, and includes the site and any buildings on the site; and

**WHEREAS**, on November 6, 2015 the DOS accepted the transfer of 31.7 acres of land of the former Walter Reed Army Medical Center (“WRAMC”) from the Department of the Army (“Army”); and

**WHEREAS**, after administrative jurisdiction for the site was transferred from the Army to the DOS, the DOS Office of Foreign Missions (“OFM”) in coordination with DOS

Office of Facilities Management Services (“A/OPR/FMS”) hired a contractor to oversee site maintenance, including but not limited to operations, waste removal, recycling, landscape maintenance and snow removal; and

**WHEREAS**, the DOS proposes the establishment of a Foreign Missions Center (“FMC”) on approximately 31.7 acres of the former WRAMC at 16th Street NW, Washington, District of Columbia (“District”), between Main Drive and Fern Street, in order to manage the FMC, including maintaining common areas, developing a Master Plan, developing design guidelines, and leasing land to foreign governments for the purpose of constructing and operating new chancery facilities (“Project”); and

**WHEREAS**, the DOS will carry out the infrastructure work and will lease lots to foreign missions for their development and long-term use as chanceries, therefore, this Project constitutes an undertaking subject to review under Section 106 of the National Historic Preservation Act (“NHPA”), 54 U.S.C. § 300101 et seq., and its implementing regulations, 36 CFR Part 800; and

**WHEREAS**, the DOS has defined the Area of Potential Effect (“APE”) of this undertaking for the aboveground historic resources as comprised of the entire former WRAMC plus an area extending approximately 1,250 feet (four city blocks) to the north and west of the FMC (as depicted in the map shown in Appendix 1); and

**WHEREAS**, pursuant to 36 CFR § 800.5(a)(2)(vii), the transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance would constitute an adverse effect; and

**WHEREAS**, the DOS has determined that the undertaking will have an adverse effect on identified historic properties (Appendix 2), which are contributing elements to the WRAMC Historic District, and has consulted with the District of Columbia Historic Preservation Office (“DC SHPO”) which functions as the State Historic Preservation Office for the District, pursuant to 36 CFR Part 800; and

**WHEREAS**, in accordance with 36 CFR § 800.6(a)(1), the DOS has notified the Advisory Council on Historic Preservation (“ACHP”) of its adverse effect determination, providing the specified documentation, and the ACHP has chosen to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

**WHEREAS**, interested members of the public have been provided opportunities to comment on identification of historic properties through public meetings and information provided on the internet and the opportunity to comment on the effects this undertaking will have on historic properties at WRAMC; and

**WHEREAS**, the DOS did not identify any federally recognized Indian tribes that attach religious and cultural significance to historic properties within the APE; and

**WHEREAS**, the DOS, in consultation with the DC SHPO, has invited Advisory Neighborhood Commission 4A, Advisory Neighborhood Commission 4B, the District Administrator’s Office, the Alliance to Preserve the Civil War Defenses of Washington, the Brightwood Community Association, the Committee of 100 on the Federal City, the D.C. Office of the Deputy Mayor for Planning and Economic Development, the D.C. Preservation League, the D.C. Office of Planning, the National Park Service - Rock Creek Park, the National Trust for Historic Preservation, the Shepherd Park Citizens Association, the U.S. Commission of Fine Arts (“CFA”), the Ward 4 District Council Member, and the Walter Reed Society to be consulting parties in this PA; and

**WHEREAS**, the National Capital Planning Commission (“NCPC”) is the body charged under The National Capital Planning Act (40 U.S.C. at § 8722) with the review of the Master Plan and any amendments to it; and

**WHEREAS**, the DOS and the NCPC have entered into a Memorandum of Agreement (“DOS/NCPC MOA”) dated February 27, 2017, attached as Appendix 3, acknowledging that NCPC has the responsibility of reviewing applications for the location, replacement, and expansion of chanceries at the FMC and outlines NCPC’s review process from a planning and zoning perspective and pursuant to the FMA; and

**WHEREAS**, NCPC will either disapprove or not disapprove applications for the location, replacement, and expansion of chanceries at the FMC in accordance with the DOS/NCPC MOA; and

**WHEREAS**, NCPC will review the Master Plan for the FMC, and any amendments to it, pursuant to The National Capital Planning Act (40 U.S.C. § 8722(a) and (b)(1)), however since these master plan reviews are advisory only, they do not meet the definition of an undertaking with the potential to affect historic properties as cited at 36 CFR § 800.16 (y); and

**WHEREAS**, NCPC has approval authority for certain Infrastructure and Site Improvements within the FMC; and these approvals are part of this Project subject to review under Section 106 of the NHPA; and

**WHEREAS**, the DOS has developed Design Guidelines with input from the NCPC, the CFA, and the DC SHPO, that will be utilized for both the Infrastructure and Site Improvement activities and Chancery Development activities; and

**WHEREAS**, NCPC is a Signatory to this agreement; and

**WHEREAS**, in accordance with 36 CFR § 800.14(b)(3), DOS, NCPC, ACHP and DC SHPO have elected to enter into this Programmatic Agreement (“PA”); and

**WHEREAS**, the Army submitted an *Application for Historic Landmark or Historic District Designation* concurrently with a National Register of Historic Places (“NRHP”) nomination for the WRAMC Historic District to the District of Columbia Historic Preservation Review Board, which serves as the State Review Board for the District, and this application was approved on April 24, 2014 placing the WRAMC Historic District on the District of Columbia Inventory of Historic Sites, and subsequently listed in the NRHP; and

**WHEREAS**, the NRHP nomination for the WRAMC Historic District identifies Building 40 (the Army Medical School/Army Institute for Research Building), Building 41 (the Red Cross Building), and Building 57 (the Memorial Chapel/Post Chapel) as “among the most prominent buildings from the 1920s and 1930s” within WRAMC; and

**WHEREAS**, the Army completed the *Army Findings Regarding Historic Properties Present Within the Area of Potential Effect for the Closure and Transfer of Property Out of Federal Control at Walter Reed Army Medical Center* in November 2011 which identified interior spaces as significant within Building 40 and Building 57; and

**WHEREAS**, the Army completed an existing conditions report based upon the architectural inventory of historic properties present at the former WRAMC, and took photographs of each principal façade of each eligible building and select copies (floor plans, facades, roof plans, details of character-defining features) of as-built drawings for each historic building which were provided to DOS upon transfer in November 2015; and

**WHEREAS**, the DOS has completed both an Existing Conditions Report and a Market Analysis for potential reuse of all existing buildings within the proposed boundary of the FMC, and these studies have determined that reuse of Buildings 40 and 41 is economically and programmatically feasible; and

**WHEREAS**, access to Building 40 is currently limited due to concerns of human health and safety, however the building’s envelope is secure; and

**WHEREAS**, Building 40 is identified to have four distinct sections (see Appendix 4) known as 40, 40A, 40B, and 40C; 40, 40A, and 40B being constructed during the period of significance for the WRAMC Historic District; and

**WHEREAS**, the DOS Existing Conditions Report and a Market Analysis has determined that reuse of Buildings 19, 21, 22, 25, 26, 29, 29A, 30 and 35 (the former Officers’ Quarters) as chanceries is not economically and programmatically feasible and that demolition of these buildings will be pursued; and

**WHEREAS**, demolition of the former Officer’s Quarters, contributing resources to the WRAMC Historic District, will result in an adverse effect; and

**WHEREAS**, the DOS has developed a Master Plan for the FMC which delineates three potential options for parcelization of the site to ensure flexibility in marketing different parcel sizes with a variety of street frontage types to accommodate the needs of the foreign mission community, with lots ranging in size from 0.76 acres to 4.87 acres, with the lots that currently contain Buildings 40 and 41 sized at 4.10 and 1.63 acres respectively (see Appendix 5); and

**WHEREAS**, the construction of new infrastructure, construction of new chanceries and their appurtenances, and potential reuse of existing buildings will have adverse visual or other effects upon the WRAMC Historic District and the Rock Creek Park Historic District, and these adverse effects are intended to be minimized through the development of a Master Plan for the FMC and Design Guidelines that address the unique conditions of the WRAMC Historic District; and

**WHEREAS**, the DOS shall retain permanent control of, and responsibility for the ongoing maintenance and long-term preservation of Building 57 in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties ("Treatment Standards"), and ensure that the building will not be leased to a foreign government, but will be open to the public on a regular basis in coordination with DOS after necessary improvements have been made to the building and the site by DOS; and

**WHEREAS**, the NRHP nomination for the WRAMC Historic District identifies the sections of the WRAMC perimeter fence bounding the west and northwest sides of the FMC as a structure contributing to the character of the WRAMC Historic District and the Master Plan calls for the retention of the fence; and

**WHEREAS**, the perimeter fence stands in the 16<sup>th</sup> Street NW and Alaska Avenue NW rights-of-way and is subject to District permits for work in public space, alterations to the fence, or other work in the public space that requires District permits, to the extent such reviews are legally required on federally owned properties, shall be subject to historic preservation review under the District's preservation law; and

**WHEREAS**, the Army completed a Phase IA Archaeological Assessment - Archival Investigation ("Archival Investigation") on the entire former WRAMC to determine what past land disturbance activities had been conducted there that could affect the preservation of archaeological remains, and collected and analyzed oral and documentary history sources describing locations where prehistoric or Civil War-related artifacts have been previously found at WRAMC utilizing Army and non-Army records; and

**WHEREAS**, the DOS has completed a Phase IA Geo-archaeology Survey to complete the Archival Investigation for the FMC including subsurface inspection of the project area in order to characterize the potential for archaeological resources that would need to be considered during the evaluation of proposed project effects, and intact soils with the potential to contain cultural material in the upper profile were identified throughout the

NW quadrant and the central portion of the SW quadrant of the 31.7 acres transferred to the DOS; and

**WHEREAS**, the DOS has completed a Phase IB Archaeological Study in undisturbed NW and SW quadrants of the 31.7 acres transferred to the DOS where construction or other surface disturbance will or may take place, and one archaeological site and two isolated finds were identified with all recovered artifacts properly documented and recorded, with a summary finding that additional archaeological excavation appears unlikely to add important new information about the battle of Fort Stevens, the Civil War more generally, or the history of the District, and that no further archaeological investigations are required; and

**WHEREAS**, all resulting artifact collections, images, field notes, records, digital data, and geospatial data generated by the archaeological investigations undertaken by the DOS shall be curated in accordance with 36 CFR Part 79; and

**WHEREAS**, the DOS has performed a comprehensive survey of the existing trees within the boundaries of the FMC, and through the survey have identified all “special” and “heritage” trees as defined by the Urban Forestry Division of the District Department of Transportation; and

**NOW, THEREFORE**, the DOS, the DC SHPO, the NCPC, and the ACHP agree the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking on historic properties.

### **Stipulations**

Within their respective authorities, the DOS and NCPC shall ensure the following measures are carried out:

#### **I. SITE MANAGEMENT ACTIVITIES**

- A. The DOS shall avoid adverse effects to Buildings 40, 41, and 57 upon execution of this PA by continuing to include the following measures in contracting instruments for its interim maintenance agreements:
  - 1. Maintain the integrity of the exterior building envelopes that existed as of November 2015.
  - 2. Provide fire protection utilizing systems in place as of November 2015 that are operational.
  - 3. Prevent undue deterioration by:

- a) Maintaining air circulation and ventilation with operational ventilation systems in place as of November 2015; and
  - b) Keeping interiors with operational climate control systems, at temperatures between 55 and 85 degrees Fahrenheit or within the capabilities of the existing climate control systems in place as of November 2015.
4. Providing pest control as needed.
  5. Conduct periodic exterior inspections at least monthly, looking for signs of loss of integrity by damage from weather, physical security breaches, or undue facility deterioration. A record of the inspections shall be maintained on site by the contractor and included in the annual report required by Stipulation VII.
  6. Should damage occur to character-defining features, to structural components, or to features that would interfere with compliance with subsections 1, 2, and 3 above, the DOS shall immediately notify the DC SHPO and, in consultation with the DC SHPO, determine whether enough integrity remains for the building to be considered contributing to the character of the historic district. If there is consensus that sufficient integrity remains, DOS, in consultation with the DC SHPO, shall implement repairs to safeguard the contributing resource. If consensus is reached that the building is no longer contributing, DOS shall develop an acceptable mitigation plan in coordination with the DC SHPO.

B. Removal of Non-Character-Defining Features

1. The DOS, in consultation with the DC SHPO, shall ensure adherence to the Treatment Standards in the removal of non-character-defining features from Buildings 40 and 41.
2. The DOS shall take all precautions not to damage historic fabric and shall repair surfaces to ensure preservation of historic materials.
3. Non-character-defining features may consist of, but are not limited to, artwork, plaques, memorials, building numbers, architectural lettering, time capsules, and architectural signage.

C. Maintaining Buildings 40 and 41

1. To the extent consistent with DOS's treaty and international law obligations, DOS shall maintain these buildings until all lots similar in size, street frontage, and vehicular access within the FMC other than those containing Buildings 40 and 41 have been leased and all other requirements of this PA directly related to Buildings 40 and 41 have been fulfilled.

D. Caretaker Status for Chanceries

1. In the event that a foreign government terminates, abandons or otherwise relinquishes a lease of Building 40 or 41 back to DOS after a chancery is established, DOS shall avoid adverse effects to these buildings prior to the lease to another foreign government in accordance with Stipulation I(A).
2. Subsequent leases executed during the duration of this PA shall be executed in accordance with the terms of this PA.

E. Environmental Remediation

1. Within one year of the execution of this PA, DOS shall consult with the Environmental Protection Agency to determine whether the requirements of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") apply to Building 40 or 41 and shall notify DC SHPO of the determination within 30 calendar days of receipt.
2. In the event that CERCLA environmental remediation is required for Building 40 or 41, the DOS shall consult with the DC SHPO to identify and implement measures that to the extent practicable could avoid, minimize or mitigate adverse effects on these contributing resources, and amendments to this Agreement as necessary, prior to undertaking any environmental remediation activities.
3. Through the CERCLA process, the DOS shall take or to the extent feasible ensure the lessee undertakes remediation actions necessary to assure protection of human health and the environment and, when possible, implement or ensure implementation of measures to avoid or minimize adverse effects on historic properties.
4. The DOS may enter into a discussion with the DC SHPO regarding the removal of the wing known as 40C (as illustrated in Appendix 4) from Building 40.

5. Starting with Fiscal Year 2020 and through Fiscal Year 2030, DOS will request funds for an environmental analysis to include, but is not limited to, remediation assessment and implementation, for Building 40 through its Budget Resource Request and Operating Plan, in order to facilitate access to the building. A summary of this yearly request, and the result, shall be included in the annual report required by Stipulation VII.

## **II. INFRASTRUCTURE AND SITE DEVELOPMENT ACTIVITIES**

- A. DOS shall provide the Consulting Parties, except the ACHP, notice by email, and by phone if necessary, to determine the Consulting Parties' interests in participating (hereafter referred to as Interested Parties) in the development of the infrastructure and site plan design prior to submitting it to NCPC. No response within 14 calendar days shall be understood to mean that the party is not interested in participating in the development of the design and they will not receive any additional information concerning the infrastructure and site plan design.
  1. DOS shall provide the Interested Parties a review package of the infrastructure and site plan design by email, and hard copy if requested, at the "Concept" level and 65-percent complete level;
  2. DOS shall provide the Interested Parties a 30-calendar day opportunity to review and comment by email on the design;
  3. DOS shall consider all comments received within the 30-calendar day review period in developing the design; and
  4. No response by an Interested Party within 30 calendar days shall be understood to mean that the Interested Party does not have any concerns or comments on the design.
- B. DOS shall submit the following to NCPC for its review pursuant to The National Capital Planning Act (40 U.S.C. § 8722 (b)(1) and (d)) as appropriate:
  1. Preliminary Design Submissions to NCPC: DOS shall submit the Preliminary Design to NCPC, along with a summary of comments made through Stipulation II(A), for its review pursuant to the agency's independent jurisdiction over the Project.

2. Final Design Submissions to NCPC: DOS shall submit the Final Design to NCPC, along with a summary of comments made through Stipulation II(A), for its review pursuant to the agency's independent jurisdiction over the Project.
  3. NCPC may elect to combine Preliminary and Final Design Submissions into one review by the Commission.
- C. DOS shall distribute a copy of the final (100-percent complete level) infrastructure and site plan design to the Interested Parties by mail within 14 calendar days of finalizing for information purposes only.

### **III. PRESERVATION ADVOCACY**

- A. DOS shall actively promote and encourage foreign governments to lease Buildings 40 and 41 for chancery use by:
1. Developing promotional materials that summarize the historic significance, architectural features and other desirable qualities of the buildings, and by posting these materials on the appropriate DOS website and providing copies to every foreign country that expresses an interest in establishing a chancery at the FMC.
  2. Pursuing appropriations to facilitate safe access to Building 40 for the purpose of touring potential tenants through the facility.
  3. Devising creative leasing strategies that provide incentives for adaptive use.
  4. Include the list of interior spaces identified in the Army's *Findings Regarding Historic Properties Present Within the Area of Potential Effect for the Closure and Transfer of Property Out of Federal Control at Walter Reed Army Medical Center* for Building 40 within the Design Guidelines within 45 calendar days of executed this PA.
- B. DOS shall include language in all lease agreements with foreign governments to manage unanticipated archaeological discoveries in accordance with federal law. The foreign governments shall turn over to DOS all recovered artifacts.

#### IV. CHANCERY DEVELOPMENT ACTIVITIES

- A. Application for Chancery Development on Empty Lots (see Appendix 6 for an illustration of timeframes)
1. Within 14 calendar days of receiving notice from a foreign government on the development of an application for chancery development, and in the spirit of Stipulation C(1)(a) of the DOS/NCPC MOA, DOS shall provide the Consulting Parties, except the ACHP, notice by email, and by phone if necessary, to determine the Consulting Parties' interests in participating (hereafter referred to as Interested Parties) in the subject application for chancery development. No response within 14 calendar days shall be understood to mean that the party, except for the NCPC, is not interested in the application for chancery development and the party will not receive any additional information concerning the subject application.
  2. DOS shall continually consult with the foreign government on the application for chancery development to ensure it complies with the Design Guidelines incorporated into the Master Plan for the FMC.
  3. DOS shall work with NCPC in accordance with Stipulation C(1)(c) of the DOS/NCPC MOA to determine the design review stage (e.g., concept, preliminary, final or combined preliminary and final) and a timetable of the review process within 30-calendar days of DOS receiving notice from a foreign government on an application for chancery application.
  4. Within 14-calendar days of determining the design review stage with NCPC, DOS shall notify by email the Interested Parties on the outline of the agreed upon design review stage for the subject application for chancery development.
  5. DOS shall provide the Interested Parties the project design by email, and hard copy if requested, within 30-calendar days of receipt of the project design from the foreign government:
    - a) DOS shall provide the Interested Parties a 15-calendar day opportunity to review and comment by email on the project design;
-

- b) DOS shall consider those comments addressed to the requirements of the FMA and the six review criteria received within the 15-calendar day review period and provide them to the foreign government;
    - c) No response by an Interested Party within 15 calendar days shall be understood to mean that the Interested Party does not have any concerns or comments on the design review stage.
  - 6. DOS shall notify Interested Parties by email, within 5 calendar days of submitting a formal application for chancery development to NCPC and, if determined, include on which Commission meeting agenda it will be scheduled.
  - 7. Interested parties may participate in the NCPC meeting, as referenced by Stipulation C(2)(e) of the DOS/NCPC MOA. If Interested Parties want to speak at the NCPC meeting, they may sign up prior to or at the meeting.
    - a) Interested Parties are encouraged to provide written or verbal comments to NCPC; however, NCPC shall only consider those comments that address the requirements of the FMA and the six review criteria set forth in Stipulation C(2)(f)(i)(1) – (6) of the DOS/NCPC MOA.
    - b) NCPC shall provide a concurrent notification to the DC SHPO when it sends notification to the District Office of Planning in accordance with Stipulation C(2)(c) of the DOS/NCPC MOA and NCPC shall only consider those comments addressed to the requirements of the FMA and the six review criteria set forth in Stipulation C(2)(f)(i)(1) – (6) of the DOS/NCPC MOA.
  - 8. DOS shall notify Interested Parties of NCPC’s final decision to “not disapprove” or “disapprove” an application for chancery development, within 14-calendar days of the NCPC decision.
- B. Application for Chancery Development involving Adaptive Use of Buildings 40 or 41 (see Appendix 7 for an illustration of timeframes)

1. Modifications to these properties required to update the buildings for adaptive use as a chancery will be evaluated under the Design Guidelines which have been created as part of the Master Plan and in consultation with DC SHPO.
2. Prior to officially submitting a formal application for a chancery development as outlined below, DOS shall notify DC SHPO of the potential project and offer DC SHPO 30 calendar days to review, discuss, and comment on the design options under consideration for the property.
3. Within 14 calendar days of receiving notice from a foreign government on the development of an application for chancery development, and in the spirit of Stipulation C(1)(a) of the DOS/NCPC MOA, DOS shall provide the Consulting Parties, except the ACHP, notice by email, and phone if necessary, to determine the Consulting Parties' interests in participating (hereafter referred to as Interested Parties) in the subject application for chancery development. No response within 14 calendar days shall be understood to mean that the party, except for the NCPC, is not interested in the application for chancery development and they will not receive any additional information concerning the subject application.
4. DOS shall work with NCPC in accordance with Stipulation C(1)(c) of the DOS/NCPC MOA to determine the design review stage (e.g., concept, preliminary, final or combined preliminary and final) and a timetable of the review process within 30 calendar days of DOS receiving notice from a foreign government on an application for chancery development.
5. Within 14 calendar days of determining the design review stage with NCPC, DOS shall notify the Interested Parties by email of the outline of the agreed upon design review stage for the subject application for chancery development.
6. DOS shall provide the Interested Parties the project design by email, and hard copy if requested, within 30 calendar days of receipt of the project design from the foreign government:
  - a) DOS shall provide the Interested Parties a 15-calendar day opportunity to review and comment by email on the project design;

- b) DOS shall consider those comments addressed to the requirements of the FMA and the six review criteria received within the 15-calendar day review period and provide them to the foreign government;
  - c) No response by an Interested Party within 15 calendar days shall be understood to mean that the Interested Party does not have any concerns or comments on the project design.
- 7. DOS shall notify Interested Parties by email within 5 calendar days of submitting a formal application for chancery development to NCPC and, if determined, shall include the scheduled date of the Commission meeting at which it is scheduled.
- 8. Interested parties may participate in the NCPC meeting, as referenced by Stipulation C(2)(e) of the DOS/NCPC MOA. If Interested Parties want to speak at the NCPC meeting, they may sign up prior to or at the meeting.
  - a) Interested Parties are encouraged to provide written or verbal comments to NCPC; however, NCPC shall only consider those comments that address the requirements of the FMA and the six review criteria set forth in Stipulation C(2)(f)(i)(1) – (6) of the DOS/NCPC MOA.
  - b) NCPC shall provide a concurrent notification to the DC SHPO when it sends notification to the District Office of Planning in accordance with Stipulation C(2)(c) of the DOS/NCPC MOA and NCPC shall only consider those comments addressed to the requirements of the FMA and the six review criteria set forth in Stipulation C(2)(f)(i)(1) – (6) of the DOS/NCPC MOA.
- 9. DOS shall notify Interested Parties of NCPC’s final decision to “not disapprove” or “disapprove” an application for chancery development, within 14 calendar days of the NCPC decision.
- C. Chancery Development involving Demolition of Buildings 40 or 41
  - 1. Pursuant to Stipulation I(C), DOS shall not consider any proposal to demolish Buildings 40 or 41 until all other lots similar in size, street frontage, and vehicular access within the FMC have been leased.

2. DOS shall notify DC SHPO, NCPC, ACHP, and the Consulting Parties in writing of the request of a foreign government to demolish Buildings 40 or 41. Such notification shall meet the following information requirements:
    - a) Summary of actions taken by DOS in regard to Stipulation III;
    - b) Any other actions taken by DOS to discuss with the foreign government to consider alternatives for the reuse of Buildings 40 or 41;
    - c) The goals of the foreign government for its chancery and why Buildings 40 or 41 cannot be reused to meet those goals; and
    - d) Requesting ideas on how Buildings 40 or 41 could be reused to meet the goals of the foreign government's chancery.
  3. DC SHPO, NCPC, ACHP, and the Consulting Parties have 60 calendar days upon receipt of this notice to respond in writing to DOS.
  4. DOS, DC SHPO, NCPC, ACHP, and the Consulting Parties have 180 calendar days (or another time period agreed to by all Signatories) upon notification of the proposed demolition per Stipulation IV(C)(2), to consult regarding the demolition or reuse of Buildings 40 and 41 and identify mitigation measures.
    - a) Any party may request a meeting to discuss these issues at any time during this period of consultation.
    - b) DOS shall provide a summary of the consultation that takes into account comments received and how the consultation concluded, and the process will proceed in accordance with Stipulation IV(A).
    - c) The PA may be amended to take into account mitigation measures in accordance with Stipulation X.
- D. Post-Chancery Development (when a foreign government wants to change its chancery after initial approval)

1. For any changes that substantially affect the exterior or site of Buildings 40 or 41, the foreign government shall comply with Stipulation IV(B).
  2. New construction chanceries shall comply with Stipulation IV(A).
- E. Transfer of Lease Between Foreign Governments
1. Leases of Buildings 40 or 41 sold or transferred by one government to another shall transfer all stipulations and responsibilities pertaining to the maintenance or future modifications.

## **V. MITIGATION MEASURES**

- A. The signed PA and the Design Guidelines will be appended to all lease agreements with foreign governments that are created after the finalization of the PA.
- B. Within one year of the execution of this PA, and in consultation with the DC SHPO, the DOS shall initiate planning for a phased implementation of additional interpretive panels meeting the quality standards of the D.C. Heritage Trails program for portions of the FMC that will be accessible to the public. This work shall be coordinated with the work that is being undertaken on the other areas of the WRAMC Historic District. DOS shall fund the design, production and installation of all interpretive materials within two years of completion of the infrastructure upgrades of the FMC.
- C. Within one year of the completion of the infrastructure and site development activities, DOS shall distribute a copy of the final public access plan for Building 57 to Consulting Parties, except the ACHP, by email within 14 calendar days of finalizing. This shall be provided for information purposes only.

## **VI. POST REVIEW CHANGES TO DOCUMENTS**

- A. Master Plan
1. If DOS proposes an amendment to the Master Plan that materially affects the WRAMC Historic District at any time, DOS shall initiate consultation by providing documentation relevant to any such proposed amendment to all Consulting Parties for their review. Such documentation of a proposed amendment shall meet the following information requirements:

- a) Detailed description of the proposed change;
  - b) Explanation of the justification for the change;
  - c) Analysis of potential effects on historic properties;
  - d) Description of consultation with other governmental authorities and interested parties, and copies of formal responses, if any; and
  - e) Analysis of alternatives.
2. Consulting parties shall have 45 calendar days to review the proposed amendment to determine whether it may alter, directly or indirectly, any of the characteristics of a historic property in a manner that would diminish integrity and to provide comments in writing to DOS.
  3. DOS shall review and take into account written comments prior to submitting the amendment to NCPC for review.
  4. NCPC shall review any amendment to the Master Plan in accordance with The National Capital Planning Act (40 U.S.C. § 8722(a) and (b)(1)) and provide its advisory comments to DOS.
    - a) Consulting Parties are encouraged to provide written or verbal comments to NCPC using its established participation process.
  5. DOS shall provide copies of the amendment within 45 calendar days after approval to all Consulting Parties.

B. Design Guidelines

1. If DOS proposes a material amendment to the Design Guidelines, DOS shall provide the Consulting Parties, except the ACHP, notice by email, and phone if necessary, to determine the Consulting Parties' interests in participating (hereafter referred to as Interested Parties). No response within 14 calendar days shall be understood to mean that the party is not interested in the revision of the Design Guidelines and they will not receive any additional information concerning the subject application. Such documentation of a proposed amendment shall meet the following information requirements:

- a) Detailed description of the proposed change;
  - b) Explanation of the justification for the change;
  - c) Analysis of potential effects on identified historic properties;
  - d) Description of consultation with other governmental authorities and interested parties, and copies of formal responses, if any; and
  - e) Analysis of alternatives.
2. Interested Parties shall have 45 calendar days upon receipt to review the proposed amendment to determine whether it may alter, directly or indirectly, any of the characteristics of a contributing resource in a manner that would diminish integrity of the WRAMC Historic District and to provide comments in writing to DOS.
  3. DOS shall review and take into account written comments prior to its response to any Design Guideline amendment. DOS shall provide copies of the revised Design Guidelines within 45 calendar days after approval to all Consulting Parties.

## **VII. POST REVIEW DISCOVERIES**

- A. Non-Native Human Remains and Native American Graves Protection and Repatriation Act - Related Discoveries. Discovery of human remains shall invoke the following procedure:
    1. Within 24 hours, the DOS shall implement measures to protect the human remains from inclement weather and vandalism and shall notify the District Office of the Chief Medical Examiner (“OCME”) and the DC SHPO of the discovery. Sufficient description of the discovery shall be provided to allow OCME to complete its obligations under D.C. Code § 5-1406 or other applicable law(s).
    2. If the OCME determines that the human remains are not subject to a criminal investigation by local or federal authorities, the DOS shall determine appropriate disposition in consultation with the DC SHPO. The DOS shall comply with all applicable federal laws and regulations.
-

3. The Native American Graves Protection and Repatriation Act (25 U.S.C. § 3001 et seq), 43 C.F.R. Part 10, shall apply if human remains and any associated or unassociated funerary objects, sacred objects or objects of cultural patrimony are identified as Native American if such are encountered before the lease of any parcel to a foreign government and treatment of such remains or objects will not be subject to further review under Section 106 or this PA.
- B. Unanticipated Discoveries. In the event of post-review discovery of historic properties or unanticipated adverse effects prior to lease of any parcel to a foreign government, work shall immediately stop in the area of discovery and the DOS shall comply with 36 CFR § 800.13(b)(3). The DC SHPO shall be notified immediately, and identification and evaluation of the resource shall be undertaken by the DOS in consultation with the DC SHPO.

## VIII. ANNUAL REPORT

- A. DOS shall provide a status report to Consulting Parties, except the ACHP, to review implementation of the terms of this PA one year after the execution of this PA and annually every year following until the build-out of the FMC (i.e., all parcels are leased) is completed or the PA lapses.
- B. Status reports shall include, at a minimum:
1. a list of every contributing resource remaining not leased;
  2. the current condition of each remaining contributing resource based on periodic exterior inspections in accordance with Stipulation I(A)(5);
  3. a description of any changes to the contributing resource's condition that have occurred over the reporting period;
  4. a summary of the Budget Resource Request and Operating Plan request for funds for an environmental analysis of Building 40 in accordance with Stipulation I(E)(5);
  5. a summary of preservation advocacy efforts undertaken in accordance with Stipulation III;
  6. a summary of any post-review discoveries made in accordance with Stipulation VII;

7. a summary of any post-review changes made in accordance with Stipulation VI; and
  8. the status of any mitigation measures in accordance with Stipulation V.
- C. This information may be submitted in tabular format. Alternatively, if the Signatories agree, an annual meeting may occur to review implementation of the terms of this PA and to determine whether amendments are needed and may serve in lieu of an annual report if requested by the DOS or the DC SHPO.

## **IX. DISPUTE RESOLUTION**

- A. Should any Consulting Party to this PA object at any time to any actions proposed or the manner in which the terms of this PA are implemented, DOS shall consult with such party to resolve the objection. If DOS determines that such objection cannot be resolved, DOS shall:
1. Forward all documentation relevant to the dispute, including the DOS's proposed resolution, to the ACHP. The ACHP shall provide DOS with its advice on the resolution of the objection within 30 calendar days of receiving adequate documentation. Prior to reaching a final decision on the dispute, DOS shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and the consulting parties and provide them with a copy of this written response. DOS will then proceed according to its final decision.
  2. If the ACHP does not provide its advice regarding the dispute within the 30-calendar day time period, DOS may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, DOS shall prepare a written response that takes into account any timely comments regarding the dispute from the Consulting Parties to the PA and provide them and the ACHP with a copy of such written response.
- B. DOS's responsibilities to carry out all other actions subject to the terms of this PA that are not the subject of the dispute remain unchanged.
- C. Should any member of the public raise a timely and substantive objection pertaining to the manner in which terms of this PA are carried out, at any time during its implementation, the DOS shall take the objection into account by consulting with the objector to resolve the objection. When the DOS responds to an objection, it shall notify the Consulting Parties of the

objection and the manner in which it was resolved. The DOS may request the assistance of a Consulting Party to resolve an objection.

## **X. AMENDMENT**

This PA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment will be effective on the date a copy signed by all of the Signatories is filed with the ACHP.

## **XI. TERMINATION**

- A. If any Signatory to this PA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulation X, above. If within 30 calendar days (or another time period agreed to by all Signatories) an amendment cannot be reached, any Signatory may terminate the PA upon written notification to the other Signatories.
- B. If this PA is terminated and prior to work continuing on an individual activity that is part of the Project, DOS and NCPC must either execute a new PA pursuant to 36 CFR § 800.14(b)(3) or follow 36 CFR §§ 800.3-800.7 for each individual activity that was covered by the PA. DOS shall notify the Signatories as to the course of action it will pursue.

## **XII. ANTI-DEFICIENCY ACT**

- A. The DOS's obligations under this PA are subject to the availability of appropriated funds, and the stipulations of this PA are subject to the provisions of the Anti-Deficiency Act. The DOS shall make reasonable and good faith efforts to secure the necessary funds to implement this PA in its entirety. If compliance with the Anti-Deficiency Act alters or impairs the DOS's ability to implement the stipulations of this PA, the DOS shall consult in accordance with the amendment and terminations procedures found in Stipulations X and XI of this PA.

## **XIII. DURATION**

- A. This PA shall remain in full force and effect for 20 years after the date of the last Signatory's signature.
- B. This PA shall be reviewed periodically by the Signatories, not more than on an annual basis and not less than every five years from the execution of the PA.

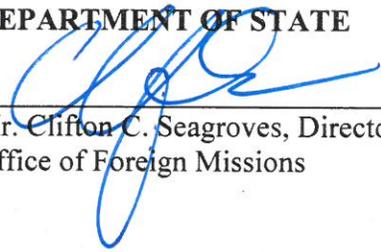
- C. One year prior to the date this PA would otherwise expire, DOS shall consult with the Signatories to determine whether the PA needs to be extended, amended, or terminated and take such actions as appropriate.

**EXECUTION** of this PA by the DOS, DC SHPO, NCPC, and the ACHP and implementation of its terms evidence that DOS and NCPC have taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

**Programmatic Agreement  
Among the  
Department of State,  
The District of Columbia State Historic Preservation Office,  
the National Capital Planning Commission, and  
the Advisory Council on Historic Preservation  
Regarding the Development, Implementation, and Maintenance of a  
Foreign Missions Center  
Within the Walter Reed Army Medical Center Historic District  
Washington, District of Columbia**

**SIGNATORY:**

**DEPARTMENT OF STATE**

  
\_\_\_\_\_  
Mr. Clifton C. Seagroves, Director (Acting)  
Office of Foreign Missions

Date: \_\_\_\_\_

*11/20/18*

**Programmatic Agreement  
Among the  
Department of State,  
The District of Columbia State Historic Preservation Office,  
the National Capital Planning Commission, and  
the Advisory Council on Historic Preservation  
Regarding the Development, Implementation, and Maintenance of a  
Foreign Missions Center  
Within the Walter Reed Army Medical Center Historic District  
Washington, District of Columbia**

**SIGNATORY:**

**DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE**

  
\_\_\_\_\_

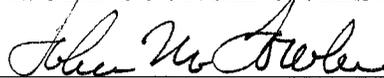
Date: 11/26/2018

Mr. David Maloney, State Historic Preservation Officer

**Programmatic Agreement  
Among the  
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Regarding the Development, Implementation, and Maintenance of a  
Foreign Missions Center  
Within the Walter Reed Army Medical Center Historic District  
Washington, District of Columbia**

**SIGNATORY:**

**ADVISORY COUNCIL ON HISTORIC PRESERVATION**



Mr. John M. Fowler, Executive Director

Date: 12/4/08

**Programmatic Agreement  
Among the  
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Washington, District of Columbia**

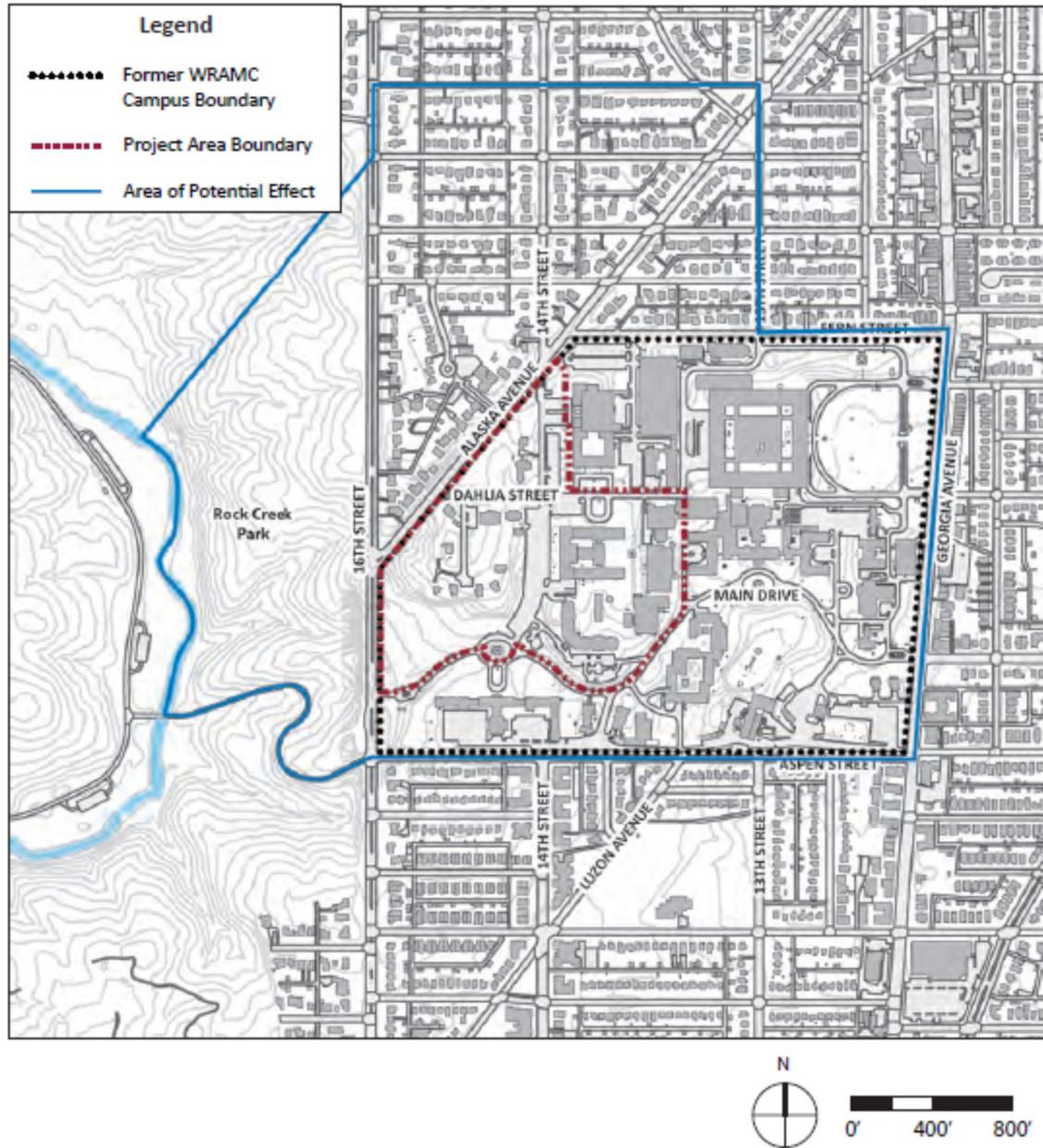
**SIGNATORY:**

**NATIONAL CAPITAL PLANNING COMMISSION**

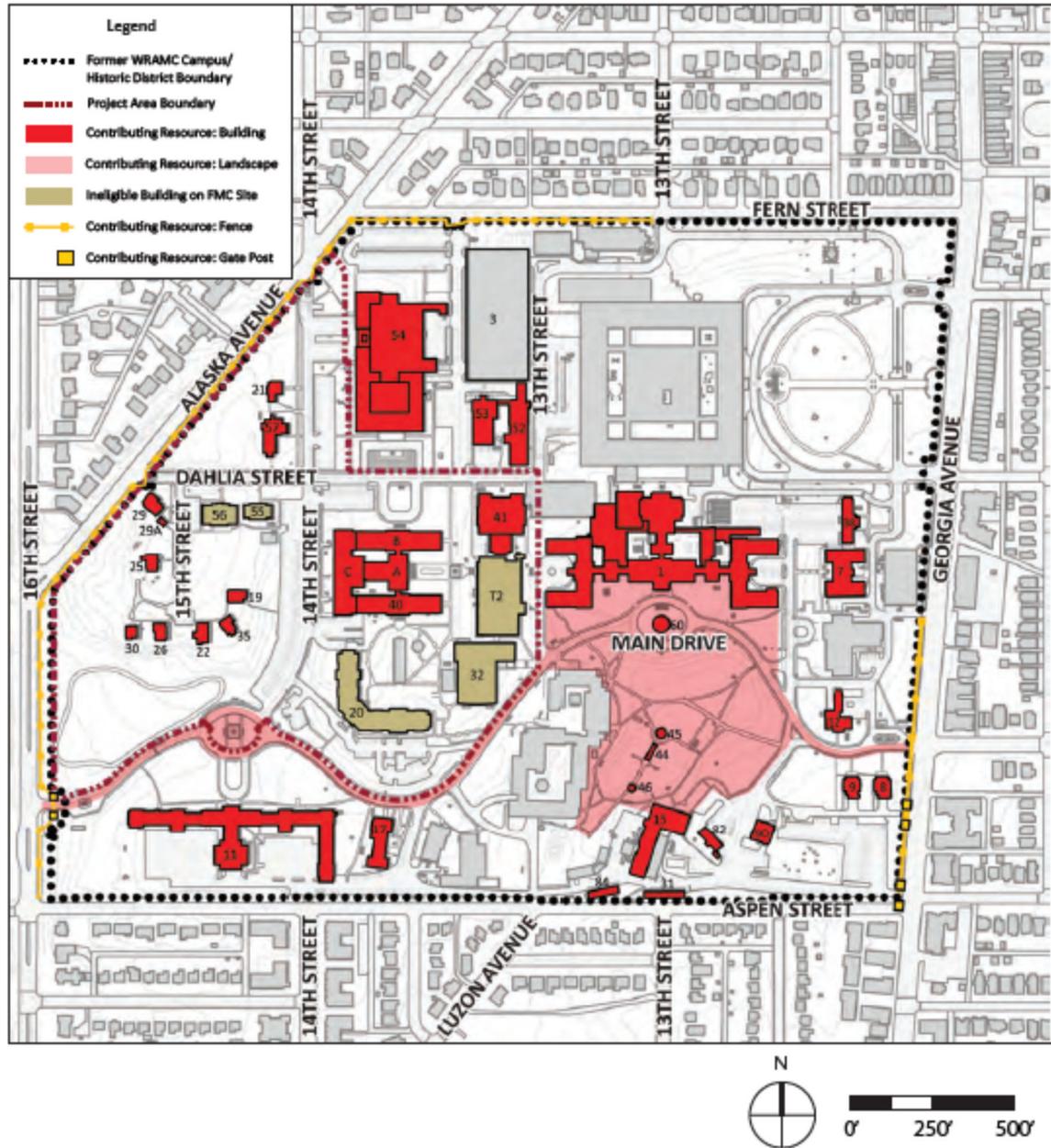
  
\_\_\_\_\_  
Mr. Marcel C. Acosta, Executive Director

Date: 11/29/18

# APPENDIX 1: Area of Potential Effect for Historic Resources



## APPENDIX 2: Walter Reed Army Medical Center Historic District Historic Resources



**APPENDIX 3: Memorandum of Agreement Between the National Capital Planning Commission and the United States Department of State, Office of Foreign Missions Regarding the Review of Chancery Development at the Foreign Missions Center, dated February 27, 2017**

**MEMORANDUM OF AGREEMENT  
BETWEEN  
THE NATIONAL CAPITAL PLANNING COMMISSION  
AND  
THE UNITED STATES DEPARTMENT OF STATE, OFFICE OF FOREIGN MISSIONS  
REGARDING  
THE REVIEW OF CHANCERY DEVELOPMENT  
AT THE FOREIGN MISSIONS CENTER**

**A. Parties and Authorities**

This Memorandum of Agreement (MOA) is entered into by and among the National Capital Planning Commission (NCPC or Commission) and the United States Department of State (the Department), Office of Foreign Missions (OFM), referred to collectively as the "Parties" and individually as a "Party," pursuant to 40 U.S.C. §§ 8722 (b)(1) and (d) which authorizes NCPC to review projects on land owned by the Federal government in the District of Columbia (District) from a planning and zoning perspective and pursuant to the Foreign Mission Act (FMA), 22 U.S.C. §§ 4301-4316, which among others, authorizes the Department to review and facilitate the operations of foreign missions in the United States (U.S.) and the terms and conditions by which benefits may be provided to foreign missions including the acquisition of land for use by a foreign country for chancery purposes.

**B. Basis for the Memorandum of Agreement**

1. This MOA is the shared understanding of the Parties with regard to the review process for development on approximately 30 acres of federally owned property located at the former Walter Reed National Military Medical Center in Washington, D.C. The property to be developed is known as the Foreign Missions Center (FMC).
2. The FMC is being developed for use by foreign diplomatic missions as individual chancery sites. The underlying property for each chancery will remain in federal ownership, and the Department intends to lease sites at the FMC to foreign countries on a long term basis for chancery development.
3. The Parties acknowledge a shared desire to facilitate the secure and efficient operation of Foreign Missions at the FMC in a manner fully consistent with U.S. interests. The parties also acknowledge the need for compliance with the requirements of the FMA.
4. The FMA allows exercise of authority under other laws pertaining to the location, replacement and expansion of chanceries provided the authority is exercised in a manner consistent with the requirements of the FMA.
5. The parties agree NCPC shall undertake the sole review of applications for the location, replacement or expansion of chanceries at the FMC. The parameters for NCPC's review of chancery applications shall be those established by the FMA including, without

limitation: 22 U.S.C. § 4306(b)(2); 22 U.S.C. § 4306(c)(2)-(3); 22 U.S.C. § 4306(d)(1)-(6); and 22 U.S.C. § 4306(f).

6. NCPC's current authority extends by statute to development at the International Chancery Center (ICC) located at Connecticut Avenue and Van Ness Street, NW. The ICC is maintained and administered by the Department, and properties at the ICC are leased to individual foreign countries for chancery development. NCPC's review authority derives from an express grant in the International Chancery Act, which created the ICC, and NCPC reviews chancery development at the ICC based on its typical review procedures. This MOA is not intended to change this approach.
7. Based on the above, the Parties agree to proceed under the terms and conditions set forth in this MOA.

**C. Roles and Responsibilities of the Parties**

1. The Department of State, Office of Foreign Missions shall:
  - a. Consult with NCPC at the earliest possible stage of an application for chancery development at the FMC.
  - b. Submit applications to NCPC for chancery development that comply with the Development Controls incorporated into the Department's Master Design Plan for the FMC.
  - c. Submit applications for chancery development to NCPC for review at a level agreed upon by NCPC and the Department (e.g., concept, preliminary, final or combined preliminary and final) and provide all application materials and information required for the particular level of review requested.
  - d. Provide the information requested in accordance with subsection C.2.c., below upon receipt of a referral letter from NCPC.
2. The National Capital Planning Commission shall:
  - a. Engage in early consultation with the Department on an application for chancery development.
  - b. Schedule a chancery application on the Commission's agenda within 90 to 95 days of receipt of a completed application submitted on or before the Submission deadline established by the Commission for a particular meeting.
  - c. Refer an application for chancery development to the Department of State, the Office of Planning, the District Department of Transportation and such other government

agencies as may be appropriate for a 60-day period to obtain information required by the Commission to evaluate an application in accordance with the decision-making criteria set forth in subsection C.2.f.i., below.

- d. Publish notice of a chancery application in NCPC's tentative and final agenda.
- e. Conduct informal proceedings before the Commission for all chancery applications. The proceeding shall focus on a staff presentation articulating the Executive Director's position on an application. A representative from the proposed Foreign Mission may make a presentation, as may OFM. The process shall include no cross examination, provided that the Commission may direct questions to those entities making presentations. Further, the process shall include public participation by those members of the public who express an interest in speaking or submit written comments, but only comments addressed to the requirements of the FMA at 22 U.S.C. § 4306(d)(1)-(6) shall be considered by the Commission.
- f. Evaluate chancery applications in accordance with the following criteria:
  - i. Criteria required by the FMA:
    1. The international obligation of the US to facilitate provision of adequate and secure facilities for the foreign mission in the nation's capital.
    2. Historic preservation . . . and in order to ensure compatibility with historic landmarks and districts, substantial compliance with . . . Federal regulations governing historic preservation shall be required with respect to new construction and to demolition of or alteration to historic landmarks.
    3. The adequacy of off street parking or other parking and the extent to which the area will be served by public transportation to reduce parking requirements, subject to such special security requirements as may be determined by the Secretary, after consultation with Federal agencies authorized to perform protective services.
    4. The extent to which the area is capable of being adequately protected, as determined by the Secretary, after consultation with Federal agencies authorized to perform protective services.
    5. The municipal interest, as determined by the Mayor of the District of Columbia.
    6. The Federal interest, as determined by the Secretary.

- g. Render a final decision to “not disapprove” or “disapprove” a chancery application not later than six months after the date a completed application is filed. The Commission’s determination shall not be subject to the administrative proceedings of any other agency or official except as may be provided by the FMA.

**D. Terms of the Memorandum of Agreement**

1. Effective Date. This MOA shall take effect upon the date of the last signature.
2. Modification. This MOA may be modified at any time by the mutual consent of the Parties.
3. Termination. This MOA may be terminated by either Party with written notice to the other Party.

**E. DISPUTE RESOLUTION**

The Parties will consult with one another about any disputes between them arising under or relating to this MOA.

**F. POINTS OF CONTACT**

1. POC. To facilitate implementation of this MOA, the following individuals shall serve as Points of Contact (POC):
  - a. For NCPC:  
Diane Sullivan  
Director, Urban Design and Plan Review Division  
401 9th Street, NW, Suite 500 N  
Washington, D.C. 20001  
(202) 482-7244  
[diane.sullivan@ncpc.gov](mailto:diane.sullivan@ncpc.gov)
  - b. For OFM: Clifton Seagroves  
Director (Acting)  
Office of Foreign Missions  
2201 C Street, NW Room 2236  
Washington, DC 205201  
(202) 647-3417  
[SeagrovesCC@state.gov](mailto:SeagrovesCC@state.gov)

**G. MISCELLANEOUS TERMS**

No Limit on Authority. Nothing in this MOA shall be construed as limiting or affecting the legal authorities of the Parties, or as requiring the parties to perform beyond their respective authorities.

**H. STANDARD CLAUSES**

1. Non-Discrimination. All activities pursuant to this MOA shall be in compliance with the requirements of Executive Order 11246, as amended; Title VI of the Civil Rights Act of 1964, as amended, (78 Stat. 252; 42 U.S.C. §§ 2000d et seq.); Title V, Section 504 of the Rehabilitation Act of 1973, as amended (87 Stat. 394; 29 U.S.C. § 794); the Age Discrimination Act of 1975 (89 Stat. 728; 42 U.S.C. §§ 6101 et seq.); and all other federal laws and regulations prohibiting discrimination on grounds of race, color, sexual orientation, national origin, disabilities, religion, age or sex.
2. Anti-Deficiency Act – 31 U.S.C. § 1341. Nothing contained in this MOA shall be construed as binding the Parties to expend in any fiscal year any sum of money in excess of appropriations made by Congress for the purposes of this MOA, or other obligation for the further expenditure of money in excess of such appropriations.

**IN WITNESS THEREOF**, the Parties hereto have caused this MOA to be executed by their duly authorized representatives.

  
\_\_\_\_\_  
Marcel C. Acosta  
Executive Director

  
\_\_\_\_\_  
Clifton C. Seagroves  
Director (Acting)

National Capital Planning Commission

Office of Foreign Missions  
U.S. Department of State

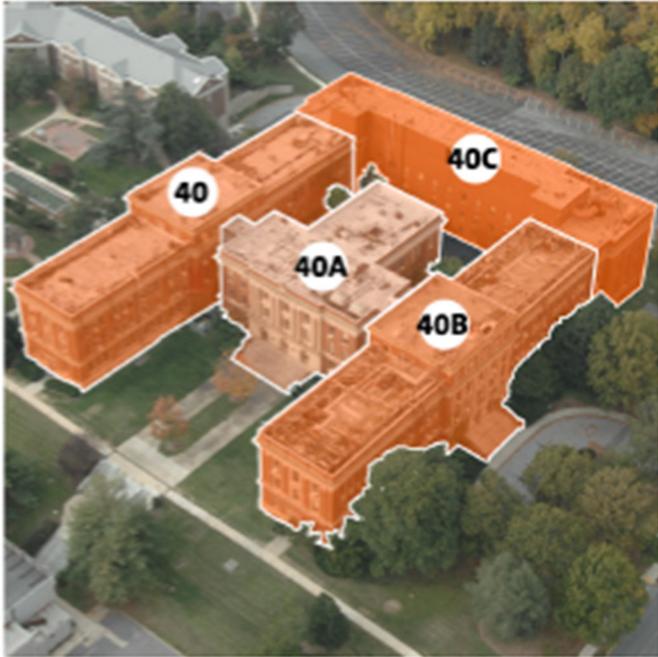
Date: Feb 27, 2017

Date: 2/27/17

cc: Anne R. Schuyler, Esq.  
General Counsel  
National Capital Planning Commission

Mary Catherine Malin, Esq.  
Assistant Legal Adviser for  
Diplomatic Law and Litigation (L/DL)  
United States Department of State

**APPENDIX 4: Diagram of Building 40 based on distinct sections.**



## APPENDIX 5: Parcelization of the FMC based on the Master Plan

JANUARY 2018

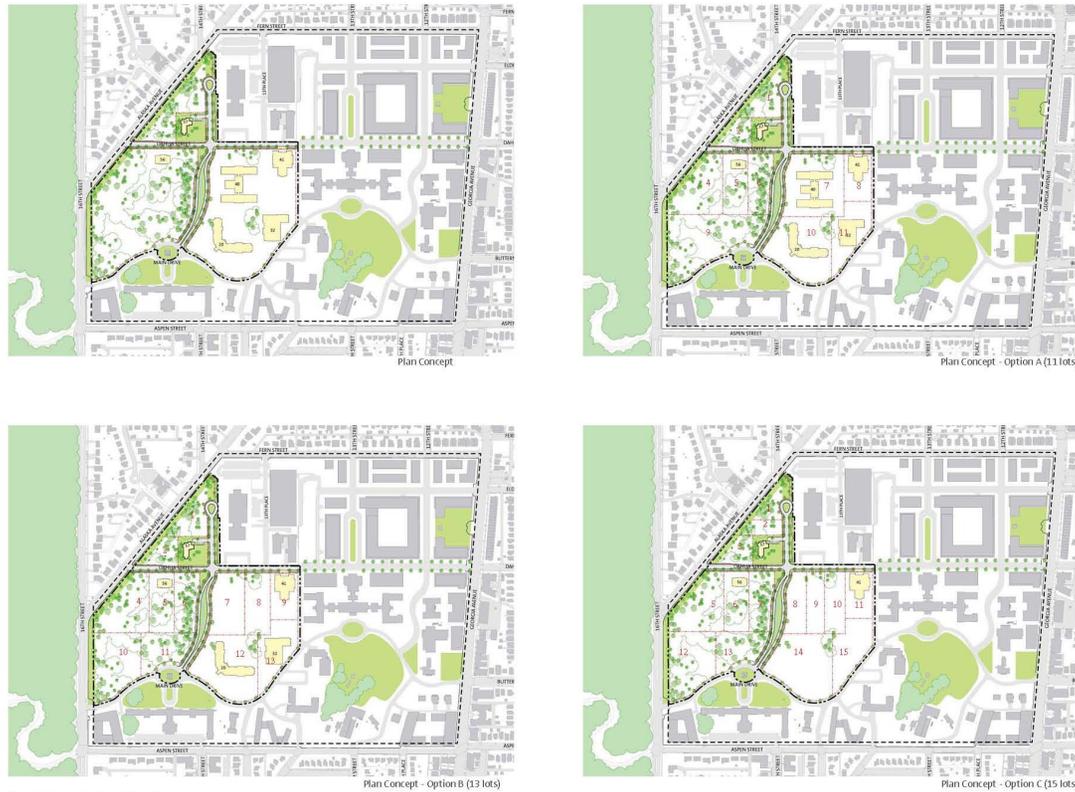


Figure 4.17: Parcelization Option Diagrams

U.S. DEPARTMENT OF STATE  
 Energy-Related Center State Plan  
 EYP



4-15

OPTION A									
Lot	Lot Size (SqFt)	Lot Size (acres)	Max. Bldg Coverage	Max. Bldg Footprint	Max. Bldg Height	Max. Bldg Area	FAR	Estimated Staff	Visitor Parking
1	74,785	1.72	25%	18,696	3	56,089	0.75	113	6
2	47,064	1.08	25%	11,766	3	35,298	0.75	71	6
Chapel	39,640	0.91	Bldg 57	5,533	1	6,632	0.17	4	8
4	126,304	2.90	20%	25,261	4	101,043	0.80	203	6
5	74,392	1.71	25%	18,598	4	74,392	1.00	149	6
6	68,593	1.57	30%	20,578	4	82,312	1.20	165	6
7	178,679	4.10	Bldg 40	63,544	4	246,271	1.38	493	6
8	71,169	1.63	Bldg 41	19,062	3	50,023	0.70	101	6
9	212,188	4.87	15%	31,828	4	127,313	0.60	255	10
10	175,098	4.02	20%	35,020	4	140,078	0.80	281	10
11	88,737	2.04	30%	26,621	4	106,484	1.20	213	10

OPTION B									
Lot	Lot Size (SqFt)	Lot Size (acres)	Max. Bldg Coverage	Max. Bldg Footprint	Max. Bldg Height	Max. Bldg Area	FAR	Estimated Staff	Visitor Parking
1	74,785	1.72	25%	18,696	3	56,089	0.75	113	6
2	47,064	1.08	25%	11,766	3	35,298	0.75	71	6
Chapel	39,640	0.91	Bldg 57	5,533	1	6,632	0.17	4	8
4	126,304	2.90	20%	25,261	4	101,043	0.80	203	6
5	43,627	1.00	25%	10,907	4	43,627	1.00	88	6
6	99,358	2.28	30%	29,807	4	119,230	1.20	239	6
7	89,333	2.05	30%	26,800	4	107,200	1.20	215	6
8	89,346	2.05	30%	26,804	4	107,215	1.20	215	6
9	71,169	1.63	Bldg 41	19,062	3	50,023	0.70	101	6
10	119,239	2.74	15%	17,886	4	71,543	0.60	144	10
11	92,949	2.13	15%	13,942	4	55,769	0.60	112	10
12	175,098	4.02	20%	35,020	4	140,078	0.80	281	10
13	88,737	2.04	30%	26,621	4	106,484	1.20	213	10

OPTION C									
Lot	Lot Size (SqFt)	Lot Size (acres)	Max. Bldg Coverage	Max. Bldg Footprint	Max. Bldg Height	Max. Bldg Area	FAR	Estimated Staff	Visitor Parking
1	41,599	0.95	25%	10,400	3	31,199	0.75	63	6
2	33,186	0.76	25%	8,297	3	24,890	0.75	50	6
3	47,064	1.08	25%	11,766	3	35,298	0.75	71	6
Chapel	39,640	0.91	Bldg 57	5,533	1	6,632	0.17	4	8
5	126,304	2.90	20%	25,261	4	101,043	0.80	203	6
6	74,392	1.71	25%	18,598	4	74,392	1.00	149	6
7	68,593	1.57	30%	20,578	4	82,312	1.20	165	6
8	58,844	1.35	30%	17,653	4	70,613	1.20	142	6
9	60,978	1.40	30%	18,293	4	73,174	1.20	147	6
10	58,856	1.35	30%	17,657	4	70,627	1.20	142	6
11	86,061	1.98	Bldg 41	19,062	3	50,023	0.58	101	6
12	119,239	2.74	15%	17,886	4	71,543	0.60	144	10
13	92,949	2.13	15%	13,942	4	55,769	0.60	112	10
14	175,098	4.02	20%	35,020	4	140,078	0.80	281	10
15	88,737	2.04	30%	26,621	4	106,484	1.20	213	10

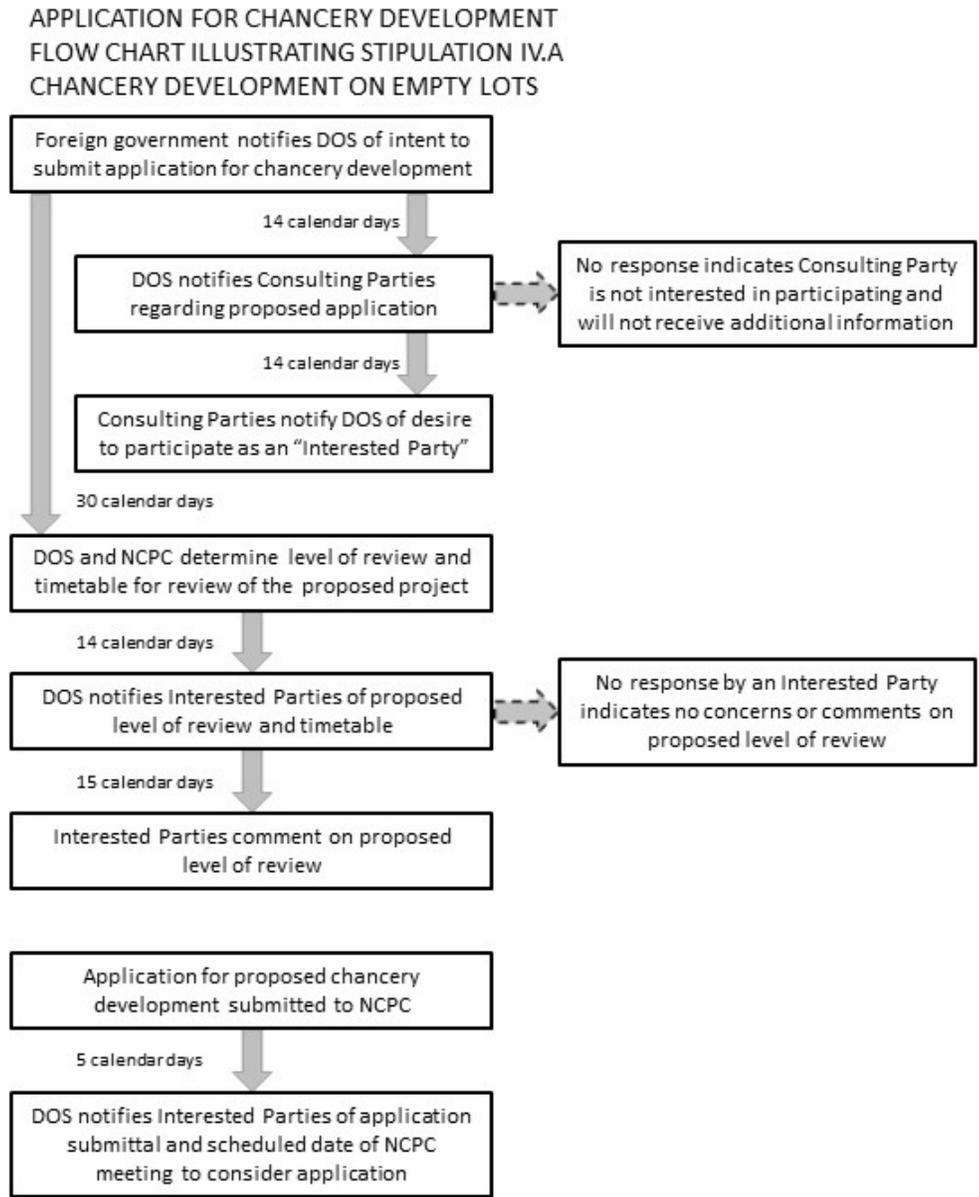
Table 4.1: Site, Building & Personnel Data

REMAINDER		
Lot	Lot Size (SqFt)	Lot Size (acres)
Roads	196,350	4.51
Ellipse	10,977	0.25
Parkway Median	11,945	0.27
Park	3,574	0.08
<b>CAMPUS TOTAL</b>	<b>1,379,495</b>	<b>31.67</b>

SUMMARY				
	Max Bldg Area	Campus-wide FAR	Avg Max Bldg Area	Avg Lot FAR
Option A	1,025,935	0.74	85,495	0.78
Option B	1,000,232	0.73	71,445	0.78
Option C	994,078	0.72	66,272	0.85

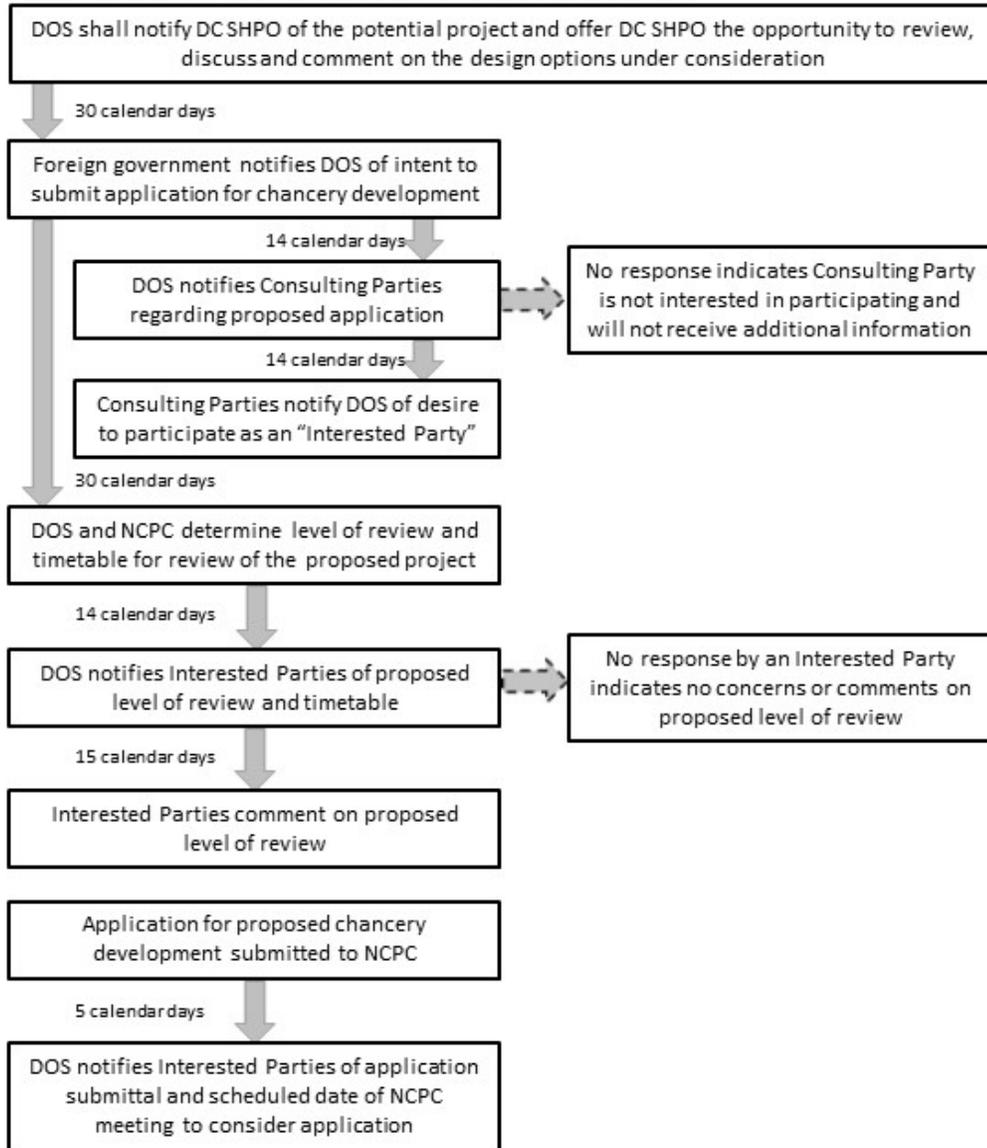
This table shows the individual lot sizes and the maximum building size and FAR which is based on the site massing and lot development guidelines (shown in the Design Guidelines section). FAR stands for Floor to Area Ratio and is a standard metric for measuring development density.

**APPENDIX 6: Illustration of review process for Application for Chancery Development on Empty Lots**



**APPENDIX 7: Illustration of review process for Application for Chancery Development involving Adaptive Use of Buildings 40 or 41**

APPLICATION FOR CHANCERY DEVELOPMENT  
 FLOW CHART ILLUSTRATING STIPULATION IV.B  
 CHANCERY DEVELOPMENT INVOLVING BLDGS 40 OR 41





## Appendix B

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# ***DDOT Correspondence***

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**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**DEPARTMENT OF TRANSPORTATION**



**d. Policy, Planning and Sustainability Administration**

August 11, 2016

Geoffrey Hunt  
Department of State  
A/OPR/RPM  
HST Room 1264  
Washington, DC 20520-1264

RE: Draft Environmental Impact Statement (DEIS) Comprehensive Transportation Review (CTR) Update for the Master Plan for the proposed Foreign Mission Center (FMC) at the former Walter Reed Army Medical Center (WRAMC)

Dear Mr. Hunt:

The District Department of Transportation (DDOT) appreciates the opportunity to submit this letter. DDOT is committed to achieving an exceptional quality of life in the nation's capital by encouraging sustainable travel practices, constructing safer streets, and providing outstanding access to goods and services. As one means to achieve this vision, DDOT works with federal projects to ensure that impacts from new developments take advantage of the District's multimodal transportation network and minimize impacts on neighborhood streets and the broader transportation network. DDOT supports the proposed FMC plan to provide valuable space to the increased diplomatic presence in the District and looks forward to continued coordination with the Department of State (DoS) for a successful project.

All federal projects are expected to appropriately document and mitigate their impacts on the District's transportation network. In addition to the issues identified in the DEIS, DoS will be expected to obtain public space permits for access points and any fixtures or improvements to the District's public space. DDOT's review of the DEIS should not be viewed as an approval of public space elements. If any portion of the project has elements in the public space requiring approval, DoS is required to pursue a public space permit through DDOT's permitting process. DoS may refer to the District of Columbia Municipal Regulations and DDOT's Design and Engineering Manual for specific controls of public space. A summary can be found in DDOT's Public Realm Design Manual. DDOT anticipates that all outstanding

analysis and identified mitigation measures will be appropriately resolved in advance of the final Environmental Impact Statement.

The FMC CTR represents the latest planning effort to assess the transportation impacts and needed mitigations associated with the redevelopment of WRAMC. The District portion of the site (referred to as the Local Redevelopment Authority or LRA) was studied under the Ruse Plan and Small Area Plan (SAP) processes. During the SAP process, DDOT scoped a CTR to determine the impact of the proposed development plan on the overall transportation network. The CTR completed in August, 2012 reflects the expected impacts and needed mitigations in order to support the proposed level of development. The FMC CTR builds upon the LRA CTR and is expected to identify mitigations to address FMC impacts.

After an extensive, multi-administration review of the CTR dated June 22, 2016, DDOT finds:

#### **Site Design**

- Primary vehicular access to the site is proposed from 16<sup>th</sup> Street at Main Drive and from the Alaska Avenue/Dahlia Street intersection;
- Vehicular access to the site at 14<sup>th</sup> Street/Alaska Avenue intersection has been removed from the previous proposal, but pedestrian and bicycle access will be permitted;
- The new north-south and east-west publicly accessible streets have the potential to improve connectivity to the adjacent neighborhoods, but will be under private control and will not be part of DDOT's public street inventory; and
- Lots with access to the DoS street network are expected to provide vehicular site access from a private street. Site access for each chancery will be determined as development programs are finalized. Vehicular site access to each chancery is expected to meet DDOT standards and approval of curb cuts on public streets will be required through DDOT's public space permitting process.

#### **Travel Assumptions**

- The proposed 1.05 parking spaces for each employee is significantly higher than is typical of development in the District and exceeds the National Capital Planning Commission's recommended parking rate of one space per four employees;
- To account for the high parking provisions and provide a conservative parking analysis, the analysis assumes a 100% auto mode split. As such, the development is expected to generate a significant number of new vehicle trips; and
- The analysis assumes all transportation improvements identified in the LRA CTR to be in place at the time the FMC development is complete.

#### **Analysis**

- The development is projected to significantly impact nine intersections within the study area;
- The closure of the 14<sup>th</sup> Street and Alaska gate concentrates impacts at remaining site entrances and limits connectivity within the vicinity; and

- The proposed mitigations do not adequately mitigate impacts from the FMC development. Furthermore, LRA-identified mitigations may not be in place when warranted by the FMC development, thus exacerbating FMC impacts.

## **Mitigations**

As part of all major development review cases, DDOT requires the Applicant to mitigate the impacts of the development in order to positively contribute to the District's transportation network. The mitigations must sufficiently diminish the action's vehicle impact and promote non-auto travel modes. This can be done through Transportation Demand Management (TDM) measures, physical improvements, operational changes, and performance monitoring.

DDOT's preference is to mitigate vehicle traffic impacts first through establishing an optimal site design and operations to support efficient site circulation. When these efforts alone cannot properly mitigate an action's impact, TDM measures may be necessary to manage travel behavior to minimize impact. Only when these other options are exhausted will DDOT consider capacity-increasing changes to the transportation network because such changes often have detrimental impacts on non-auto travel and are often contrary to the District's multi-modal transportation goals.

The following analysis is a review of DoS's proposed mitigations and a description of DDOT's evaluation of the adequacy of the mitigations to mitigate the identified impacts. In sum, the proposed mitigations have not been thoroughly studied and do not adequately mitigate the identified impacts, thus additional or revised mitigations are required. Furthermore, to account for the LRA mitigations that may not be in place at the time they would mitigate impacts from the FMC, DoS should commit to implementation of several LRA-identified mitigations under certain development scenarios discussed below.

### Roadway Capacity and Operations

Nine intersections within the study area are expected to operate under failing conditions as measured by Level of Service (LOS) or are significantly degraded as a result of the FMC development. Of note, the CTR assumes all transportation improvements associated with the Walter Reed LRA Reuse Plan to be in place at the time the FMC development is complete, allowing the FMC analysis to take advantage of the capacity improvements by others. However, the LRA CTR was based on an assumption that mitigations would be completed by 2022. Phasing of the LRA development and the associated mitigations may now take place over a longer period of time. Accordingly, should the LRA improvements not be in place at critical FMC development milestones, the FMC development is expected to have additional impacts not identified in the FMC CTR. Therefore, it is critical that certain mitigations identified as being triggered by the LRA development be the partial or full responsibility of DoS if significant progress (defined as at least 50% of total potential developable square feet of the overall LRA program) on the LRA development has not been achieved by the time the FMC site is 50% completed (defined in terms of total potential developable square feet). The analysis in the CTR did not include a phasing of FMC-related impacts or proposed mitigations. In the absence of this phasing plan, a commitment to implementing LRA-

identified mitigations at 50% build-out of the FMC site is proposed by DDOT as a reasonable milestone at which transportation impacts can be expected.

The following table identifies impacted intersections, summarizes any capacity improvements proposed by DoS to mitigate these impacts, and DDOT’s response evaluation of the needed mitigations:

Intersection	DoS Proposed Mitigation	DDOT Evaluation
16th Street and Alaska Avenue	In addition to improvements noted in the LRA Reuse Plan, DoS proposes to shift green time to the westbound approach.	<p>The recommendation for this intersection is based on improvements identified in the LRA Reuse Plan. DoS should coordinate with the LRA and commit to implement the LRA-identified improvements if the development milestones identified above are met.</p> <p>Any adjustments to signal timings to improve one movement at an intersection will negatively impact other movements, as well as intersections up- and down-stream. Thus, signal timings for all intersections in the vicinity will be reviewed comprehensively within the context of DDOT’s ongoing Signal Optimization efforts to determine optimal timings for the network. As such, DoS initiated signal retimings for this intersection are inappropriate mitigations. Instead, mitigations focused on reducing auto mode travel should be pursued.</p>
16th Street and Main Drive	In addition to improvements noted in the LRA Reuse Plan, DoS proposes to restripe the westbound approach of Main Drive as one left-turn lane and one shared left/right turn.	<p>The recommendation for this intersection is based on improvements identified in the LRA Reuse Plan. DoS should coordinate with the LRA and commit to implement the LRA-identified improvements if the development milestones identified above are met.</p> <p>Impacts at this intersection are caused in large part by the exclusion of a vehicular access point at the 14th Street/Alaska Avenue intersection. Thus, DDOT strongly encourages DoS to re-evaluate the exclusion of a vehicular access point at the 14th Street/Alaska Avenue intersection. Creating vehicle access at this location will help to distribute site traffic, thus reducing impacts at the other access points. The design of this access point would need to be carefully designed to facilitate access along Alaska Avenue without encouraging site traffic to use local streets to the north of the site.</p> <p>DoS must provide DDOT with further study of the feasibility and tradeoffs associated with this proposed mitigation, including but not limited to determining if the right-of-way is wide enough to accommodate the turn lane, defining any impacts to on-street parking, street trees, or sidewalks, provide more detailed concept drawings showing the proposal, and perform additional community outreach to better understand community impacts.</p>

Intersection	DoS Proposed Mitigation	DDOT Evaluation
		<p>In addition, with the existing placement of the crosswalk on the south side of the intersection, this improvement is not feasible without implementing an exclusive pedestrian phase. DoS must revise the analysis to accommodate a separate pedestrian phase, commit to rebuilding the intersection to relocate the existing crosswalk across 16th Street and move the existing bus stops, or suggest additional improvements to mitigate the site-generated impact.</p>
16th and Van Buren Street (North and South)	DDOT should consider outside the scope of the FMC CTR removing the signal along the eastbound approach of Van Buren Street to eliminate the need for a split phase signal.	DoS should study this proposed mitigation and be responsible for public outreach, design, and implementation of the mitigation, if deemed appropriate by DDOT.
Georgia Avenue & Aspen Street	Outside of improvements listed in the LRA, DoS proposes no additional improvements.	Due to limitations within the right-of-way, vehicle capacity improvements are challenging. Instead, mitigations focused on reducing auto mode travel should be pursued.
Georgia Avenue and Butternut Street	Outside of improvements listed in the LRA, DoS proposes no additional improvements.	Due to limitations within the right-of-way, vehicle capacity improvements are challenging. Instead, mitigations focused on reducing auto mode travel should be pursued.
Georgia Avenue and Dahlia Street	DoS proposes no additional improvements.	Due to limitations within the right-of-way, vehicle capacity improvements are challenging. Instead, mitigations focused on reducing auto mode travel should be pursued.
Georgia Avenue and Elder Street	DDOT should evaluate this intersection outside the scope of this CTR.	This intersection is impacted by the FMC development but not adequately mitigated by DoS. Mitigations focused on reducing auto mode travel should be pursued.
Dahlia Street and Alaska Avenue	DoS proposes constructing a 100-foot westbound right-turn lane.	<p>Impacts at this intersection are caused in large part by the exclusion of a vehicular access point at the 14th Street/Alaska Avenue intersection. Thus, DDOT strongly encourages DoS to re-evaluate the exclusion of a vehicular access point at the 14th Street/Alaska Avenue intersection. Creating vehicle access at this location will help to distribute site traffic, thus reducing impacts at the other access points. The design of this access point would need to be carefully designed to facilitate access along Alaska Avenue without encouraging site traffic to use local streets to the north of the site.</p> <p>DoS must provide DDOT with further study of the feasibility and tradeoffs associated with this proposed mitigation, including but</p>

Intersection	DoS Proposed Mitigation	DDOT Evaluation
		not limited to determining if the right-of-way is wide enough to accommodate the turn lane, defining any impacts to on-street parking, street trees, or sidewalks, provide more detailed concept drawings showing the proposal, and perform additional community outreach to better understand community impacts.
Transportation Demand Management (TDM)	TDM plans will be required as part of a TMP for each chancery (no specific TDM requirements are proposed).	Impacts to several intersections cannot be fully mitigated through capacity improvements due to limitations of the right-of-way or traffic signal-related constraints. Therefore, impacts at these intersections should be mitigated through efforts to reduce auto mode travel. Robust TDM elements are an important component of the overall mitigation package needed to address the identified site impacts. DoS should coordinate with DDOT prior to completing the EIS to develop an acceptable list of mitigations to promote non-auto travel. TDM is discussed further in the TDM subsection below.

Transit Improvements

DoS proposes to work with DDOT on improving the bus stops as part of the public space improvements along the perimeter of the site, to include elements such as a shelter. Improvements to the public space, including upgrading pedestrian infrastructure, will improve conditions for bus riders. DDOT reviews bus shelter installation requests to determine if one is warranted and oversees bus shelter installations. Private and federal entities such as DoS are not eligible to purchase and/or install bus shelters. Accordingly, DDOT cannot guarantee the appropriateness of a bus shelter or ensure the availability of a bus shelter for future installation DoS should submit a bus shelter installation request for DDOT’s review during public space permitting process.

Pedestrian Improvements

To mitigate pedestrian impacts, DoS recommends the following improvements to be implemented internal to the site and at external roadways bordering the FMC development:

- Expand sidewalks widths, remove obstructions, install and upgrade crosswalks at intersections, install traffic calming measures, and improve accessibility at the reopened gates and open spaces along 16<sup>th</sup> Street, Alaska Avenue, Fern Street, Georgia Avenue, and Aspen Street;
- Implement Leading Pedestrian Intervals (LPis) at the signalized crossing along Georgia Avenue and 16<sup>th</sup> Street to assist safety for east-west pedestrian crossings upon build out of the site;

- Add east-west and north-south pedestrian connections through the site to provide better access and routing between the site and the surrounding neighborhood. New routing options and crossing locations will help disperse pedestrian traffic along various routes, which will mitigate the impact of increased pedestrian volumes to any one intersection or sidewalk segment. It will also reduce the need to make significant changes to intersections that would attract additional pedestrian volumes warranting new traffic control devices or changes to intersection geometry.

While these recommendations have the potential to support pedestrian use and encourage mode shift from auto, DoS must provide to DDOT additional details and specify the exact pedestrian improvements proposed. In particular, LPIs accounted for in the capacity analysis and further reviewed by DDOT.

### Bicycle Improvements

To mitigate site impacts associated with bicycle trips, DoS proposes the following measures to support connectivity and encourage bicycle mode shift:

- Ensure roadways internal to the site accommodate bicycle travel;
- All shared-use trails shall be designed to a minimum of 10' wide with a 2' shoulder to accommodate bicycle and pedestrian activities;
- Recommend bicycle facilities be extended by the District from northern edge of the WRAMC campus to the north;
- Provide crosswalks and all-way stops at site entrances to ensure bicycle access to the site;
- Add bike racks outside of buildings on the site;
- Provide the bicycle commuter benefit to employees on site; and
- Provide short and long-term bicycle parking based on existing District code and requirements.

In addition, DoS proposes a wide, multi-use path to ensure pedestrian and bicycle connectivity to the 14<sup>th</sup> Street/Alaska Avenue intersection. The design of this facility, particularly its intersection with the DDOT right-of-way at the Alaska Avenue and 14<sup>th</sup> Street intersection, should be coordinated with DDOT to ensure a continuous bicycle and pedestrian facility that aligns with the intersection of 14<sup>th</sup> Street/Alaska Avenue. DoS should also coordinate with the LRA to align bicycle improvements such that they provide seamless bicycle connectivity throughout WRAMC.

### Transportation Demand Management

As part of all major development review cases, DDOT requires a comprehensive TDM plan to help mitigate an action's transportation impacts. TDM is a set of strategies, programs, services, and physical elements that influence travel behavior by mode, frequency, time, route, or trip length in order to help achieve highly efficient and sustainable use of transportation facilities. In the District, this typically means implementing infrastructure or programs to maximize the use of mass transit, bicycle and pedestrian facilities, and reduce single occupancy vehicle trips during peak periods. DoS's proposed TDM measures play a role in achieving the desired and expected mode split.

The specific elements within the TDM plan vary depending on the land uses, site context, proximity to transit, scale of the development, and other factors. DoS proposes to include TDM elements as a part of the design guidelines for chanceries being developed within the FMC.

DDOT expects the design guidelines to require that each chancery's TDM plan include the following measures which are in line with District zoning regulations:

- Provide one long-term bike parking space for each 5,000 square-feet of gross floor area (GFA) and one short-term bike parking space per 40,000 square-feet of GFA,
- Provide two showers for the first 25,000 square feet of GFA. An additional two showers shall be installed for every 50,000 square feet of GFA above the first 25,000 square-feet, up to a maximum requirement of six showers;
- Provide a bike repair station; and
- Provide a minimum number of clothing lockers equal to 60% of the required long-term bicycle parking spaces.

In addition, DDOT strongly encourages additional robust TDM elements as a means to address impacts to several intersections that cannot be fully mitigated through capacity improvements and to support the District's goal of shifting 75% of all commute trips to non-auto modes. DoS should coordinate with DDOT prior to completing the EIS to develop an acceptable list of mitigations to promote non-auto travel. Effective TDM measures are expected to include investments in non-auto travel infrastructure as well as programmatic investments at the chancery level. Possible addition TDM requirements include:

- Fund a Capital Bikeshare station on the FMC campus;
- Designate a TDM coordinator responsible for organizing and marketing the TDM plan;
- Install electronic displays in the main lobby of each of chancery that will display real-time transit availability; and
- Offer a subsidized annual Capital Bikeshare membership to full-time and part-time employees for the first 5 years of occupancy.

To reflect the individual development program and needs of each chancery, TDM plans will be developed with each foreign government as the chancery sites are developed and included as part of each chancery's Transportation Management Plan (TMP). DoS proposes that DDOT will review each TMP. DDOT will review the TMPs to ensure that the TDM elements adequately manage demand for auto travel, and additional TDM measures may be identified.

### **Continued Coordination**

Given the complexity and size of the project, DDOT expects to continue to work on the final design of the following matters:

- Transit accommodation;
- Develop an acceptable list of required TDM measures to promote non-auto travel;
- Public space design, including curb & gutter, street trees and landscaping, street lights, sidewalks, and other appropriate features within the public rights of way bordering the site.

Careful attention should be paid to pedestrian and bicycle connections along the site's perimeter and the adjacent infrastructure;

- Curb cut design and approvals for the proposed access points;
- Signal design and timing of all new traffic signals to optimize performance of the road network while providing ample pedestrian crossing time;
- Quantity and location of short- and long-term bicycle parking;
- Design of the multi-use trail connecting the site with the 14<sup>th</sup> Street and Alaska Avenue intersection;
- Phasing of needed mitigation and improvements measures;
- Possible pedestrian and bicycle access easements within the site;
- Transportation easements along Main Drive; and
- Access easements for the northern portion of the Main Drive ellipse.

### **Conclusion**

Please provide a revised CTR that responds to the above comments and adequately mitigates the FMC project impacts. Should you have any questions, please contact Jonathan Rogers, the Case Manager for the project at [jonathan.rogers2@dc.gov](mailto:jonathan.rogers2@dc.gov) or 202-671-3022.

Sincerely,



Sam Zimbabwe  
Associate Director



**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF TRANSPORTATION**



**d. Policy, Planning and Sustainability Administration**

February 14, 2017

Geoffrey Hunt  
Department of State  
A/OPR/RPM  
HST Room 1264  
Washington, DC 20520-1264

RE: Draft Environmental Impact Statement (DEIS) Comprehensive Transportation Review (CTR) January 24, 2017 revision for the Master Plan for the proposed Foreign Mission Center (FMC) at the former Walter Reed Army Medical Center (WRAMC)

Dear Mr. Hunt:

The District Department of Transportation (DDOT) appreciates the opportunity to review the revised CTR dated January 24, 2017. DDOT's review of the original CTR dated June 22, 2016 found that the action is expected to have numerous negative impacts to the District's multimodal transportation network and proposed mitigations were insufficient or inappropriate to address these impacts. These findings were described in our August 11, 2016 letter to the Department of State (DoS).

DDOT finds that our August 11, 2016 comments have not been addressed in the revised CTR. In order to address our concerns and adequately mitigate impacts DDOT expects the following measures to be implemented by the DoS:

Site Design

- Provide a 14<sup>th</sup> Street multimodal connection at Fern Street

The CTR identifies several impacted intersections not proposed to be mitigated, including 16th Street & Main Drive and Dahlia Street & Alaska Avenue. Impacts at these intersections are caused in large part by the exclusion of a vehicular access point at the 14th Street/Alaska Avenue intersection. Vehicle access at this location is needed to distribute site traffic and reduce impacts at the other access points. The intersection should be redesigned so it intersects at a

90-degree angle in order to improve site distance issues and provide continuous bicycle and pedestrian connections to the external network.

- Ensure full public access will be maintained on private streets at all times

14<sup>th</sup> Street between Main Drive, Fern and Dahlia streets between the LRA site and Alaska Avenue, and the northern segment of the Main Drive circle are proposed to be private streets. These streets serve as important connections to the rest of the WRAMC campus to public streets that will help distribute site traffic throughout the network. Furthermore, additional connectivity was a central element throughout the entire planning process for the redevelopment of the WRAMC campus. As such, maintaining public access except in limited instances of security justification is needed. DoS should coordinate with DDOT to define a process and establish thresholds for security-related street closures. In addition, if desirable by DDOT or the Washington Metropolitan Area Transit Authority, DoS should allow bus routes and stops on the private streets.

- Ensure site access meets DDOT standards

Vehicular site access to each chancery is expected to meet DDOT standards. Parcels with access to the DoS street network are expected to provide vehicular site access from such streets and not from a public street. Curb cuts from a public street will be required to be at least 60' from an existing or proposed intersection, 32' from adjacent curb cuts, and between 10-14' wide for one-way circulation or 20-24' wide for two-way circulation. Furthermore, no backing truck maneuvers will be permitted across a public sidewalk. Approval of curb cuts on public streets will be required through DDOT's public space permitting process.

- Design private street to DDOT design and construction standards

Private street designs are expected to meet DDOT design and construction standards. Within the rights-of-way, standard lane widths and sidewalk cross sections (including a minimum 8' wide sidewalk and 4' tree box) are expected to be implemented. Coordination with the LRA and DDOT is needed to align vehicular, pedestrian, and bicycle improvements on the FMC such that they provide seamless connectivity throughout WRAMC. DoS should coordinate with DDOT on the design of the private road network and DDOT should approve of conceptual street designs.

### Mitigations

- Dahlia Street/Alaska Avenue

The CTR recommends that "the District and DoS coordinate to implement "a 100-foot right turn lane. This mitigation is required to mitigate the impacts of the DoS action and, furthermore, the westbound approach of Dahlia at this intersection is located entirely on DoS property. As such, DoS is expected to design, fund, and implement the right-turn lane. As part of the installation of the turn lane, the intersection should be redesigned so it intersects at a 90-degree angle in order to improve site distance issues.

- Main Drive improvements

The CTR assumes the 100' westbound right turn lane identified by the Walter Reed LRA Reuse Plan to be in place at the time the FMC development is complete, allowing the FMC analysis to take advantage of the capacity improvements by others. However, the LRA CTR was based on an assumption that mitigations would be completed by 2022. Phasing of the LRA development and the associated mitigations may now take place over a longer period of time. Accordingly, should the LRA improvements not be in place at critical FMC development milestones, the FMC development is expected to have additional impacts not identified in the FMC CTR. Therefore, DoS should install the westbound turn lane if this mitigation has not already been installed by the LRA at 50% build-out of the FMC site.

- 16<sup>th</sup> Street/Alaska Avenue

The CTR assumes the 100' northbound right turn lane identified by the Walter Reed LRA Reuse Plan to be in place at the time the FMC development is complete, allowing the FMC analysis to take advantage of the capacity improvements by others. However, the LRA CTR was based on an assumption that mitigations would be completed by 2022. Phasing of the LRA development and the associated mitigations may now take place over a longer period of time. Accordingly, should the LRA improvements not be in place at critical FMC development milestones, the FMC development is expected to have additional impacts not identified in the FMC CTR. Therefore, DoS should install the northbound turn lane if this mitigation has not already been installed by the LRA at 50% build-out of the FMC site.

- 16<sup>th</sup> Street/Sherrill Drive/Aspen Street

The CTR recommends that “the District and DoS coordinate to determine if a [150'] southbound right-turn is feasible at this intersection.” This mitigation would require shifting the curbline westbound toward the park, which would degrade the pedestrian experience along 16<sup>th</sup> Street and create a misalignment in the crosswalk on the west side of 16<sup>th</sup> Street at Aspen Street/Sherrill Drive. Accordingly, DDOT does not find this to be an appropriate mitigation. Instead, mitigations focused on reducing auto mode travel should be pursued. Specifically, DoS should fund the installation and first year’s operation expenses of a new 19-dock Capital Bikeshare station in close proximity to the Takoma Metro station to provide a “last mile” transit connection.

- TDM

Robust TDM elements are an important component of the overall mitigation package needed to address the identified site impacts. DDOT expects each chancery to implement the following measures which are in line with District zoning regulations:

- Provide one long-term bike parking space for each 5,000 square-feet of gross floor area (GFA) and one short-term bike parking space per 40,000 square-feet of GFA;
- Provide two showers for the first 25,000 square feet of GFA. An additional two showers shall be installed for every 50,000 square feet of GFA above the first 25,000 square-feet, up to a maximum requirement of six showers; and
- Provide a minimum number of clothing lockers equal to 60% of the required long-term bicycle parking spaces.

In addition, DDOT strongly encourages additional robust TDM elements as a means to address impacts to several intersections that cannot be fully mitigated through capacity improvements. DoS should coordinate with DDOT prior to completing the EIS to develop a campus-wide TDM plan that includes:

- DoS should fund the installation and first year's operation expenses of a new 19-dock Capital Bikeshare station on the FMC campus in a mutually acceptable location to the DoS and DDOT;
- As noted above, in lieu of the 16<sup>th</sup> Street/Sherrill Drive/Aspen Street southbound right turn lane, DoS should fund the installation and first year's operation expenses of a new 19-dock Capital Bikeshare station in close proximity to the Takoma Metro station to provide a "last mile" transit connection; and
- Designate a TDM coordinator responsible for organizing and marketing the TDM plan.

To reflect the individual development program and needs of each chancery, TDM plans will be developed with each foreign government as the chancery sites are developed and included as part of each chancery's Transportation Management Plan (TMP). DoS proposes that DDOT will review each TMP. As part of the EIS, DoS is expected to detail the TMP process to better define DDOT's role and authority to enforce TDM requirements for each individual chancery. In addition, DoS should coordinate with DDOT to develop an acceptable list of chancery-level TDM elements to promote non-auto travel.

### **Continued Coordination**

DoS will be required to obtain public space permits for access points and any fixtures or improvements to the District's public space. As part of the public space permitting process, DDOT will expect DoS to implement the mitigations noted above. In the absence of the necessary mitigations identified by DDOT, the Applicant may not receive public space permits.

Given the complexity and size of the project, DDOT expects to continue to work on the final design of the following matters:

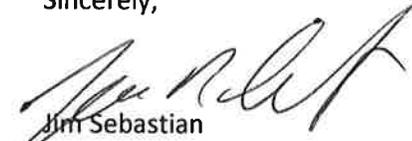
- Public space design, including curb & gutter, street trees and landscaping, street lights, sidewalks, and other appropriate features within the public rights of way bordering the site. Careful attention should be paid to pedestrian and bicycle connections along the site's perimeter and the adjacent infrastructure;
- Curb cut design and approvals for the proposed access points;
- An acceptable list of chancery-level TDM measures to promote non-auto travel;
- Potential future transit accommodations on private streets;
- Signal design and timing of all new traffic signals to optimize performance of the road network while providing ample pedestrian crossing time;
- Quantity and location of short- and long-term bicycle parking;
- Design of all private rights-of-way;
- Phasing of needed mitigation and improvements measures;
- Multimodal public access easements on private streets;
- Transportation easements along Main Drive; and

- Access easements for the northern portion of the Main Drive ellipse.

### **Conclusion**

In order to adequately mitigate the transportation impacts of the proposed action as identified in the CTR, the DoS is expected to implement the above mitigations as part of the FMC development. Should you have any questions, please contact Jonathan Rogers, the Case Manager for the project at [jonathan.rogers2@dc.gov](mailto:jonathan.rogers2@dc.gov) or 202-671-3022.

Sincerely,



Jim Sebastian  
Acting Associate Director



**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF TRANSPORTATION**



**d. Policy, Planning and Sustainability Administration**

April 26, 2017

Geoffrey Hunt  
Department of State  
A/OPR/RPM  
HST Room 1264  
Washington, DC 20520-1264

RE: 65% Design Guidelines for the Master Plan for the proposed Foreign Mission Center (FMC) at the former Walter Reed Army Medical Center (WRAMC) and Responses to the Department of State's (DoS) March 16, 2017 letter to DDOT regarding Comprehensive Transportation Review (CTR) comments

Dear Mr. Hunt:

The District Department of Transportation (DDOT) appreciates the opportunity to review the 65% Design Guidelines and provide responses to DoS's March 16, 2017 letter that responds to DDOT's February 14, 2017 comments on the CTR.

**65% Design Guidelines for the Master Plan**

The Guidelines provide a solid foundation to create a high-quality transportation network within the FMC site, although some important revisions are needed as follows:

**Transportation Network Design**

- **Coordinate street designs with the LRA** - Designs for Dahlia Street and Main Drive that continue across the FMC and Local Redevelopment Authority (LRA) properties must be coordinated to ensure safe alignment of travel lanes, bike lanes, tree boxes, and sidewalks. Given the different proposed uses within the rights of way, particularly the lack of parking on the FMC site, DDOT expects the Master Plan to account for transitions between the FMC and LRA cross sections.

- **14<sup>th</sup> Street design** - Changes are needed for the 14<sup>th</sup> Street design to encourage low speeds. As proposed, the separated portion of 14<sup>th</sup> Street features 20 feet of pavement in each direction, which includes a 4 foot shoulder and combined 16 foot travel lane and bike lane. While DDOT understands the separated portion of the street must maintain 20 feet of clearance to qualify as a fire lane, as designed the road is excessively wide and could encourage speeding. DoS should coordinate with DDOT to explore alternate design options that satisfy fire lane requirements while encouraging low speeds. Possible solutions include varying pavement, materials, markings, and textures, and dedicated bicycle facilities.
- **Dahlia Street design** - Dahlia Street west of 14<sup>th</sup> Street should include a minimum 4 foot tree box on the north side of the street.
- **Bicycle lanes** - Bicycle lanes throughout the site should be widened from 4 feet to 5 feet to meet DDOT standards. Text on Page 4-21 calls for 5 foot bicycle lanes but street cross sections show 4 foot lanes.
- **Street Width** - DDOT recommends a 30 foot cartpath (two 5 foot bicycle lanes and two 10 foot travel lanes) for all private streets with two travel lanes, two bicycle lanes, and no parking. 10 foot travel lanes also match the proposed travel lane width on LRA streets.
- **Pedestrian curb ramps** – The Master Plan states that one curb ramps will be provided at each corner of an intersection (Page 4-23). DDOT standards call for two curb ramps at each corner to account each pedestrian movement.
- **Short-term bicycle parking** - The Master Plan states that “no street furnishings fixed or movable” including bike racks will be permitting “on or adjacent to FMC sidewalks” (Page 4-23). Short-term bicycle parking within the streetscape will be important to accommodate bicycle demand for the site. DDOT expects that short-term bicycle parking spaces will be located in easily accessible spaces in close proximity to primary building entrances.

#### Site Access & Design

- **Alaska Avenue/14<sup>th</sup> Street vehicular connection** -The Master Plan states that the 14<sup>th</sup> Street & Alaska Avenue intersection will be closed to vehicular traffic (Page 4-25). Per DDOT’s February 14, 2017 letter, the CTR identifies several impacted intersections not proposed to be mitigated, including 16th Street & Main Drive and Dahlia Street & Alaska Avenue. Impacts at these intersections are caused in large part by the exclusion of a vehicular access point at the 14th Street/Alaska Avenue intersection. Vehicle access at this location is needed to distribute site traffic and reduce impacts at the other access points. The Master Plan should be updated to reflect the vehicular connection at this intersection.

- **Site access approach** - The Master Plan states that “primary access to the chancery shall be from the primary frontage” and defines Main Drive as a primary street. Per DDOT’s February 14, 2017 letter, parcels with access to the DoS street network are expected to provide vehicular site access from such streets and not from Main Drive. Any proposed curb cuts from Main Drive would require DDOT approval and would need to meet DDOT standards.
- **Heritage Tree preservation** - The Master Plan states that “it is recommended that each site plan take creative measures that work towards the preservation of existing Heritage Trees wherever possible” (Page 5-22). Heritage Trees are defined as a tree with a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. DoS should coordinate with DDOT’s Urban Forestry Administration (UFA) to identify Heritage Trees on site and evaluate their condition. Healthy Heritage Trees might be permitted to be relocated only with approval by the Mayor and the Urban Forestry Administration. Accordingly, buildings will be required to be designed such that they avoid conflicts with and preserve non-hazardous Heritage Trees.

#### Public Access & Easements

- **Access & Easements** - The Master Plan should clearly describe the easement arrangements discussed by DoS, LRA, and DDOT (Figure 4.13 and Page 4-12). The Master Plan should be updated to include the following:
  - Include a legend describing the meaning of each color on the map.
  - Denote a public access easement for all streets and sidewalks within the LRA. Maintaining public access except in limited instances of security justification is needed. Per DDOT’s February 14, 2017 letter, DoS should coordinate with DDOT to define a process and establish thresholds for security-related street closures. In addition, if desirable by DDOT or the Washington Metropolitan Area Transit Authority, DoS should allow bus routes and stops on the private streets.
  - Denote the 15 feet public access easement north of the north curblines of Main Drive along the entirety of the DoS property.
  - Maintain the interior of the oval (between the curbs) as a DoS property under DoS maintenance. DDOT will not accept ownership or maintenance responsibility of the interior of the oval.

#### Transportation Management Plan

- **Transportation Management Plan** - The Master Plan states that “all chanceries [shall] provide a Transportation Management Plan to be reviewed by DDOT during chancery design” (Page 5-7 & Page 5-26). Clarify and define the processes through which DDOT would be engaged in the Design Review process and, in particular, the Transportation Demand Management Plan, including level of authority (advisory or approval).

## Public Space Permitting

- **Work in public space will require DDOT public space permits** - All chanceries with frontage on a public street will be required to improve the public space adjacent to the property to current DDOT standards. Any work in public space, including driveways, paving, steps, and ramps must be designed to DDOT standards and will require public space permits from DDOT.

## Responses to DoS's March 16, 2017 Letter

DDOT has reviewed the letter sent by DoS in response to DDOT's February 14, 2017 letter that reviewed the CTR for the FMC development. DDOT and DoS agree on many issues related to the FMC development, although there remains a lack of agreement on several issues as detailed below:

- **Comment 1: Provide a 14<sup>th</sup> Street multimodal connection at Fern Street**

DDOT acknowledges the addition of an option for the site design that includes vehicular access at the 14<sup>th</sup> Street/Alaska Avenue intersection. As this additional access point is an important mitigation for the FMC's impacts, DDOT expects that this option will be constructed. DDOT considers the failure to provide a vehicular connection in this location to be an unmitigated impact.

- **Comment 2: Ensure public access will be maintained on private streets at all times**

DDOT acknowledges that DoS commits to maintaining public access on all streets within the FMC except in limited instances where security justifies temporary closures. Please share with DDOT the proposed process and thresholds governing street closures.

- **Comment 3: Ensure site access meets DDOT standards**

DDOT acknowledges DoS's commitment to meet DDOT standards with respect to site access. Please address DDOT's detailed comments above related to conceptual site access in the 65% Design Guidelines for the Master Plan.

- **Comment 4: Design private streets to DDOT standards**

DDOT acknowledges DoS's commitment to construct private streets to DDOT standards. Please address DDOT's detailed comments above related to street design in the 65% Design Guidelines for the Master Plan.

- **Comment 5: Dahlia Street/Alaska Avenue mitigation**

DDOT acknowledges DoS's commitment to install a 100-foot right turn lane and to maintain the current orientation of the intersection.

- **Comment 6: Main Drive mitigation**

DDOT acknowledges DoS's commitment to install the westbound right turn lane on Main Drive at 16<sup>th</sup> Street if it is not in place by the time the FMC is 50 percent built out.

- **Comment 7: 16<sup>th</sup> Street/Alaska Avenue mitigation**

DDOT acknowledges DoS's commitment to install the northbound right turn lane on 16<sup>th</sup> Street at Alaska Avenue if it is not in place by the time the FMC is 50 percent built out.

- **Comment 8: 16<sup>th</sup> Street/Sherril Drive/Aspen Street mitigation**

DDOT identified a second Capital Bikeshare station as a mitigation in lieu of physical improvements at this intersection. DDOT expects that a second station will be provided in order to address site impacts. DDOT considers the failure to provide a second station to be an unmitigated impact to the intersection.

- **Comment 9: Transportation Demand Management – Bicycle facilities**

DDOT acknowledges DoS's "expectation" that foreign missions will comply with District zoning regulations requiring bicycle facilities (Chapter 8 of the 2016 Zoning Regulations).

- **Comment 10: Transportation Demand Management – Two Capital Bikeshare stations**

As noted above, DDOT identified a second Capital Bikeshare station as a mitigation in lieu of physical improvements at 16<sup>th</sup> Street/Sherril Drive/Aspen Street. DDOT expects that a second station be provided in order to address site impacts. DDOT considers the failure to provide a second station to be an unmitigated impact to the intersection.

- **Comment 11: Transportation Demand Management – Transportation Management Plan**

As noted in DDOT's comments regarding the 65% Design Guidelines for the Master Plan, DoS should clarify and define the processes through which DDOT would be engaged in the Design Review process and, in particular, the Transportation Demand Management Plan, including level of authority (advisory or approval).

DDOT looks forward to continued coordination with DoS to address and review DoS responses to the comments above. Should you have any questions, please contact Jonathan Rogers, the Case Manager for the project at [jonathan.rogers2@dc.gov](mailto:jonathan.rogers2@dc.gov) or 202-671-3022.

Sincerely,



Jim Sebastian

Acting Associate Director



**TECHNICAL MEMORANDUM**

**To:** Anna Chamberlin  
Jonathan Rogers  
Sam Zimbabwe  
DDOT  
DDOT  
DDOT

**CC:** Geoffrey Hunt  
Jonathan Cohn  
Grace Choi  
Matthew Sandelands  
Department of State  
Department of State  
Department of State  
Department of State

**From:** Jim Watson, AICP PTP  
Erwin Andres

**Date:** June 26, 2017

**Subject:** 65% Design Guidelines for the Master Plan for the proposed Foreign Mission Center (FMC) at the former Walter Reed Army Medical Center (WRAMC) and responses to the Department of State's (DoS) March 16, 2017 letter to DDOT regarding Comprehensive Transportation Review (CTR) comments – Response to DDOT Comments

***Introduction***

This memorandum summarizes the responses to comments provided on April 26, 2017 by the District Department of Transportation (DDOT) that addressed the 65% Design Guidelines for the Master Plan for the proposed Foreign Mission Center (FMC) at the former Walter Reed Army Medical Center (WRAMC) and the Department of State's (DoS) March 16, 2017 letter to DDOT regarding Comprehensive Transportation Review (CTR) comments (Attachment A).

***April 26, 2017 DDOT Comment Responses******65% Design Guidelines for the Master Plan Comments***

**Comment 1:** **Transportation Network Design – Coordinate Street designs with the LRA: Designs for Dahlia Street and Main Drive that continue across the FMC and Local Redevelopment Authority (LRA) properties must be coordinated to ensure safe alignment of travel lanes, bike lanes, tree boxes, and sidewalks. Given the different proposed uses within the rights of way, particularly the lack of parking on the FMC site, DDOT expects the Master Plan to account for transitions between the FMC and LRA cross sections.**

Response 1: Agreed and Noted. The Master Plan will address the transition between the FMC and LRA cross sections regarding the safety and general alignment of travel lanes, bike lanes, tree boxes, and sidewalks.

**Comment 2:** **Transportation Network Design – 14<sup>th</sup> Street design: Changes are needed for the 14th Street design to encourage low speeds. As proposed, the separated portion of 14th Street features 20 feet of pavement in each direction, which includes a 4 foot shoulder and combined 16 foot travel lane and bike lane. While DDOT understands the separated portion of the street must maintain 20 feet of clearance to qualify as a fire lane, as designed the road is excessively wide and could encourage speeding. DoS should coordinate**

**with DDOT to explore alternate design options that satisfy fire lane requirements while encouraging low speeds. Possible solutions include varying pavement, materials, markings, and textures, and dedicated bicycle facilities.**

Response 2: Noted. Revisions to the design of 14<sup>th</sup> Street will be explored in the design phase to encourage lower speeds and coordinated with DDOT through permitting.

**Comment 3: Transportation Network Design – Dahlia Street Design: Dahlia Street west of 14<sup>th</sup> Street should include a minimum 4 foot tree box on the north side of the street.**

Response 3: The details of this streetscape feature will be evaluated/explored further in the design phase. However, the addition of a four (4) foot tree box on the north side of Dahlia Street west of 14<sup>th</sup> Street would significantly alter the landscape in front of the adjacent Memorial Chapel. Due to the topography, there is not enough room for a tree box and the existing entry stairs. As such, a four (4) foot tree box on the north side of Dahlia Street west of 14<sup>th</sup> Street has not been included in the design thus far.

**Comment 4: Transportation Network Design – Bicycle lanes: Bicycle lanes throughout the site should be widened from 4 feet to 5 feet to meet DDOT standards. Text on Page 4-21 calls for 5 foot bicycle lanes but street cross sections show 4 foot lanes.**

Response 4: Noted and agreed. The cross sections will be updated to reflect the 5 foot bicycle lanes shown on the plans.

**Comment 5: Transportation Network Design – Street Width: DDOT recommends a 30 foot cartpath (two 5 foot bicycle lanes and two 10 foot travel lanes) for all private streets with two travel lanes, two bicycle lanes, and no parking. 10 foot travel lanes also match the proposed travel lane width on LRA streets.**

Response 5: Noted. The details of these features will be evaluated/explored in the design phase.

**Comment 6: Transportation Network Design – Pedestrian curb ramps: The Master Plan states that one curb ramp will be provided at each corner of an intersection (Page 4-23). DDOT standards call for two curb ramps at each corner to account each pedestrian movement.**

Response 6: Noted. The Master Plan will be updated to reflect the DDOT standard.

**Comment 7: Transportation Network Design – Short-term bicycle parking: The Master Plan states that "no street furnishings fixed or movable" including bike racks will be permitting "on or adjacent to FMC sidewalks" (Page 4-23). Short-term bicycle parking within the streetscape will be important to accommodate bicycle demand for the site. DDOT expects that short-term bicycle parking spaces will be located in easily accessible spaces in close proximity to primary building entrances.**

Response 7: Noted. The location of short-term bicycle parking will be determined as a part of the design for each chancery lot.

**Comment 8: Site Access and Design – Alaska Avenue/14<sup>th</sup> Street vehicular connection: Alaska Avenue intersection will be closed to vehicular traffic (Page 4-25). Per DDOT's February 14, 2017 letter, the CTR identifies several impacted intersections not proposed to be mitigated, including 16th Street & Main Drive and Dahlia Street & Alaska Avenue. Impacts at these intersections are caused in large part by the exclusion of a vehicular access point at the 14th Street/ Alaska Avenue intersection. Vehicle access at this location is**

**needed to distribute site traffic and reduce impacts at the other access points. The Master Plan should be updated to reflect the vehicular connection at this intersection.**

Response 8: Noted regarding the comments associated with 14th Street and Alaska Avenue. Upon DDOT's request, the team developed a Master Plan option for a vehicular connection at the intersection of 14th Street/Alaska Avenue intersection for further review and included it in the Supplemental Draft Environmental Impact Statement for public comment. The public overwhelmingly objected to the 14th street connection to Alaska Avenue, it was by far the largest topic of the public comments received, even a neighborhood community letter was signed by residents supporting the cul-de-sac option. Gorove Slade took a look at the potential traffic increase if 14th Street were connected to Alaska, and as expected there would be increase of traffic at that location, verifying the public's concern about increased traffic. Additionally, the cul-de-sac option provides for more leasable land to generate the income to pay for the infrastructure. The cul-de-sac design is also based on the historic turn-around originally constructed for Building 54. The new owners of Building 54, Children's National Medical Hospital supports the cul-de-sac design. The cul-de-sac design is more marketable and offers more attractive security appeal to Foreign Missions than does the street frontage connecting to Alaska. The cul-de-sac design has the least impacts on both the natural and community resources. For all of these reasons, DOS will be moving forward with the cul-de-sac design as the selected option.

**Comment 9: Site Access and Design – Site access approach: The Master Plan states that "primary access to the chancery shall be from the primary frontage" and defines Main Drive as a primary street. Per DDOT's February 14, 2017 letter, parcels with access to the DoS street network are expected to provide vehicular site access from such streets and not from Main Drive. Any proposed curb cuts from Main Drive would require DDOT approval and would need to meet DDOT standards.**

Response 9: Agreed and Noted. Access to some parcels in the southern portion of the FMC is only available from Main Drive. Should access to Main Drive be necessary for these parcels, DOS will work with DDOT regarding DDOT standards for approval of any proposed curb cuts.

**Comment 10: Site Access and Design – Heritage Tree preservation: The Master Plan states that "it is recommended that each site plan take creative measures that work towards the preservation of existing Heritage Trees wherever possible" (Page 5-22). Heritage Trees are defined as a tree with a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. DoS should coordinate with DDOT's Urban Forestry Administration (UFA) to identify Heritage Trees on site and evaluate their condition. Healthy Heritage Trees might be permitted to be relocated only with approval by the Mayor and the Urban Forestry Administration. Accordingly, buildings will be required to be designed such that they avoid conflicts with and preserve non-hazardous Heritage Trees.**

Response 10: Noted. Efforts will be taken to design buildings such that they avoid conflicts with and preserve non-hazardous Heritage Trees based on advisory comments that DDOT offers.

**Comment 11: Public Access and Easement – Access and Easements: The Master Plan should clearly describe the easement arrangements discussed by DoS, LRA, and DDOT (Figure 4.13 and Page 4-12). The Master Plan should be updated to include the following:**

- Include a legend describing the meaning of each color on the map.

- **Denote a public access easement for all streets and sidewalks within the LRA.**
- **Maintaining public access except in limited instances of security justification is needed.**
- **Per DDOT's February 14, 2017 letter, DoS should coordinate with DDOT to define a process and establish thresholds for security-related street closures. In addition, if desirable by DDOT or the Washington Metropolitan Area Transit Authority, DoS should allow bus routes and stops on the private streets.**
- **Denote the 15 feet public access easement north of the north curblin e of Main Drive along the entirety of the DoS property.**
- **Maintain the interior of the oval (between the curbs) as a DoS property under DoS maintenance. DDOT will not accept ownership or maintenance responsibility of the interior of the oval.**

Response 11: Noted and Agreed. The Master Plan will be updated to include the easement arrangements noted above.

**Comment 12:** Transportation Management Plan – Transportation Management Plan: The Master Plan states that "all chanceries [shall] provide a Transportation Management Plan to be reviewed by DDOT during chancery design" (Page 5-7 & Page 5-26). Clarify and define the processes through which DDOT would be engaged in the Design Review process and, in particular, the Transportation Demand Management Plan, including level of authority (advisory or approval).

Response 12: When the application for the design of each chancery lot is submitted to NCPC, the application (including transportation management plans) will be sent by NCPC to the District Office of Planning to coordinate the Municipal Interest Report, which should include advisory comments from DDOT.

**Comment 13:** Public Space Permitting – Work in public space will require DDOT public space permits: All chanceries with frontage on a public street will be required to improve the public space adjacent to the property to current DDOT standards. Any work in public space, including driveways, paving, steps, and ramps must be designed to DDOT standards and will require public space permits from DDOT.

Response 13: Agreed and Noted. All work done along a public street will follow current DDOT standards and obtain public space permits from DDOT.

### *Responses to DOS's March 16, 2017 Letter Comments*

**Comment 1:** Provide a 14<sup>th</sup> Street multimodal connection at Fern Street: DDOT acknowledges the addition of an option for the site design that includes vehicular access at the 14<sup>th</sup> Street/ Alaska Avenue intersection. As this additional access point is an important mitigation for the FMC's impacts, DDOT expects that this option will be constructed. DDOT considers the failure to provide a vehicular connection in this location to be an unmitigated impact.

Response 1: Noted regarding the comments associated with 14<sup>th</sup> Street and Alaska Avenue. The Master Plan includes an option for a vehicular connection at the intersection of 14<sup>th</sup> Street/Alaska Avenue intersection that is under review. However, 14<sup>th</sup> Street does not intersect Fern Street (as suggested in the first sentence of the comment) and, thus, no improvements will be made to connect the two.

**Comment 2:** **Ensure public access will be maintained on private streets at all times:** DDOT acknowledges that DoS commits to maintaining public access on all streets within the FMC except in limited instances where security justifies temporary closures. Please share with DDOT the proposed process and thresholds governing street closures.

Response 2: While the closure of FMC streets is not foreseen to be likely, OFM reserves the right to close streets due to crisis, emergency, or security issues.

**Comment 3:** **Ensure site access meets DDOT standards:** DDOT acknowledges DoS's commitment to meet DDOT standards with respect to site access. Please address DDOT's detailed comments above related to conceptual site access in the 65% Design Guidelines for the Master Plan.

Response 3: Responses to DDOT comments are provided above.

**Comment 4:** **Design private streets to DDOT standards:** DDOT acknowledges DoS's commitment to construct private streets to DDOT standards. Please address DDOT's detailed comments above related to street design in the 65% Design Guidelines for the Master Plan.

Response 4: Responses to DDOT comments are provided above.

**Comment 5:** **Dahlia Street/Alaska Avenue mitigation:** DDOT acknowledges DoS's commitment to install a 100-foot right turn lane and to maintain the current orientation of the intersection.

Response 5: Noted.

**Comment 6:** **Main Drive mitigation:** DDOT acknowledges DoS's commitment to install the westbound right turn lane on Main Drive at 16th Street if it is not in place by the time the FMC is 50 percent built out.

Response 6: Noted.

**Comment 7:** **16<sup>th</sup> Street/Alaska Avenue mitigation:** DDOT acknowledges DoS's commitment to install the northbound right turn lane on 16th Street at Alaska Avenue if it is not in place by the time the FMC is 50 percent built out.

Response 7: Noted.

**Comment 8:** **16<sup>th</sup> Street/Sherrill Drive/Aspen Street Mitigation:** DDOT identified a second Capital Bikeshare station as a mitigation in lieu of physical improvements at this intersection. DDOT expects that a second station will be provided in order to address site impacts. DDOT considers the failure to provide a second station to be an unmitigated impact to the intersection.

Response 8: Only one Bikeshare station is planned to be provided on the campus itself. No other Bikeshare stations will be provided.

**Comment 9:** **Transportation Demand Management – Bicycle facilities:** DDOT acknowledges DoS's "expectation" that foreign missions will comply with District zoning regulations requiring bicycle facilities (Chapter 8 of the 2016 Zoning Regulations).

Response 9: Noted.

**Comment 10:** **Transportation Demand Management – Two Capital Bikeshare Stations:** As noted above, DDOT identified a second Capital Bikeshare station as a mitigation in lieu of physical improvements at 16th Street/Sherrill

**Drive/Aspen Street. DDOT expects that a second station be provided in order to address site impacts. DDOT considers the failure to provide a second station to be an unmitigated impact to the intersection.**

Response 10: Only one Bikeshare station is planned to be provided on the campus itself. No other Bikeshare stations will be provided.

**Comment 11: Transportation Demand Management – Transportation Management Plan: As noted in DDOT's comments regarding the 6S% Design Guidelines for the Master Plan, DoS should clarify and define the processes through which DDOT would be engaged in the Design Review process and, in particular, the Transportation Demand Management Plan, including level of authority (advisory or approval).**

Response 11: Noted. DDOT will have the opportunity to review and offer advisory comment on the transportation management plan for each chancery during the first step of the design review process for the chanceries.

**TECHNICAL MEMORANDUM**

**To:** Anna Chamberlin  
Jonathan Rogers  
Sam Zimbabwe  
DDOT  
DDOT  
DDOT

**CC:** Geoffrey Hunt  
Jonathan Cohn  
Grace Choi  
Matthew Sandelands  
Department of State  
Department of State  
Department of State  
Department of State

**From:** Maris Fry, P.E.  
Erwin Andres, P.E.

**Date:** August 11, 2017

**Subject:** 65% Design Guidelines for the Master Plan for the proposed Foreign Mission Center (FMC) at the former Walter Reed Army Medical Center (WRAMC) – Response to Additional DDOT Comments

***Introduction***

This memorandum summarizes the responses to comments raised at the July 12, 2017 DDOT follow-up meeting addressing the 65% Design Guidelines for the Master Plan for the proposed Foreign Mission Center (FMC) at the former Walter Reed Army Medical Center (WRAMC).

***DDOT Comment Responses***

Based on the discussions at the July 12 meeting, the outstanding DDOT comments, and subsequent DOS responses are as follows:

**Comment 1: DDOT opposes the cul-de-sac design option along 14<sup>th</sup> Street and prefers a connection to Alaska Avenue.**

Response 1: The cul-de-sac option is the only viable access alternative that works for DOS based on several reasons that include marketability, resource implications, historical consistency, and maximizing value. These reasons are further detailed in the EYP technical memorandum included as an attachment.

The team had developed a Master Plan option for a vehicular connection at the intersection of 14<sup>th</sup> Street and Alaska Avenue, which was included in the Supplemental Draft Environmental Impact Statement for public comment. The public overwhelmingly objected to the 14<sup>th</sup> Street connection to Alaska Avenue as it would result in increased traffic through the adjacent neighborhood. Alternatively, the cul-de-sac option results in more reliance on typical commuter corridors. Although the cul-de-sac design option increases the amount of traffic at the other FMC access points, there are not significant repercussions to commuting traffic as a result of the cul-de-sac. The majority of capacity issues arise along the side street approaches within the FMC site itself and will be mitigated by DOS.

**Comment 2: Given's DDOT's position regarding the 14<sup>th</sup> St. cul-de-sac option, DDOT requested additional mitigation measures to address potential impacts.**

Response 2: As requested by DDOT, Gorove/Slade completed an additional review of the vehicular capacity analysis results of the FMC. Based on the revised version of the FMC Comprehensive Transportation Review (CTR) performed by Gorove/Slade in March of 2017, a subsequent Comment Response Memorandum submitted to DDOT in June of 2017, and comments raised at the July 12 DDOT meeting, DOS is committed to the following mitigation measures as summarized on **Figure 1 (in red)**:

- *Dahlia Street & Alaska Avenue*  
As outlined in the revised FMC CTR, **DOS has committed to install a 100' westbound right-turn lane and to maintain the current orientation of the intersection.**
- *16<sup>th</sup> Street & Alaska Avenue*  
Based on the revised FMC CTR, and follow-up conversations with DDOT, **DOS has committed to install the northbound right-turn lane on 16<sup>th</sup> Street at Alaska Avenue if it is not in place by the time the FMC is 50 percent built out.**
- *16<sup>th</sup> Street & Main Drive*  
Based on the revised FMC CTR, and follow-up conversations with DDOT, **DOS has committed to install the westbound right-turn lane on Main Drive at 16<sup>th</sup> Street if it is not in place by the time the FMC is 50 percent built out.**
- *16<sup>th</sup> Street & Aspen Street/Sherrill Drive*  
In the revised FMC CTR, Gorove/Slade proposed a 150' southbound right-turn lane and signal retimings to mitigate the intersection. Based on further discussions with DDOT and to avoid the need to acquire land from NPS to complete this mitigation, **DOS has committed to mitigating the impacts to this intersection by funding the construction and one year's operations costs of a Capital Bikeshare station on the FMC campus, in lieu of the recommended physical improvement.**
- *16<sup>th</sup> Street & Van Buren Street*  
The FMC development triggers mitigations at additional intersections; however, the majority of these intersections will be upgraded and improved as a result of the LRA redevelopment (as shown in blue in Figure 1). The only intersection in which the FMC and LRA developments are not proposing mitigations is at the intersection of **16<sup>th</sup> Street and Van Buren Street**. It is important to note that this is an existing condition that will continue with future redevelopment of WRAMC.

Potential mitigations measures at this intersection are summarized below; however, they have operational implications. Therefore, DDOT would need to determine the appropriate mitigation measure for this intersection:

- The revised FMC CTR outlined the potential improvement of removing the signal along the eastbound approach of Van Buren Street, while keeping the signal along the offset westbound approach, to eliminate the need for a split phase signal. Although this would reduce the delay significantly at this intersection, it may result in the need for left-turn restrictions from Van Buren Street given the existing offset geometry. This section of Van Buren Street dead-ends west of 16<sup>th</sup> Street so there is currently no other egress outside of 16<sup>th</sup> Street. As such, turn

restrictions may not be a feasible option at this location as it could result in residents living on this section of Van Buren Street to perform circuitous circulation movements.

- Another potential improvement involves elimination of the split phase signal timing, while maintaining signalization of both side streets. However, this would result in the need for turn restrictions along both side streets given the offset geometry. Turn restrictions along the side streets may not be considered an acceptable solution to the residents along these streets given the amount of left turns observed during the existing traffic counts.
- A third potential improvement involves reducing the amount of green time allocated to the side streets; however, this involves reducing the allowable minimum green time for each side street. Although the vehicular capacity analysis results indicate that the side streets could adequately operate with less green time, the minimum green time may be dictated by pedestrian crossing times rather than vehicular capacity. As such, reducing green time allocated to the side streets may result in implications to the non-auto movements through the intersection.

Understanding that DDOT requires additional mitigation to address the impacts of the cul-de-sac option, DOS is committed to the following **additional mitigation measures**:

- *Additional Capital Bikeshare Station*

As stated above, DOS has committed to mitigating the impacts to the intersection of 16<sup>th</sup> Street & Aspen Street by funding the construction and one year's operations costs of a Capital Bikeshare station on the FMC campus, in lieu of the recommended physical improvement at the intersection. In addition to the initial Capital Bikeshare station, **DOS is committed to fund the construction and one year's operations costs of a 2<sup>nd</sup> Capital Bikeshare station.** DDOT may choose to supplement the existing Capital Bikeshare station at the Takoma Metrorail station or to locate this 2<sup>nd</sup> station in the neighborhood where it would benefit FMC employees and guests.

- *Integration of Physical TDM Elements into the FMC Design Guidelines*

DOS has previously commented that it cannot require TDM elements to be implemented for the chanceries that would be located within the FMC. However, **DOS is committed to introduce physical TDM requirements that will be required as part of the Design Guidelines.** Specifically, the Design Guidelines for the FMC will include bicycle parking requirements that are consistent with the new ZR 16 requirements for bicycle facilities. As such, each foreign mission will be held to the same standard for bicycle parking as other developments in the District. For chanceries, this amounts to 1 (one) long-term bicycle parking space for each 5,000 square feet and 1 (one) short-term bicycle parking space for 40,000 square feet.

Additionally, the impacts that were identified in the revised FMC CTR represent the worst-case scenario of a 1:1 parking ratio for employees. The potential for this amount of parking to actually be built by the various chanceries will not be consistent throughout the FMC because of the significant cost associated with structured parking. Given this condition, the overall vehicular trip generation and impacts are expected to be conservatively overstated. To conform to the expectations of foreign missions and DOS requests, the FMC Master Plan and Design Guidelines will allow for a ratio of one parking space per foreign mission employee. However, these employee parking spaces shall be in structured parking

located within the footprint of each new chancery, with surface parking limited to 4 to 6 spaces per chancery to accommodate short-term visitors. At the ICC, the structured parking is below-grade under the chanceries and it is expected that chanceries at the FMC will follow this same format. The exceptions to this requirement are at existing buildings (i.e. Building 40 and 41) where it is not possible to construct new parking under the existing building. In these instances, structured parking concealed from view will still be required. The other exception is Building 56 where existing surface parking of about 12 spaces will be allowed to remain.

The primary challenge with these requirements is that structured parking is significantly more expensive than surface parking. This expense is compounded by the fact that for these chanceries, the parking will also need to be underground (save for the previously mentioned exceptions). The cost for a surface parking space is in the range of \$3,000 to \$8,000 per space. Whereas the cost for a parking space in structured parking below-grade is in the range of \$40,000 to \$60,000 per space, which is significantly greater than the cost of surface parking. The primary way for chanceries to reduce this added construction cost is to support mass transit and alternative transit options for both their employees and visitors. During the design process for the development of each chancery lot, each foreign mission will be highly encouraged to provide a Transportation Demand Management (TDM) plan that will include incentives to promote alternative commuting options that include transit, biking, and carpooling incentives to reduce structured parking requirements for that chancery.

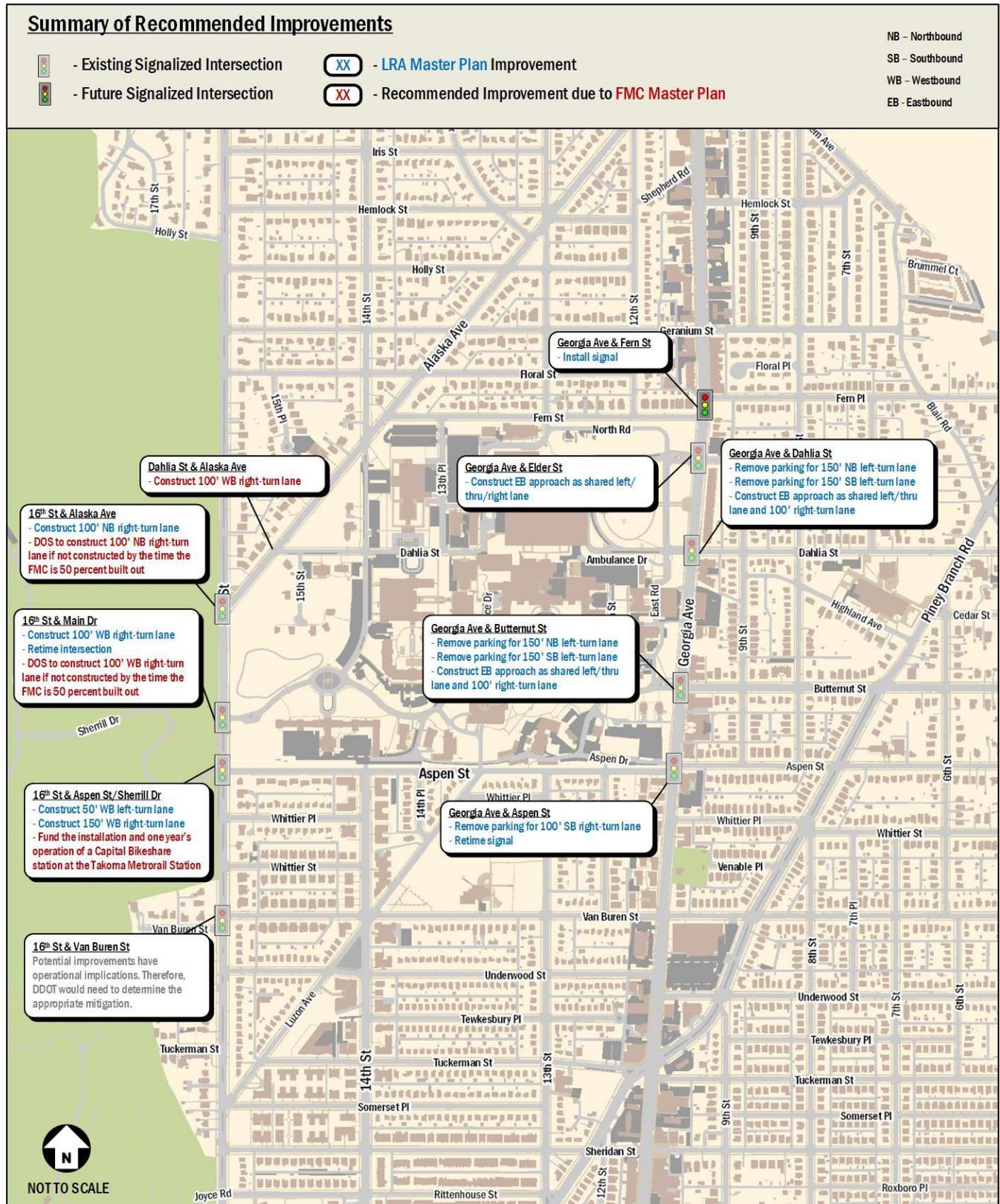


Figure 1: Summary of Recommended Improvements



## **TECHNICAL ATTACHMENTS**





July 28, 2017

## **Foreign Missions Center (FMC)**

### **Summary of Consulting Agency & Public Comments regarding 14<sup>th</sup> Street Connection at Alaska Avenue & DOS Selection of Cul-de-Sac Option**

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#### **EXECUTIVE SUMMARY**

##### **14<sup>th</sup> Street Layout Options Assessment: Cul-de-Sac Option Selected**

Upon DDOT's request, the team developed a Master Plan option for a vehicular connection at the intersection of 14<sup>th</sup> Street/Alaska Avenue intersection for further review and included it in the Supplemental Draft Environmental Impact Statement for public comment. The public overwhelmingly objected to the 14<sup>th</sup> street connection to Alaska Avenue, it was by far the largest topic of the public comments received, even a neighborhood community letter was signed by residents supporting the cul-de-sac option. Gorove Slade took a look at the potential traffic increase if 14<sup>th</sup> Street were connected to Alaska, and as expected there would be increase of traffic at that location, verifying the public's concern about increased traffic. Additionally, the cul-de-sac option provides for more leasable land to generate the income to pay for the infrastructure. The cul-de-sac design is also based on the historic turn-around originally constructed for Building 54. The new owners of Building 54, Children's National Medical Hospital supports the cul-de-sac design. The cul-de-sac design is more marketable and offers more attractive security appeal to Foreign Missions than does the street frontage connecting to Alaska. The cul-de-sac design has the least impacts on both the natural and community resources. For all of these reasons, DOS will be moving forward with the cul-de-sac design as the selected option.

##### **Design Approach for Cul-de-sac Option**

14<sup>th</sup> Street is off-set from current alignment for two reasons. First reason is to create lots large enough to accommodate a chancery and maintain a 50-foot vegetative buffer along Alaska Avenue. The purpose of the vegetative buffer is to preserve some the significant trees, preserve the landscaped separation of the WRAMC from the adjacent residential neighborhood, and create privacy for the rear yards of the prospective chanceries. The second reason is to provide adequate stand-off distance from street to Chapel (Building 57) that will be a DOS facility.

There will be pedestrian and bicycle access to Alaska Avenue from the cul-de-sac. This access point will also accommodate underground utilities such as electrical, telecommunications, natural gas and water from Alaska Avenue. These utilities are to support the development of the FMC and could be available to CNMC (DOS to confirm). Because of the limited dimension, the impact to the fence, a contributing resource to the historic district, will be minimal.

The cul-de-sac's location and size are based on historic images of the original drop-off at Building 54. While location and size are designed to meet the needs of the FMC lots, the cul-de-sac is centered on the original entrance of the Building 54 and setback a similar distance from the entrance as the original drop-off was. The new owners of the Building 54, CNMC, endorse this design approach.

## DESIGN CONSIDERATIONS ANALYZED

### Supplemental Draft Environmental Impact Statement

The Supplemental Draft Environmental Impact Statement provided two options for the intersection of the 14th Street and Alaska Avenue at the Foreign Missions Center (FMC). One option (SDEIS Option C) terminates vehicular access at 14th Street with a cu-d-sac within the FMC, pedestrian and bicycle access will be allowed to connect to Alaska Avenue via a DOS right-of-way north of the cul-de-sac. The other option (SDEIS Option D) connects 14th Street from the FMC to Alaska Avenue for vehicular, pedestrian and bicycle access. The Department of State prefers the cul-de-sac option but added the Alaska Street connection option to the Supplemental Draft Environmental Impact Statement to seek public comments regarding that option in response to comments from the Consulting Agencies (CFA & NCPC).



Fig. 1: FMC SDEIS - Option C  
14<sup>th</sup> Street terminates at cul-d-sac



Fig 2: FMC SDEIS - Option D  
14<sup>th</sup> Street and Alaska Ave intersection

**Exhibit 2.4 – 14th Street Layout Options Assessment Criteria**

<i>Assessment Criteria</i>	<i>Cul-de-sac option</i>	<i>Through street option</i>
Traffic patterns	Does not reduce traffic at other entrances. Addresses neighborhood concerns expressed in DEIS comments about avoiding increased traffic on 14th Street north of the FMC.	Adds another vehicular entrance/egress to FMC, potentially decreasing traffic at other entrances. Does not address neighborhood concerns expressed in DEIS comments about avoiding increased traffic on 14th Street north of the FMC.
Street frontage	Creates unique condition with strong appeal for members of foreign mission community seeking privacy for chanceries.	Provides straight street frontage to foreign missions.
FMC/neighborhood connection	Does not provide urban street connectivity.	Creates more open and welcoming presence of FMC to adjacent neighborhood.
Marketability	Maximizes marketability.	Results in loss of portion of marketable lot.
Historic Impacts	Avoids impact to contributing historic resource fence. Consistent with development history of WRAMC during period of historic significance of interrupting continuity of urban street grid.	Requires alteration of wrought iron fence, resulting in adverse impact to this contributing historic resource. Disregards historic location of turnaround in front of Building 54.
Funding	Would be constructed and maintained by DOS.	Requires DOS coordination with CNMC. CNMC would need to construct and maintain this street connection.

*Excerpt from Supplemental Draft EIS issued in March 2017*

**Leasable Property / Marketability**

The development and maintenance of the DOS portions of the campus will be funded as cost neutral to the Federal Government. The primary funding will be through the lease of lots to the foreign missions. The area of the top two lots the encompass the area affected is approximately 1.72 acres with the cul-de-sac and approximately 1.56 acres or a 0.16 acre difference leasable land. The inclusion of 14<sup>th</sup> Street connection to Alaska Avenue will decrease the leasable land and result in the loss of approximately \$1.12 million in revenue to fund DOS’ development and maintenance of the streets, sidewalks and associated landscapes (see figures 1 and 2, above).

One of the advantages of the FMC at Walter Reed is variety of site conditions that occur over such a small area. The historic Main Drive and 16<sup>th</sup> Street frontages provide very prominent and public sites for future chanceries. Whereas Dahlia Street frontages provides sites that can more closely relate to the other developments on the former WRAMC. With the cul-de-sac option, the sites on 14<sup>th</sup> Street north of Dahlia Street provide more private frontages for foreign missions’ that prefer their chanceries be in more secluded. The continuation of 14<sup>th</sup> Street will eliminate some of the variety of street frontages available in the current master plan proposal.

**Resource implications (natural and community) for the cul-de-sac versus the through-street option:**

The resource implications of the cul-de-sac vs. through street option are presented in SDEIS Exhibit 2.4. Section 2.3.2 has been revised to state that the cul-de-sac option has been selected as a component of the Preferred Alternative in the FEIS because it:

- 1) Addresses neighborhood concerns about avoiding increased traffic on 14<sup>th</sup> Street north of the FMC,
- 2) Avoids impact to the contributing historic resource fence and is consistent with the development history of the WRAMC during the period of historic significance of interrupting continuity of the urban street grid,
- 3) Maximizes funding and schedule feasibility because it would be constructed and maintained by DOS, not an external partner, and
- 4) Maximizes marketability by providing larger lot sizes and creating a unique condition with strong appeal for members of the foreign mission community seeking privacy for chanceries.

### Building 54 – Historic vehicular turnaround at West Entry

The cul-de-sac option avoids impact to the contributing historic resource wrought iron perimeter fence and is consistent with the development history of WRAMC during the period of historic significance of interrupting continuity of urban street grid by using the same location as the historic turnaround in front of West Entrance to Building 54. The new owner of Building 54, Children’s National Medical Center, endorses this design.

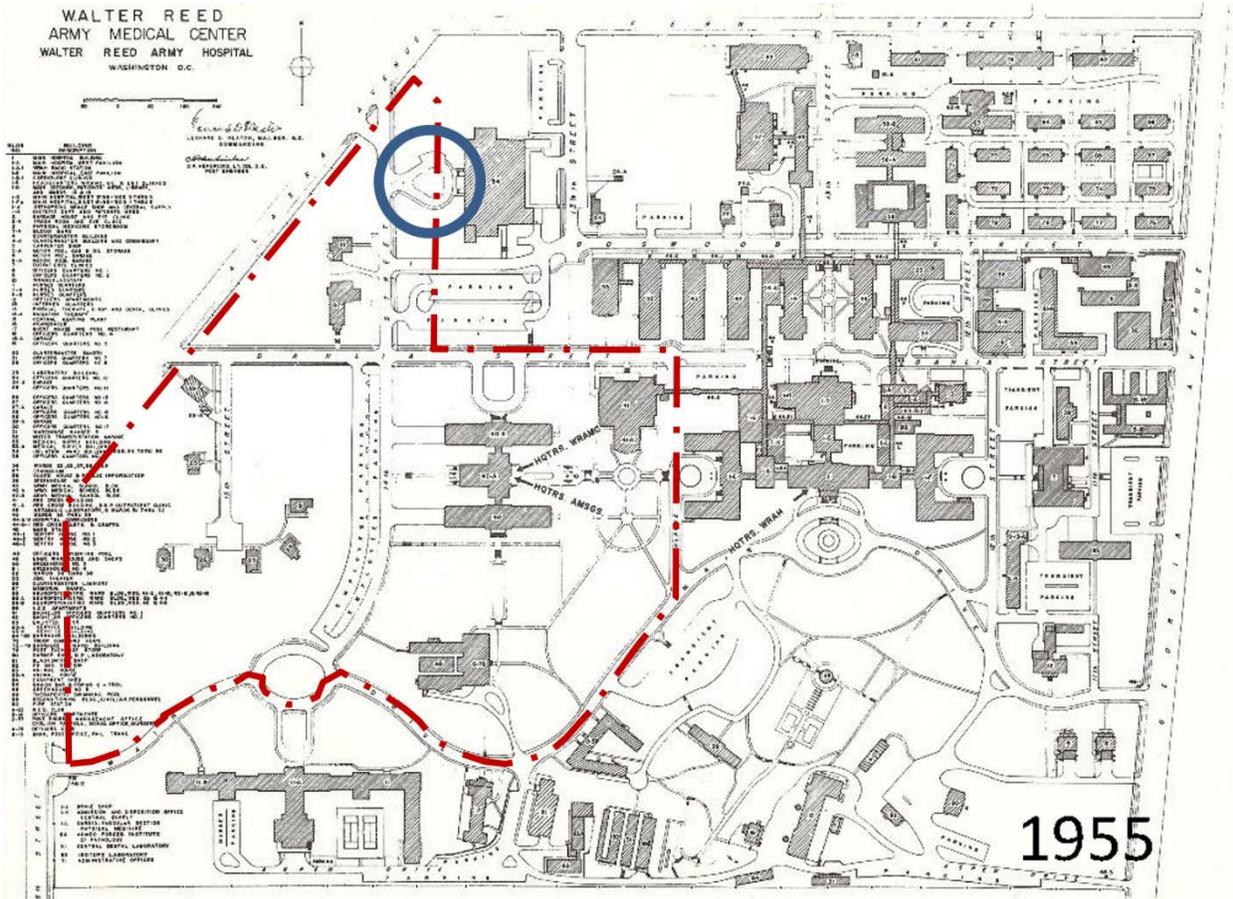


Fig. 3: Walter Reed Army Medical Center Campus Map (c. 1955)  
FMC property is highlighted in red. Drop-off, cul-de-sac, at entrance of Building 54 is circled in blue

## **Results of Public Hearing and Comments**

During the review of the master plan and SDEIS by consulting agencies, there were several opinions expressed about the planning options. CFA, DDOT and NCPC recommended that 14<sup>th</sup> Street connect to Alaska Avenue. CFA cited this option as an urban planning move. DDOT cited the additional entrance to the FMC would reduce traffic at other entrances. DDOT's comments were shared via ongoing coordination with this agency and through the NCPC preliminary design review process. NCPC commissioners' comments were similar to CFA about extending the urban grid and the additional entrance would create an open campus. In their written remarks, the EPA region III expressed concerns that the planning alternative that proposed the intersection of 14<sup>th</sup> and Alaska could have "potential negative impacts."

As part of the SDEIS public review and comment period, there was an Open House and Public Hearing on April 20, 2017. During the Open House comments were collected. There were many comments about traffic and transportation concerns. While a majority of the comments focused on concerns about parking spilling into the neighborhood, there were several comments related to 14th Street access at Alaska Avenue. Of the seven comments related to this proposed intersection, six expressed concerns about increased traffic in the neighborhoods north of the Walter Reed campus and encourage that the alternatives that did not include the proposed intersection of 14th and Alaska.

At Public Hearing, representative from Shepherd Park Citizens Association support the plan alternatives that terminate 14th Street with a cul-de-sac in front the AFIP. They are concerned about traffic created from the entire re-development WRAMC using local streets such as 14th Street. In addition, they prefer that WMATA traffic be restricted to Main Drive. Also at the Public Hearing, several local residents spoke out personally about the proposed intersection at 14th and Alaska. Their general concern is that 16th Street and Georgia Avenue are heavily used commuter routes. Allowing open access through the campus may create opportunities for commuters to use 14th Street as a means for getting out of traffic and thus increasing traffic on 14th Street north of the FMC, which is perceived as a local or neighborhood street. Suggestions range from preferring planning alternatives that terminate the section of 14th Street within the FMC to providing commuter related movement restrictions at the proposed intersection.

Of all of the comments received during the review and comment period, there were 20 comments related to the intersection of 14th Street and Alaska Avenue. Five of these comments were for the proposed intersection, and 12 were against the proposed intersection. Below is a tabular summary of the comments concerning the planning alternatives relative to the 14th Street and Alaska Avenue intersection.

With the exception of the EPA, Region III and Children's National Medical Center, a majority of the comments against the proposed intersection were from neighbors and neighborhood associations to the north of the FMC campus. Their concerns focused mostly about concerns of increased traffic in the neighborhood north of the former Walter Reed Army Medical Center.

<i>Consulting Party</i>	<i>Disposition of Comments</i>	<i>Remarks</i>
US Commission of Fine Arts	14th & Alaska intersection	Intersection supports existing street network
National Capital Planning Commission	14th & Alaska intersection	Concern about maintaining open campus while closing off streets, complete street network
DDOT	14th & Alaska intersection	Recommends proposed intersection as mitigation for other FMC access points
DC Planning Office	No comments	
WR-LRA	Position not clear	North-south access via 14 <sup>th</sup> St. However, coordinate options with CNMC and LRA
Children's National Medical Center	14 <sup>th</sup> cul-de-sac	Prefer drop-off at historic entrance to Building 54
EPA, Region III	14 <sup>th</sup> cul-de-sac	Concern about "potential negative impacts" to neighbors
Dept of Interior	No comments	
ANC4A08 Commissioner	14 <sup>th</sup> & Alaska intersection	Expressed as personal view
1400 block of Floral Street	14 <sup>th</sup> cul-de-sac	Letter signed by 13 residents strongly urging the cul-de-sac option. Concern about residential zone becoming pass-thru from commuters
Charlene Fodrepo 1319 Floral St	14 <sup>th</sup> cul-de-sac	Control traffic patterns in area
Monica Groletiani Brightwood	14 <sup>th</sup> & Alaska intersection	Concern about pushing all of traffic to 16 <sup>th</sup> and Aspen
Written comment (author unknown)	14 <sup>th</sup> cul-de-sac	Encourage use of Main Dr and Dahlia St
Edmund Atkins Shepherd Park Citizen Assoc.	14 <sup>th</sup> cul-de-sac	Limit vehicular access to our neighborhood
Angela Schmidt 1400 block of Floral St	14 <sup>th</sup> cul-de-sac	Concern about traffic patterns coming off of 16 <sup>th</sup> St to access campus
Joseph Hairston	14 <sup>th</sup> cul-de-sac	Concern about commuter traffic using 14 <sup>th</sup> as a way around congestion on 16 <sup>th</sup> St
Written comment (author unknown)	14 <sup>th</sup> cul-de-sac	Concern about traffic in neighborhood to north
Written comment (author unknown)	14 <sup>th</sup> cul-de-sac	Too much traffic on 14 <sup>th</sup> St
Written comment (author unknown)	14 <sup>th</sup> cul-de-sac	Neighborhood concerns, prefers pedestrian and bike connection only
Written comment (author unknown)	14 <sup>th</sup> cul-de-sac	Neighborhood impacts

## **TRANSPORTATION (excerpts from newest updated Master Plan Design Guidelines)**

### **Alternate Transportation**

Emissions from vehicles are a significant generator of air pollution in urban locations such as Washington, DC. In addition, vehicular traffic congestion affects the quality of living for both the occupants of the cars and the neighborhoods that they travel through. Utilizing public transportation and alternative means of transportation, such as bicycles, will reduce vehicular trips and have a positive impact on the environment.

The District has recognized these positive impacts on the city in recent changes to the DC Zoning regulations. Mitigation measures such as providing financial support for employees using public transportation, providing electric vehicle charging stations, and providing bicycle parking and washroom facilities.

Each chancery shall substantially meet the minimum DC Zoning requirements for bicycle parking and shower and changing facilities. Sustainability standards, such as LEED, mandate greater capacity for bicycle storage and support facilities than local regulations.

#### Short-term Bicycle Parking:

- Minimum 1 space per each 40,000 GSF,
- Locate on chancery lot within 120 feet of a primary entrance,
- Bicycle racks, lighting and paving shall conform to requirements in DC Zoning Regulations.

#### Long-term Bicycle Parking:

- Minimum 1 space per each 5,000 GSF,
- Locate within chancery building or structured parking,
- Bicycle room, Bicycle racks or locker, and access shall conform to requirements in DC Zoning Regulations,
- Provide changing rooms with showers and lockers to support employees who use alternative means of transportation. Refer to DC Zoning for minimum requirements.

### **Transportation Impact and Parking Strategies**

DOS is committed to providing a sustainable campus with the development of each chancery parcel within the FMC. A Transportation Demand Management (TDM) strategy and plan shall be required of each foreign mission. The implementation of TDM strategies for each parcel shall be dependent on the needs and policies of each foreign mission that develops parcels for chanceries within the FMC.

The goal of the TDM is to encourage chanceries within the FMC to reduce vehicle trips to and from the FMC. Due to the unique needs of each chancery, TDM elements shall be developed with each foreign mission as the chancery sites are designed to best meet the chancery and lot development needs. These individual TDM elements shall require all chanceries to provide a Transportation Management Plan to be reviewed by DDOT during chancery design.

- Each foreign mission shall submit a Transportation Demand Management (TDM) plan as part of the design review and approval process. The TDM plan will be reviewed and commented upon by DDOT;
- Each foreign mission shall meet 100 percent of its parking needs within its lot at time of occupancy and at 10 years after occupancy;

- All staff parking shall be in underground, structured parking (n.b. at Buildings 20 and 56, at grade parking is available if the structures are reused);
- Limited visitor parking (4 to 6 parking spaces) may be provided as surface parking on each chancery lot. Locate surface parking to side or rear of building and screen from street;
- Public and alternative transportation elements are available to each foreign mission to offset staff, visitor, and event parking needs. The public transportation elements include Metrobus and Metrorail. The alternative transportation elements pedestrian, bicycle, and carpooling. TDM planning shall strongly consider the utilization of public and alternative transportation elements for chancery staff to offset on-site parking needs. DC Zoning provides standards for minimum long term and short term bicycle parking and associated shower and locker facilities;
- TDM studies shall also include regularly scheduled deliveries (i.e. office supplies, special package deliveries, postal service, and event catering) and waste removal;
- If it is anticipated that the chancery may be used for the occasional, special event, TDM studies shall include recommendations for event parking strategies.

### **Reduction in Employee Vehicles due to Construction Cost Limitation**

To conform to the expectations of foreign missions and DOS requests, the FMC master plan and design guidelines allow for a ratio of one parking space per foreign mission employee. DDOT required the Master Plan traffic study to use this worst case scenario of the DOS required 1:1 parking for Foreign Missions. With the exception of 4 to 6 surface parking spaces for visitors, all employee parking spaces shall be in structured parking located within the footprint of the new chancery. This means that the employee parking will be under the chancery. Similar to the ICC, the structured parking will be below grade, under the chanceries. The exceptions to this requirement are at existing buildings (i.e. Building 40 and 41) where it is not possible to construct new parking under the existing building. In these instances, structured parking concealed from view will still be required. The other exception is Building 56 where existing surface parking of about 12 spaces will be allowed to remain.

The primary challenge with these requirements is that structured parking is significantly more expensive than surface parking. This expense is compounded by the fact that for these chanceries, the parking will also need to be underground. The cost for a surface parking space is in the range of \$3,000 to \$5,000 per space. Whereas, the cost for a parking space in structured parking is in the range of \$30,000 to \$60,000 per space, 10 to 20 times the cost of surface parking. The primary way for foreign missions to reduce this added construction cost is to support mass transit and alternative transit options for both their employees and visitors. During the design process, each foreign mission will be required to provide a Transportation Demand Management (TDM) plan that states how the foreign mission will account for employee access, visitor access and delivery access to their chancery. The specific Foreign Mission TDM plan will include how the Foreign Mission will account for their traffic and it will include their assumptions and allocations for mass transit and alternative transit access which will be a means and methods in order to reduce their structured parking requirements. Additionally the Master Plan Design Guidelines encourage Foreign Missions to adhere to sustainable design principles especially concerning traffic reduction.

## **MASTER PLAN**

### **Master Planning Criteria Elements - Porosity and Urban Planning – Street Connectivity**

During CFA and NCPC reviews, some commissioners expressed concerns about the planning options that terminated 14th Street within the FMC at a cul-de-sac in front of Building 54. While pedestrian and bicycle access would be able to continue to Alaska Avenue, these commissioners expressed concerns about the design move as limiting access to the campus and not in keeping with traditional urban planning for porosity and street connectivity. Also, DDOT has shared through their comments on the Comprehensive Transportation Review that the lack of an intersection at 14th Street and Alaska Avenue breaks the continuity of the street grid. While not documented, they believe that having this intersection will help mitigate overall traffic to and from the FMC and the neighboring developments. Other commissioners recognized the importance of limiting access to the campus for neighborhood traffic concerns as well as reflecting the design basis of historic round-about in front of Building 54 and the historic character of WRAMC as a fenced in campus with limited access.

DOS has weighed these concerns, and while recognizing that continuing 14th Street to Alaska Avenue would indeed reflect typical urban planning principals by creating a more porous campus with improved continuity of the District's street grid, DOS would rather have less vehicular connectivity with adjacent neighborhoods as a primary design element of the Foreign Mission Center for security concerns; therefore DOS has determined that based on suitability of development for the Foreign Missions Center, neighborhood concerns, and in keeping with the historic precedences of the site that the cul-de-sac option is the most appropriate option for the project.

### **Design Approach for Cul-de-sac Option**

14th Street is off-set from current alignment for two reasons. First reason is to create lots large enough to accommodate a chancery and maintain a 50-foot vegetative buffer along Alaska Avenue. The purpose of the vegetative buffer is to preserve some the significant trees, preserve the landscaped separation of the WRAMC from the adjacent residential neighborhood, and create privacy for the rear yards of the prospective chanceries. The second reason is to provide adequate stand-off distance from street to Chapel (Building 57) that will be a DOS facility.

There will be pedestrian and bicycle access to Alaska Avenue from the cul-de-sac. This access point will also accommodate underground utilities such as electrical, telecommunications, natural gas and water from Alaska Avenue. These utilities are to support the development of the FMC and could be available to CNMC (DOS to confirm). Because of the limited dimension, the impact to the fence, a contributing resource to the historic district, will be minimal.

The cul-de-sac's location and size are based on historic images of the original drop-off at Building 54. While location and size are designed to meet the needs of the FMC lots, the cul-de-sac is centered on the original entrance of the Building 54 and setback a similar distance from the entrance as the original drop-off was. The new owners of the Building 54, CNMC, endorse this design approach.

## SUMMARY

### **14th Street Layout Options Assessment: Cul-de-Sac Option Selected**

Upon DDOT's request, the team developed a Master Plan option for a vehicular connection at the intersection of 14th Street/Alaska Avenue intersection for further review and included it in the Supplemental Draft Environmental Impact Statement for public comment. The public overwhelmingly objected to the 14th street connection to Alaska Avenue, it was by far the largest topic of the public comments received, even a neighborhood community letter was signed by residents supporting the cul-de-sac option. Gorove Slade took a look at the potential traffic increase if 14th Street were connected to Alaska, and as expected there would be increase of traffic at that location, verifying the public's concern about increased traffic. Additionally, the cul-de-sac option provides for more leasable land to generate the income to pay for the infrastructure. The cul-de-sac design is also based on the historic turn-around originally constructed for Building 54. The new owners of Building 54, Children's National Medical Hospital supports the cul-de-sac design. The cul-de-sac design is more marketable and offers more attractive security appeal to Foreign Missions than does the street frontage connecting to Alaska. The cul-de-sac design has the least impacts on both the natural and community resources. For all of these reasons, DOS will be moving forward with the cul-de-sac design as the selected option.

## Appendix C

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# ***Responses to Substantive Comments on the FEIS***

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# ***Foreign Missions Center at the Former Walter Reed Army Medical Center***

## **Responses to Substantive Comments on the Final Environmental Impact Statement**

**U.S. Department of State  
March 2019  
Washington, D.C.**



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## **ATTACHMENT**

**Attachement: Comments on the FEIS**

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## **INTRODUCTION**

Under the CEQ's regulations implementing NEPA (40 CFR Part 1503.1), an agency that publishes an EIS is required to:

- ◇ Obtain the comments of Federal agencies with jurisdiction by law or special expertise, and
- ◇ Request comments from:
  - Agencies at all levels of government authorized to develop and enforce environmental standards;
  - Indian tribes, when the effects may be on a reservation;
  - An agency that has requested EISs on actions of the kind proposed; and
  - The public, including actively soliciting comments from those persons or organizations that may be interested or affected.

Comments received can range from statements of support for, or opposition to, an agency's proposed action to detailed critiques of the EIS's analyses and suggestions for new alternatives. Comments might identify factual errors, omissions, areas of controversy, and provide new information to be considered in the analysis of alternatives and prior to decision-making.

The comment-response process includes all steps from receipt and consideration of comments through the preparation of responses. An agency cannot complete the NEPA process until it has considered and responded to substantive comments on the FEIS in the ROD. The comment-response process is intended to help make better and more informed decisions.

On November 17th and December 1st, 2017, DOS sent emails to coordinating agencies (58 recipients) advising them of the status of the study, the circulation of the FEIS, and opportunities to provide comments. On November 20th and December 1st, 2017, DOS sent emails to the project mailing list (458 recipients), advising them of the status of the study, the circulation of the FEIS, and opportunities to provide comments. Additional reminder emails were sent to coordinating agencies and the project mailing list on December 14th and December 27th, 2017. Notices were also posted on selected Ward 4 list serves: Brightwood, Carter Barron East Neighborhood, Chevy Chase Community Listserv, Crestwood, Lamond-Riggs, Petworth, 16th Street Neighborhood Association, Southwest Petworth, and Takoma DC. The FEIS publication was announced at Advisory Neighborhood Commission (ANC) 4A and 4B meetings in November 2017.

The DOS announced the availability of the FMC at the Former WRAMC FEIS on November 30th, 2017 (Federal Register, Vol. 82, No. 229). A 30-day review period immediately followed, during which DOS invited Federal, District and local agencies, organizations, and individuals to submit comments on the FEIS. The DOS received five comment letters on the FEIS.

The public review period on the FMC at the Former WRAMC FEIS closed on December 31st, 2017.

The requirements for responding to comments received on EISs are contained in 40 CFR 1503.4. When identifying substantive comments, DOS closely examined each letter, card and email and took a conservative approach to identifying substantive comments; if a remark appeared to suggest modifying an alternative, developing and evaluating a new alternative, improving or modifying the analysis, or making factual corrections, it was identified as a substantive comment.

Individual comments are identified in Exhibit 1 and each was assigned a unique comment number. Responses to each comment are arranged numerically by comment number in Exhibit 2.

### **What is a Substantive Comment?**

A substantive comment is one which suggests the modifications of an alternative; suggests the development and evaluation of an alternative not previously considered; supplements, improves or modifies analyses; or corrects a factual error.

### **40 CFR 1503.4: Response to Comments**

- A. An agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and shall respond by one or more of the means listed below, stating its response in the final statement. Possible responses are to:
  - 1. Modify alternatives including the proposed action.
  - 2. Develop and evaluate alternatives not previously given serious consideration by the agency.
  - 3. Supplement, improve, or modify its analyses.
  - 4. Make factual corrections.
  - 5. Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.
- B. All substantive comments received on the draft statement (or summaries thereof where the response has been exceptionally voluminous), should be attached to the final statement whether or not the comment is thought to merit individual discussion by the agency in the text of the statement.
- C. If changes in response to comments are minor and are confined to the responses described in paragraphs (a)(4) and (5) of this section, agencies may write them on errata sheets and attach them to the statement instead of rewriting the draft statement. In such cases only the comments, the responses, and the changes and not the final statement need be circulated (Sec. 1502.19). The entire document with a new cover sheet shall be filed as the final statement.

## Exhibit 1 - Summary of Substantive Comments

Received From	#	Comments
<b>Federal Agencies</b>		
U.S. Environmental Protection Agency <b>Barbara Rudnick,</b> <b>NEPA Team Leader,</b> <b>Office of Environmental Programs</b>	1-1	EPA maintains the recommendation to remediate PCBs to meet unrestricted use concentrations (0-1 ppm) whenever possible. Building 40 remains a concern, due to the PCB contamination present there. If considered for adaptive reuse, remedial efforts should meet or be less than the acceptable concentration for the anticipated building use. Technologies to remove PCBs from concrete should be explored. Additionally, further groundwater testing in this area is recommended.
National Capital Planning Commission <b>Diane Sullivan, Director,</b> <b>Urban Design and Plan Review Division</b>	2-1	NCPC requests that the Department of State include traffic and level of service data related to the benefits/constraints of closing the 14th Street, NW connection to Alaska Avenue. It would also be helpful to understand how the cul-de-sac option leads to greater State Department control of the street.
	2-2	We note that since the Section 106 process is ongoing and the programmatic agreement is still in draft form, the Department of State should reflect any changes to the proposed mitigation and programmatic agreement in the FEIS.
	2-3	We support and applaud the Department of State for developing a tree inventory for the FMC and encourage you to protect existing mature heritage trees identified in the survey on individual parcels.
	2-4	While we understand that only the landscape south of Building 1 on the District of Columbia portion of the former Walter Reed Army Medical Center is contributing to the historic district, the tree canopy on the FMC is in essence an extension of the Rock Creek Park across 16th Street, NW to its west. Protecting the existing tree canopy between 16th Street, NW is a priority in order to maintain the visual connection between the FMC and Rock Creek Park.
<b>District Agencies</b>		
District of Columbia Office of Planning <b>Timothy Dennee,</b> <b>Architectural Historian</b>	3-1	The greatest adverse impact foreseen by the EIS is the demolition of numerous buildings that contribute to the character of the Walter Reed Army Medical Center Historic District. This impact should be clearly stated and characterized. The buildings proposed to be razed should be listed in the main text, on pages 122-123, and depicted on a map as being demolished.
	3-2	The preferred action should be explicitly categorized as constituting major, direct and long-term (i.e., permanent) physical impacts on the resources themselves and on the integrity of the historic district.
	3-3	Both the demolition and the new construction should be acknowledged as potential indirect impacts on the remaining resources, because of physical and visual effects upon their setting (including that of Building 57; page 123 only anticipates potential direct alterations to the chapel, for instance, from its adaption to reuse).
	3-4	... the design guidelines allow security fences up to ten feet tall, which seems excessive in itself, but may also result in the physical alteration of the historic perimeter fence. <b>See Historic</b>
	3-5	With the exception of the chapel, historic buildings disappear from the proposed plans or are depicted with dashed outlines—or either/both, depending on which map is consulted. Our concern remains that such a depiction, and the accompanying text, invite their removal. <b>See</b>
	3-6	Page 31 states that the preferred alternative was selected, in part, because it best minimizes potential impacts to cultural resources. We are not convinced, however, because the EIS does not state as required “whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and, if not, why they were not” (page 14).
	3-7	This EIS has been flawed in that it has not proposed or studied a maximal preservation alternative; the previous alternatives were roughly equivalent, an almost random reshuffling of similar ideas that did not sufficiently avoid adverse effects.

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**Exhibit 1 - Summary of Substantive Comments (Continued)**

Received From	#	Comments
District of Columbia Office of Planning  <b>Timothy Dennee,</b> Architectural Historian	3-8	On page xvi, it is stated that “the No Action Alternative would result in the continued deterioration of historic resources.” This is true in the short term, and true if no one could ever take an action, but the conclusion overlooks the near certainty that another entity would acquire the property if it did not become an FMC.
	3-9	We recommend removing from the appendices the July 2017 draft of a programmatic agreement to resolve effects pursuant to the National Historic Preservation Act. It is sufficient to state in the text that consultation continues on such an agreement. It would be misleading to imply that this version accurately represents the text upon which we may ultimately agree.
	3-10	Neither the PA draft nor the EIS sufficiently address retention of Buildings 40 and 41, and neither contains sufficient mitigation for the removal of even the residential buildings. The proposed mitigation is mostly minimization of future effects.
	3-11	On page 25, the Armed Forces Retirement Home-Washington is dismissed as an alternative location because of its relative marketability and its distance from other embassies, yet it is the same distance from the Van Ness International Center as Walter Reed, half the distance from downtown (and roughly the same distance from downtown as Van Ness). NCPC’s 2013 “Draft Foreign Missions and International Organizations Element Updated Policies” were written with the purpose of redirecting the FMC to Walter Reed after the installation closed, but the Comprehensive Plan of the National Capital encourages “priority consideration for the location of a new foreign missions center” at AFRH. This should be kept in mind with the reduction of the Walter Reed FMC parcel and the State Department’s obligation to protect historic buildings.
District of Columbia Department of Transportation  <b>Jim Sebastian,</b> Associate Director	4-1	The FEIS is expected to be updated to reflect DDOT’s prior comments.
	4-2	The FEIS is expected to be updated with a commitment to not preclude a future vehicular connection of 14th Street to Alaska Avenue by committing to a building prohibition in the area that would serve as a 14th Street connection to Alaska Avenue.
	4-3	DDOT expects responses indicated DOS’s responses to DDOT’s April 26, 2017 comments. The FEIS is expected to be updated to include the final Design Guidelines that have been updated to satisfactorily address DDOT’s comments in the April 26, 2017 letter. DDOT requests an opportunity to review the draft final Design Guidelines before they are published.
	4-4	The FEIS is expected to be updated to include a commitment to install a 100’ westbound right turn lane at the Dahlia Street & Alaska Avenue intersection.
	4-5	The FEIS is expected to be updated to reflect the following: <ul style="list-style-type: none"> <li>◇ Specify that a minimum of 19-dock Capital Bikeshare stations will be provided;</li> <li>◇ Specify that the on-site bikeshare station will be provided prior to the opening of the first chancery; and</li> <li>◇ Specify that the off-site bikeshare station will be provided by 25% build-out of the site.</li> </ul>
	4-6	The FEIS is expected to be updated to include a connections from both the east and west side of the 14th Street cul-de-sac to the 14th Street/ Alaska Avenue intersection.

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**Exhibit 1 - Summary of Substantive Comments (Continued)**

Received From	#	Comments
District of Columbia Office of Planning Eric D. Shaw, Director	5-1	DOS is encouraged to reconsider the closing of 14th Street, NW to vehicular access at Alaska Avenue, NW, where there is a cul-de-sac terminus in the selected alternative in the FEIS. The Office of Planning concurs with the NCPC's March 2, 2017 report which "recommends DOS explore connecting 14th Street, NW to Alaska Avenue, NW to complete the street network in this part of the District." ... If DOS is unable to maintain vehicular access at 14th Street, NW and Alaska Avenue, NW, please commit in the FEIS to not preclude this future connection either by DOS or another entity. This commitment would entail excluding a future chancery building from occupying the footprint of a 14th Street connection to Alaska Avenue.
	5-2	DOS is encouraged to employ a Complete Streets design for all internal roadways of the Foreign Mission Center at the Former Walter Reed Army Medical Center that provide a safe and comfortable environment for walking and biking.
	5-3	DOS is encouraged to incorporate a recommendation in the Design Guidelines for reducing curb cuts on internal roadways through the use of shared driveway access for chanceries or other means in order to provide a safe and comfortable environment for walking and biking.
	5-4	DOS is encouraged to incorporate policies contained in the Foreign Missions and International Organizations Element and the Urban Design Element of the <i>Comprehensive Plan for the National Capital</i> regarding the appropriate use of security features.
	5-5	DOS is encouraged to orient future chanceries to follow a pattern of the neighborhood while design of buildings, grounds, and security should respect the open feel and design of the campus. Chanceries and embassies should present an attractive street frontage on all sides with a park-like character facing 16th Street and Alaska Avenue. Buildings should have public entrances accessible from the streets they front.

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**Exhibit 2 - Responses to Substantive Comments**

Comment #	Response to Substantive Comment
1-1	<p>Page 3-46 of the FMC Master Plan states: "The EPA allowed the Army to remediate PCB ground contamination areas for reuse as a hospital (commercial/industrial land use). If the contaminated land is to be used for more restrictive use (i.e. residential or educational), additional site clean-up may be required. Also, deep excavation for underground parking may require additional remediation."</p> <p>Under stipulations in the Programmatic Agreement (PA), DOS will consult with EPA to determine whether the requirements of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) apply to Building 40 or 41. Through the CERCLA process, the DOS shall take or to the extent feasible ensure the lessee undertakes remediation actions necessary to assure protection of human health and the environment. DOS will request funding through their annual budget for an environmental analysis to include remediation assessment and implementation for Building 40.</p>
2-1	<p>The comprehensive transportation review (CTR) report prepared by Gorove Slade for DOS in January 2017 reflects the cul-de-sac option. As requested by DDOT, Gorove Slade also completed an additional review of the vehicular capacity analysis results of the FMC as related to the 14th Street cul-de-sac option, and prepared a revised version of the FMC CTR report in March 2017, and subsequent Comment Response Memorandums submitted to DDOT in June and August of 2017.</p> <p>Limiting through traffic at 14th street provides a number of lots that are not on a common path of travel, i.e., motorists will only be on this section of road if they were searching specifically for a particular foreign mission there. This level of privacy or seclusion is very desirable by some foreign missions that prefer to maintain a low profile. The ability to market lots with this kind of limited access is very important to the success of the FMC.</p>
2-2	<p>The PA was finalized on 4 December 2018, which concluded the Section 106 process. See ROD Appendix A for the final PA.</p>
2-3	<p>The FMC Master Plan states the intent to preserve heritage trees and large diameter trees that are in good condition, including preservation of the critical root zone on page 3-24. FMC Master Plan page 5-22 states that foreign missions are strongly encouraged to obtain a Heritage Tree Removal Permit through the DC Urban Forestry Administration. Figure 5-24 of the FMC Master Plan identifies large and heritage tree critical root zones which are in good condition to guide new missions in site development in regard to these large and special trees.</p>

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**Exhibit 2 - Responses to Substantive Comments (Continued)**

Comment #	Response to Substantive Comment
2-4	<p>The master plan describes the vegetative buffer surrounding the FMC on page 4-26:</p> <ul style="list-style-type: none"> <li>◇ “At Alaska Avenue edge, maintain existing vegetative, landscape buffer in 10-foot DC right of way between Perimeter Fence and FMC property line. Provide additional 40-foot vegetative, landscape buffer within FMC. This portion within the FMC shall be maintained by the foreign missions.</li> <li>◇ At 16th Street edge, maintain existing vegetative, landscape buffer in 40-foot DC right of way between Perimeter Fence and FMC property line. Provide additional 10-foot vegetative, landscape buffer within FMC. This portion within the FMC shall be maintained by the foreign missions.</li> <li>◇ Tree preservation within Buffer Zone shall substantially conform to DC tree preservation regulations.”</li> </ul> <p>Master plan pages 5-21 and 5-22 describe the tree preservation component of the plan. The master plan language is summarized below:</p> <p>Site plans shall take into consideration existing Heritage Trees and Special Trees in their respective layouts and provide ample root volume to adequately preserve these existing trees. These trees will be identified for the foreign missions via a certified arborist by DOS. Buildings, structures and paved areas should be placed with the existing trees in mind to not only preserve the tree, but obtain the greatest value from the existing canopy and other positive attributes.</p> <p>It is recommended that each site plan take creative measures that work towards the preservation of existing Heritage Trees where possible (e.g., cantilevered building areas). Foreign missions are strongly encouraged to obtain a Heritage Tree Removal Permit through the DC Urban Forestry Administration (UFA). Any <i>Heritage Tree</i> that will have disturbance within its CRZ should have its own tree protection program devised by a certified arborist per DDOT regulations. Heritage Trees which are not able to be preserved should require a thorough explanation as to why (i.e. detrimental to a functional layout, failing condition, etc.) and provided as part of the design review process.</p> <p>Foreign missions are strongly encouraged to obtain a Special Tree Removal Permit through the DC UFA. DCMR Chapter 24-37 for Special Trees provides direction for replacement trees when a <i>Special Tree</i> or <i>Heritage Tree</i> is removed. These regulations stipulate the replacement of a Special Tree or Heritage Tree with a number of saplings on minimal size whose aggregate circumference equal or exceeds the circumference of the tree to be removed. DOS encourages substantial compliance by the foreign missions with these local regulations.</p>
3-1	<p>The FMC site includes 16 existing buildings, all of which were evaluated for potential reuse by a foreign mission. 11 of the 16 buildings were identified as contributing to the WRAMC Historic District. 8 of those 11 buildings are residential structures that were not constructed by the Army but were absorbed as part of the campus when the site was expanded to the north. DC-HPO has signed the PA which clearly states the adverse effects; the intention for development, and the agreed mitigations which are part of that agreement (see Appendix A).</p>
3-2	<p>DC-HPO has signed the PA which clearly states the adverse effects; the intention for development, and the agreed mitigations which are part of that agreement (See Appendix A).</p>
3-3	<p>A critical aspect of the development history of the WRAMC is that buildings were added and removed on a regular basis based on the programmatic needs of a point in time. The campus as it existed in 1956, the end of the period of significance, is quite different from what exists today. Leaving the pre-1956 buildings in place and removing all other structures would not reconstitute the campus as it existed at that time. In this case "integrity" is a challenging attribute to quantify and assess.</p> <p>DC-HPO has signed the PA which clearly states the adverse effects; the intention for development, and the agreed mitigations which are part of that agreement (see Appendix A).</p>
3-4	<p>The existing perimeter fence will not be modified in the development of the FMC, with the exception of modifications to the entry gates on Alaska Avenue and Fern Street to adjust to the proposed streets and sidewalks. The fences described in the design guidelines will be new fences on the individual properties. The height is set based on what the US requires at sites in other countries.</p>

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**Exhibit 2 - Responses to Substantive Comments (Continued)**

Comment #	Response to Substantive Comment
3-5	The Selected Action Alternative is clear that the residential structures at the western edge of the site will be removed. The Chapel (Building 57) will be renovated by the DOS. The remaining two contributing buildings, 40 (WRAIR) and 41 (Red Cross) are being actively marketed by DOS to foreign missions for reuse. If a partner is identified that is interested in reusing either of these buildings, in total or in part, they will be retained.
3-6	The process for developing the options for development of the FMC is described in FEIS Chapter 2.0 Alternatives Analysis. The process included evaluating a series of parameters, including historic preservation. The Selected Action Alternative provides the best balance of the range of parameters evaluated.
3-7	The potential for maximizing preservation and reuse of all the contributing buildings was undertaken by evaluating the potential reuse of each building through design charrettes, to which the DC-HPO was an invited participant. The reuse of the residential structures as chanceries was determined to not be feasible due to the size, configuration and condition of these buildings.
3-8	There was no action alternative in which the DOS was not going to utilize the property for use as an FMC. As such, if a contributing building had to remain but could not be converted for use as a chancery it would result in the continued deterioration of the historic resource.
3-9	The PA was finalized on December 4, 2018, and has been included in this ROD as Appendix A. In addition, the ROD reflects the language included in the final PA.
3-10	Section 4.2 (page 4-17) of the FMC Master Plan addresses the potential reuse of Buildings 40 and 41 by stating that "Within this alternative, two of the historic buildings within the boundary of the proposed FMC, Buildings 40 and 41, have been identified for potential reuse. This is dependent, however, upon DOS identifying and entering into an agreement with a foreign mission to reuse these buildings." The signed PA (December 4, 2018) includes mitigation measures that have been agreed to by all of the signatories, including the DC-HPO.
3-11	<p>The decision to place the FMC on the parcel of land transferred from the Army to DOS at the former WRAMC is final and was based on input and consultation with other agencies including CFA and NCPC. The 2016 Comprehensive Plan for the National Capitol- Foreign Missions and International Organizations Element clearly outlines the decision to place the FMC at WRAMC as opposed to any other location:</p> <p><i>"After several years of considering the suitability of other locations throughout the District, the State Department concluded that the former Walter Reed Army Medical Center site presented a viable option for the development of a foreign missions center of a similar size and scale to the existing International Chancery Center. 16th Street is one of most important streets in Washington, with visual and symbolic connections to the White House and the historic embassy district centered on Meridian Hill, making it an appropriate location for the development of a new international center."</i></p>
3-12	See response to comment #3-10.

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**Exhibit 2 - Responses to Substantive Comments (Continued)**

Comment #	Response to Substantive Comment
4-1	<p>The three DDOT letters have been added to the ROD as Appendix B. DOS provided responses to the DDOT letters through a continuing coordination process during the development of the FEIS, including a technical memorandum response memo dated August 11, 2017, also found in Appendix B. The FEIS reflects changes resulting from the DDOT coordination process.</p> <p>Regarding DDOT comments remaining on the April 26, 2017 DDOT Letter, the FMC Master Plan addresses DDOT comments as follows:</p> <p><i>14th Street Design – Changes are needed for the 14th Street design to encourage low speeds. As proposed, the separated portion of 14th Street features 20 feet of pavement in each direction, which includes a 4 foot shoulder and combined 16 foot travel lane and bike lane. While DDOT understands the separated portion of the street must maintain 20 feet of clearance to qualify as a fire lane, as designed the road is excessively wide and could encourage speeding. DoS should coordinate with DDOT to explore alternate design options that satisfy fire lane requirements while encouraging low speeds. Possible solutions include varying pavements, materials, markings, and textures, and dedicated bicycle facilities.</i></p> <p>The FMC Master Plan calls for traffic calming measures to be included on 14th Street on page 4-27.</p> <p><i>Dahlia Street design – Dahlia Street west of 14th Street should include a minimum 4 foot tree box on the north side of the street.</i></p> <p>The FMC Master Plan refers to DDOT guidelines for tree box standards on page 4-23.</p> <p><i>Bicycle lanes – Bicycle lanes throughout the site should be widened from 4 feet to 5 feet to meet DDOT standards. Text on Page 4-21 calls for 5 foot bicycle lanes but street cross sections show 4 foot lanes.</i></p> <p>Bicycle Lanes have been increased to 5' per DDOT standard.</p>

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**Exhibit 2 - Responses to Substantive Comments (Continued)**

Comment #	Response to Substantive Comment
<p>4-1 (continued)</p>	<p><i>Street Width – DDOT recommends a 30 foot cartpath (two 5 foot bicycle lanes and two 10 foot travel lanes) for all private streets with two travel lanes, two bicycle lanes, and no parking. 10 foot travel lanes also match the proposed travel lane width on LRA streets.</i></p> <p>The FMC Master Plan shows 10' travel lanes that match the LRA development for safety, and 15' travel lanes where bike lanes are required for a total 30' cartpath.</p> <p><i>Pedestrian Curb Ramps – The Master Plan states that one curb ramps will be provided at each corner of an intersection (Page 4-23). DDOT standards call for two curb ramps at each corner to account each pedestrian movement.</i></p> <p>The FMC Master Plan standards for curb ramps are listed on page 4-24: "Accessible curb cuts for sidewalks shall be provided at intersections located within the crosswalks and/or pedestrian paths of travel. Curb cuts shall be constructed to be compliant with ADA and UFAS design standards. . Page 4-22 of the FMC Master Plan states: "Since the streets are extensions of the existing city grid, the streets shall be bituminous concrete (asphalt) and shall be built to DDOT standards including two curb ramps, lane and cross walk markings."</p> <p><i>Short-term bicycle parking – The Master Plan states that "no street furnishings fixed or movable" including bike racks will be permitting "on or adjacent to FMC sidewalks" (Page 4-23). Short-term bicycle parking within the streetscape will be important to accommodate bicycle demand for the site. DDOT expects that short-term bicycle parking spaces will be located in easily accessible spaces in close proximity to primary building entrances.</i></p> <p>In the FMC Master Plan (Page 5-25), the minimum requirement for short term bicycle parking is identified to be: 1) minimum one space per each 40,000 gross square foot, 2) located on chancery lots within 120 feet of a primary entrance, and 3) in conformance with DC Zoning regulations.</p> <p><i>Alaska Avenue/14th Street vehicular connection -The Master Plan states that the 14th Street &amp; Alaska Avenue intersection will be closed to vehicular traffic (Page 4-25). Per DDOT's February 14, 2017 letter, the CTR identifies several impacted intersections not proposed to be mitigated, including 16th Street &amp; Main Drive and Dahlia Street &amp; Alaska Avenue. Impacts at these intersections are caused in large part by the exclusion of a vehicular access point at the 14th Street/Alaska Avenue intersection. Vehicle access at this location is needed to distribute site traffic and reduce impacts at the other access points. The Master Plan should be updated to reflect the vehicular connection at this intersection.</i></p> <p>The connection at 14th Street will be pedestrian/bicycle only. This minimizes impacts to historic resources, as 50 to 60 linear feet of the historic fence would need to be removed for the through-street option. Mitigations as discussed with DDOT and documented in meeting notes from the August 11, 2017 meeting have been incorporated into this document and into the master plan.</p> <p><i>Site access approach - The Master Plan states that "primary access to the chancery shall be from the primary frontage" and defines Main Drive as a primary street. Per DDOT's February 14, 2017 letter, parcels with access to the Dos street network are expected to provide vehicular site access from such streets and not from Main Drive. Any proposed curb cuts from Main Drive would require DDOT approval and would need to meet DDOT standards.</i></p> <p>Curb cuts along Main Drive will be limited except where no other frontage affords access to lots.</p> <p><i>Heritage Tree preservation - The Master Plan states that "it is recommended that each site plan take creative measures that work towards the preservation of existing Heritage Trees wherever possible" (Page 5-22). Heritage Trees are defined as a tree with a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. DoS should coordinate with DDOT's Urban Forestry Administration (UFA) to identify Heritage Trees on site and evaluate their condition. Healthy Heritage Trees might be permitted to be relocated only with approval by the Mayor and the Urban Forestry Administration. Accordingly, buildings will be required to be designed such that they avoid conflicts with and preserve non-hazardous Heritage Trees.</i></p> <p>While DOS is exempt from these requirements, the FMC Master Plan states the intent to preserve heritage trees and large diameter trees that are in good condition, including preservation of the critical root zone on page 3-24. Master Plan page 5-22 states that foreign missions are strongly encouraged to obtain a Heritage Tree Removal Permit through the DC Urban Forestry Administration. Figure 5-24 of the Master Plan identifies large and heritage tree critical root zones which are in good condition to guide new missions in site development in regard to these large and special trees.</p>

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## Exhibit 2 - Responses to Substantive Comments (Continued)

Comment #	Response to Substantive Comment
<p>4-1 (continued)</p>	<p><i>Access &amp; Easements - The Master Plan should clearly describe the easement arrangements discussed by DoS, LRA, and DDOT (Figure 4.13 and Page 4-12). The Master Plan should be updated to include the following:</i></p> <ul style="list-style-type: none"> <li>◇ <i>Include a legend describing the meaning of each color on the map.</i></li> <li>◇ <i>Denote a public access easement for all streets and sidewalks within the LRA. Maintaining public access except in limited instances of security justification is needed. Per DDOT's February 14, 2017 letter, DoS should coordinate with DDOT to define a process and establish thresholds for security-related street closures. In addition, if desirable by DDOT or the Washington Metropolitan Area Transit Authority, DoS should allow bus routes and stops on the private streets.</i></li> <li>◇ <i>Denote the 15 feet public access easement north of the north curblines of Main Drive along the entirety of the DoS property.</i></li> <li>◇ <i>Maintain the interior of the oval (between the curbs) as a DoS property under DoS maintenance. DDOT will not accept ownership or maintenance responsibility of the interior of the oval.</i></li> </ul> <p>All required easements have been notated throughout the FMC Master Plan. The interior of the oval has been shown as DOS property.</p> <p><i>Transportation Management Plan - The Master Plan states that "all chanceries [shall] provide a Transportation Management Plan to be reviewed by DDOT during chancery design" (Page 5-7 &amp; Page 5-26). Clarify and define the processes through which DDOT would be engaged in the Design Review process and, in particular, the Transportation Demand Management Plan, including level of authority (advisory or approval).</i></p> <p>Page 5-27 of the FMC Master Plan identifies the process and approvals for the TMP for each new chancery development.</p> <p><i>Public Space Permits - Work in public space will require DDOT public space permits - All chanceries with frontage on a public street will be required to improve the public space adjacent to the property to current DDOT standards. Any work in public space, including driveways, paving, steps, and ramps must be designed to DDOT standards and will require public space permits from DDOT.</i></p> <p>The NCPC will act as the reviewing agency using the review criteria established in the Foreign Missions Act of 1982. The process is to include a broad spectrum of input including local ANC, CFA, and DC agencies such as DDOT and DC-HPO.</p>
<p>4-2</p>	<p>Page 3-51 of the FMC Master Plan contains a summary of the traffic analysis which states: "The traffic analysis assumed that the only entrance serving the FMC development would be the intersection of Main Drive and 14th Street. The results of this study are that the FMC development vehicular traffic could be accommodated by one access point." See pages 5-10 and 5-30 of the Master Plan which shows the allocated greenspace for the entire right of way of 14th Street up to Alaska Avenue. The master plan has been developed to show the right of way for 14th Street to remain clear of any future buildings using required setbacks.</p>
<p>4-3</p>	<p>See response to comment #4-1.</p>
<p>4-4</p>	<p>The August 2017 Comment Response Memorandum has been included in ROD Appendix B. DOS has committed to install a 100' westbound right-turn lane and to maintain the current orientation of the intersection.</p>
<p>4-5</p>	<p>The FEIS identifies this mitigation in exhibit 3.11, item 6: "To mitigate this impact, DOS would encourage a reduction in auto mode travel by funding the installation and first year's operation expenses of a new 19-dock Capital Bikeshare station on the FMC property. DOS would also fund the installation and first year's operating expenses for a second Capital Bikeshare station at the Takoma Metrorail station or in the adjacent neighborhood."</p> <p>The Master plan identifies a DOS commitment to allocate a Capital Bikeshare Station at the intersection of Dahlia Street and 14th Street and support an additional Capital Bikeshare Station at the Takoma Metro station on page 4-20.</p>
<p>4-6</p>	<p>The right of way for 14th Street is shown on the FMC Master Plan to remain clear of building construction. At the cul-de-sac, cyclists will be able to access bike lanes on either side of 14th Street without having to cross vehicle lanes. Inserting two bicycle paths 24' apart will not improve connectivity or safety from the cul-de-sac to Alaska Avenue and will unnecessarily create more impervious surface, contradicting sustainability goals.</p>

Comment #	Response to Substantive Comment
5-1	See response to comment #4-2.
5-2	The master plan incorporates strategies associated with this policy document.
5-3	<p>Page 5-26 of the Master Plan describes controls on curb cuts: "Each lot shall have at least one (1) but not more than two (2) access drives to the abutting public street on which the lot fronts. Single lane access drives shall not exceed 12 feet in width at the lot line. Two lane access drives shall not exceed 20 feet in width at the lot line. All access drives shall meet the elevations of curbs, gutters and roadways. Locate access points requiring a curb cut a sufficient distance (not less than 33 feet) from any street intersection so as not to disrupt traffic flow.</p> <ul style="list-style-type: none"> <li>◇ Each chancery shall have at least one vehicular entry per lot;</li> <li>◇ Two vehicular entries shall be allowed on larger lots;</li> <li>◇ Curb cut must have minimum 3 feet radius and maximum 6 feet radius.</li> </ul> <p>The design of access driveways shall be provided with adequate sight distances and turn-around areas for trucks within the access drive and substantially conform to DC Zoning and DDOT requirements."</p>
5-4	The master plan states on page 4-25: "While no additional structures are planned at this date, additional Guard Houses or Security Structures may be needed in the future at FMC access points or key street intersections. Design of new Guard Houses or Security Structures shall conform to the DC-HPO Guidelines for New Construction in a historic district."
5-5	The master plan has been developed with, and approved by, the Commission of Fine Arts. The master plan states that: "Private frontage elements and building entries shall be oriented to the primary street address."



# ***Foreign Missions Center at the Former Walter Reed Army Medical Center***

**Attachment: Comments on the FEIS**

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

December 18, 2017

Mr. Geoffrey Hunt  
Department of State  
A/OPR/RPM  
HST Room 1264  
Washington, DC 20520-1264

Re: Final Environmental Impact Statement for the Foreign Missions Center at the Former Walter Reed Army Medical Center, Washington, D.C. March 2017 (CEQ #20170225)

Dear Mr. Hunt:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Department of State's (DOS) Final Environmental Impact Statement (FEIS) for the Foreign Missions Center at the Former Walter Reed Army Medical Center in Washington, DC.

The purpose of the Proposed Action is to prepare a master plan for the long-term development of a Foreign Missions Center (FMC), establishing design and land-use principles for the construction of new buildings, roadways, open greenspaces, and utilities. The need for the FMC is based on increased and high demand for foreign mission facilities in the District of Columbia, in addition to the need for land to use in property exchanges with other countries. The FEIS identifies Alternative 7 as the Selected Alternative because it furthers the purpose of the project, maintains the existing site character, addresses community concerns, and minimizes potential impacts to cultural resources. The Selected Alternative would provide a maximum of 15 lots for chancery development.

EPA reviewed the May 2017 Supplemental Draft EIS (SDEIS), and submitted a letter dated May 18, 2017 in which EPA rated the SDEIS an EC-2 (Environmental Concerns/Insufficient Information). Our concern expressed in the SDEIS was regarding the implementation of contaminant remediation, transportation plans, and stormwater management plans. Including the design guidelines was informative, as it enhances understanding of the project process. We appreciate that our comments were fully considered, and that modifications were made to the FEIS based on agency and public comments. The following recommendations should continue to be considered as the project goes forward.

- EPA maintains the recommendation to remediate PCBs to meet unrestricted use concentrations (0-1 ppm) whenever possible. Building 40 remains a concern, due to the PCB contamination present there. If considered for adaptive reuse, remedial efforts should meet or be less than the acceptable concentration for the anticipated building use. Technologies to remove PCBs from

1-1



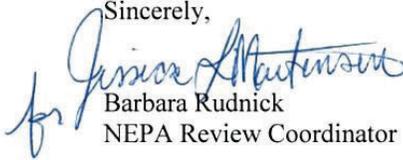
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1-1 cont.

concrete should be explored. Additionally, further groundwater testing in this area is recommended.

Thank you for the opportunity to review this project. EPA looks forward to working with DOS in the future. If you have questions regarding these comments, the staff contact for this project is Nora Theodore; she can be reached at 215-814-2728 or [theodore.nora@epa.gov](mailto:theodore.nora@epa.gov).

Sincerely,

  
Barbara Rudnick  
NEPA Review Coordinator



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**National  
Capital  
Planning  
Commission**

401 9<sup>th</sup> Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel: 202.482.7200 Fax: 202.482.7272 www.ncpc.gov

IN REPLY REFER TO  
NCPC File No. MP 305-7393

December 21, 2017

Geoffrey Hunt  
Department of State  
A/OPR/RPM  
HST Room 1264  
Washington, DC 20520-1264

RE: Comments on the Final Environmental Impact Statement for the Foreign Missions Center Master Plan at the Former Walter Reed Army Medical Center

Dear Mr. Hunt:

Thank you for the opportunity to review the Final Environmental Impact Statement (FEIS) for the Foreign Missions Center (FMC) Master Plan. The FMC is located in Northwest Washington, DC at the former Walter Reed Army Medical Center campus. Staff is supportive of the Department of State and its responsibility to site foreign missions in the nation's capital. Per the National Capital Planning Act<sup>1</sup>, NCPC will use the environmental impact statement to inform its review of the Foreign Missions Center Master Plan. As individual chanceries are proposed, NCPC will review the site and development projects in accordance with the Memorandum of Agreement (MOA) signed on February 27, 2017 between the Department of State and NCPC. NCPC will review future infrastructure projects on the campus in accordance with the National Capital Planning Act<sup>2</sup>.

We are generally supportive of the FEIS as an appropriate analysis of the FMC Master Plan. The FEIS identifies a preferred alternative and a no action alternative for the FMC Master Plan. The preferred alternative includes the following elements: a maximum of 15 buildable lots in three development zones; a cul-de-sac at 14<sup>th</sup> Street, NW; reuse of Buildings 41, 56 and 57 and potential reuse of Buildings 40, 32 and 20; and the development of Dahlia and 14<sup>th</sup> Streets as boulevards supporting pedestrian, bicycle and vehicular traffic. Ours comments focus on transportation, historic preservation and natural resource impacts.

#### Transportation

There are a several transportation related mitigation elements included in the FEIS that NCPC supports including: the addition of a bicycle and pedestrian network throughout the campus, and the replacement of the existing parking along 14<sup>th</sup> Street between Dahlia Street and Main Drive with a low-impact development parkway to reduce stormwater runoff.

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<sup>1</sup> 40 USC§ 8722 (b)(1)

<sup>2</sup> 40 USC§ 8722 (b)(1) and (d)

Mr. Geoffrey Hunt  
Page 2

NCPC is also supportive of ongoing discussions and coordination with the District Department of Transportation (DDOT) and the Washington Metropolitan Area Transit Authority, as cited in the EIS, to improve transit access to this site.

The Department of State proposes to permanently close 14<sup>th</sup> Street, NW north of Dahlia Street, NW and creating a cul-de-sac in the preferred alternative (currently it is gated) and states the following rationale:

- Local residents raised concerns regarding increased traffic from a re-opened 14<sup>th</sup> Street;
- Impacts to the historic fence along Alaska Avenue if 14<sup>th</sup> Street is re-opened.
- Greater Department of State control over funding and construction of the roadway if it is not a through street.
- Greater flexibility regarding lot size.
- The cul-de-sac design, similar to the International Chancery Center, is more attractive to prospective countries from a security perspective.

2-1

To support the rationale above, NCPC requests that the Department of State include traffic and level of service data related to the benefits/constraints of closing the 14<sup>th</sup> Street, NW connection to Alaska Avenue. It would also be helpful to understand how the cul-de-sac option leads to greater State Department control of the street.

Historic Preservation

2-2

The FEIS identifies how historic resources will be impacted by the proposed master plan and chancery development. We note that since the Section 106 process is ongoing and the programmatic agreement is still in draft form, the Department of State should reflect any changes to the proposed mitigation and programmatic agreement in the FEIS.

Natural Resources

2-3

The FEIS accurately describes existing conditions and proposed impacts regarding natural resources. We support and applaud the Department of State for developing a tree inventory for the FMC and encourage you to protect existing mature heritage trees identified in the survey on individual parcels. While we understand that only the landscape south of Building 1 on the District of Columbia portion of the former Walter Reed Army Medical Center is contributing to the historic district, the tree canopy on the FMC is in essence an extension of the Rock Creek Park across 16<sup>th</sup> Street, NW to its west. Protecting the existing tree canopy between 16<sup>th</sup> Street, NW is a priority in order to maintain the visual connection between the FMC and Rock Creek Park.

2-4

Mr. Geoffrey Hunt

Page 3

These comments have been prepared in accordance with NCPC's Environmental and Historic Preservation Policies and Procedures. If you have any questions, please contact Carlton Hart at [carlton.hart@ncpc.gov](mailto:carlton.hart@ncpc.gov) / (202)482-7252.

Sincerely,

A handwritten signature in cursive script, appearing to read "Diane Sullivan".

Diane Sullivan  
Director, Urban Design and Plan Review Division

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District of Columbia Office of Planning



December 26, 2017

Geoffrey Hunt, Department of State  
A/OPR/RPM, HST Room 1264  
Washington, D.C. 20520-1264

Dear Mr. Hunt:

Thank you for the opportunity to comment upon the final Environmental Impact Statement for the proposed Foreign Missions Center (FMC) at Walter Reed Army Medical Center (WRAMC). Some of our comments are similar to those expressed in a March 31, 2014 letter regarding the initial draft.

The greatest adverse impact foreseen by the EIS is the demolition of numerous buildings that contribute to the character of the Walter Reed Army Medical Center Historic District. This impact should be clearly stated and characterized. The buildings proposed to be razed should be listed in the main text, on pages 122-123, and depicted on a map as being demolished. Someone unfamiliar with the campus can grasp the demolition proposed only from comparing the map of contributing structures to those of the proposed conditions.

3-1

The preferred action should be explicitly categorized as constituting major, direct and long-term (i.e., permanent) physical impacts on the resources themselves and on the integrity of the historic district. Both the demolition *and the new construction* should be acknowledged as potential indirect impacts on the remaining resources, because of physical and visual effects upon their setting (including that of Building 57; page 123 only anticipates potential direct alterations to the chapel, for instance, from its adaption to reuse). Aside from the new buildings, the clearance of landscape, and the laying of additional pavement anticipated by the master plan, the design guidelines allow security fences up to ten feet tall, which seems excessive in itself, but may also result in the physical alteration of the historic perimeter fence.

3-2

3-3

3-4

With the exception of the chapel, historic buildings disappear from the proposed plans or are depicted with dashed outlines—or either/both, depending on which map is consulted. Our concern remains that such a depiction, and the accompanying text, invite their removal. The EIS has always been ambivalent and ambiguous about the raze of Buildings 40 (Army Medical School) and 41 (Red Cross Building) which, according to page 27, “could remain for potential adaptive reuse, depending on marketability.” The statement is a bit stronger in the historic preservation section (page 121): they “will be offered to potential lessees *with the objective that they will be renovated*,” and that should be reflected in the graphics. Building 40 is especially related to the primary significance of WRAMC.

3-5

Page 31 states that the preferred alternative was selected, in part, because it best minimizes

3-6

- 3-6 cont. | potential impacts to cultural resources. We are not convinced, however, because the EIS does not state as required “whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and, if not, why they were not” (page 14). This
- 3-7 | EIS has been flawed in that it has not proposed or studied a maximal preservation alternative; the previous alternatives were roughly equivalent, an almost random reshuffling of similar ideas that did not sufficiently avoid adverse effects. Contrasting genuine alternatives is the heart of the NEPA process—just as federal agency stewardship in avoiding adverse effects is the heart of the NHPA process. Further, the District of Columbia’s comprehensive plan directs that chanceries located in historic districts be respectful of the district’s architectural character.
- 3-8 | On page xvi, it is stated that “the No Action Alternative would result in the continued deterioration of historic resources.” This is true in the short term, and true if no one could ever take an action, but the conclusion overlooks the near certainty that another entity would acquire the property if it did not become an FMC.
- 3-9 | We recommend removing from the appendices the July 2017 draft of a programmatic agreement to resolve effects pursuant to the National Historic Preservation Act. It is sufficient to state in the text that consultation continues on such an agreement. It would be misleading to imply that this version accurately represents the text upon which we may ultimately agree.
- 3-10 | Neither the PA draft nor the EIS sufficiently address retention of Buildings 40 and 41, and neither contains sufficient mitigation for the removal of even the residential buildings. The proposed mitigation is mostly *minimization of future effects*. This is certainly true of the design guidelines. And the National Capital Planning Commission’s (NCPC) review of development cannot be considered mitigation or minimization, as the Commission lacks approval authority, and historic preservation is not necessarily its priority but, at best, one of many considerations.
- 3-11 | On page 25, the Armed Forces Retirement Home-Washington is dismissed as an alternative location because of its relative marketability and its distance from other embassies, yet it is the same distance from the Van Ness International Center as Walter Reed, half the distance from downtown (and roughly the same distance from downtown as Van Ness). NCPC’s 2013 “Draft Foreign Missions and International Organizations Element Updated Policies” were written with the purpose of redirecting the FMC to Walter Reed after the installation closed, but the Comprehensive Plan of the National Capital encourages “priority consideration for the location of a new foreign missions center” at AFRH. This should be kept in mind with the reduction of the Walter Reed FMC parcel and the State Department’s obligation to protect historic buildings.
- 3-12 | We recommend an express commitment to the retention of historic buildings and a more robust mitigation effort.

Sincerely,



Timothy Dennee  
State Historic Preservation Office

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**DEPARTMENT OF TRANSPORTATION**



**d. Planning and Sustainability Division**

December 28, 2017

Geoffrey Hunt  
Department of State  
A/OPR/RPM  
HST Room 1264  
Washington, DC 20520-1264

RE: Final Environmental Impact Statement (FEIS) for the Master Plan for the proposed Foreign Mission Center (FMC) at the former Walter Reed Army Medical Center (WRAMC)

Dear Mr. Hunt:

The District Department of Transportation (DDOT) appreciates the opportunity to submit a letter detailing DDOT's review of the FEIS for the Master Plan for the proposed FMC at the former WRAMC campus. DDOT is committed to achieving an exceptional quality of life in the nation's capital by encouraging sustainable travel practices, constructing safer streets, and providing outstanding access to goods and services. As one means to achieve this vision, DDOT works with federal projects to ensure that impacts from new developments take advantage of the District's multimodal transportation network and minimize impacts on neighborhood streets and the broader transportation network. To accomplish this, all federal projects are expected to develop a Comprehensive Transportation Review (CTR) to appropriately document and mitigate their impacts on the District's transportation network and to serve as the basis for the transportation analysis in an EIS.

DDOT and the Department of State (DoS) have coordinated over multiple years on the FMC's site design and transportation impacts, and DDOT previously submitted three letters to DoS (August 11, 2016, February, 14, 2017, and April 26, 2017) formally providing DDOT's review of the FMC project at various phases of development (see attached). These formal DDOT comments are not noted in the FEIS. While DDOT appreciates the close coordination to resolve many issues of importance to DDOT, several key concerns identified by DDOT have not been satisfactorily addressed in the FEIS that DDOT expects to be remedied.

A summary of the outstanding issues is included below:

Comment/Issue	Description of Comment/Issue	DDOT Comment/Expectation
4-1 Prior DDOT comments not acknowledged	DDOT provided three prior letters with formal comments on the FMC process (August 11, 2016, February 14, 2017, and April 26, 2017) which are not noted and addressed in the FEIS.	The FEIS is expected to be updated to reflect DDOT's prior comments.
4-2 14 <sup>th</sup> Street connection to Alaska Avenue to resolved satisfactorily	<p>The CTR identifies several impacted intersections not proposed to be mitigated, including 16<sup>th</sup> Street &amp; Main Drive and Dahlia Street &amp; Alaska Avenue. Impacts at these intersections are caused in large part by the exclusion of a vehicular access point at the 14<sup>th</sup> Street/Alaska Avenue intersection. Vehicle access at this location would distribute site traffic and reduce impacts at the other access points.</p> <p>At a DDOT/DoS meeting on July 12, 2017, DDOT agreed that while a connection to Alaska Avenue was still desired as a way to mitigate the action's impacts, DoS would not provide a connection of 14<sup>th</sup> Street to Alaska Avenue on the condition that DoS commit to not preclude a future connection either by DoS or another entity. This commitment would entail excluding a future chancery building from occupying the footprint of a 14<sup>th</sup> Street connection to Alaska Avenue. However, such a commitment is not included in the FEIS.</p>	The FEIS is expected to be updated with a commitment to not preclude a future vehicular connection of 14 <sup>th</sup> Street to Alaska Avenue by committing to a building prohibition in the area that would serve as a 14 <sup>th</sup> Street connection to Alaska Avenue.
4-3 Design Guidelines comment are unresolved	<p>DDOT's letter dated April 26, 2017 identifies needed changes to the 65% Design Guidelines (primarily Chapters 4 and 5) to ensure a safe and efficient transportation network internal to the FMC site that is consistent with the existing surrounding public streets and streets planned as part of the LRA street network.</p> <p>DoS did not provide formal responses to DDOT's comment letter. Furthermore, the FEIS does not include the entirety of the final Design Guidelines, including street design guidelines,</p>	DDOT expects responses indicated DOS's responses to DDOT's April 26, 2017 comments. The FEIS is expected to be updated to include the final Design Guidelines that have been updated to satisfactorily address DDOT's comments in the April 26, 2017 letter. DDOT requests an opportunity to review the draft final Design

Comment/Issue	Description of Comment/Issue	DDOT Comment/Expectation	
	as an attachment therefore it is unclear if DDOT's comments have been satisfactorily addressed.	Guidelines before they are published.	4-3 cont.
Dahlia Street & Alaska Avenue intersection turn lane	The CTR identified impacts at this intersection necessitating a 100' westbound right turn lane, which DoS committed to in an August 11, 2017 letter to DDOT. This letter is not included as an attachment to the FEIS nor is the commitment by DoS to install this turn lane explicitly included in the FEIS.	The FEIS is expected to be updated to include a commitment to install a 100' westbound right turn lane at the Dahlia Street & Alaska Avenue intersection.	4-4
Two Capital Bikeshare Stations	DDOT acknowledges the inclusion of funding and first year's operating expenses for two Capital Bikeshare stations as mitigations, as requested by DDOT. One of the stations will serve as a mitigation in lieu of the 16 <sup>th</sup> Street/Sherrill Drive/Aspen Street southbound right turn lane. As indicated in the FEIS, one of the stations would be located on-site and another in close proximity to the Takoma Metro station. Additional details regarding the commitment and an implementation timeline are needed.	The FEIS is expected to be updated to reflect the following: <ul style="list-style-type: none"> <li>• Specify that a minimum of 19-dock Capital Bikeshare stations will be provided;</li> <li>• Specify that the on-site bikeshare station will be provided prior to the opening of the first chancery; and</li> <li>• Specify that the off-site bikeshare station will be provided by 25% build-out of the site.</li> </ul>	4-5
Pedestrian/Bicycle Connections at the 14 <sup>th</sup> Street/ Alaska Avenue	Exhibit 1.2 in the FEIS shows a pedestrian/bicycle connection from the west side of the 14 <sup>th</sup> Street cul-de-sac to the 14 <sup>th</sup> Street/ Alaska Avenue intersection. A connection on the east side of the cul-de-sac is not shown.	The FEIS is expected to be updated to include a connections from both the east and west side of the 14 <sup>th</sup> Street cul-de-sac to the 14 <sup>th</sup> Street/ Alaska Avenue intersection.	4-6

**Continued Coordination**

In addition to the issues identified above, DoS will be expected to obtain public space permits for access points and any fixtures or improvements to the District's public space. DDOT's review of the FEIS should not be viewed as an approval of public space elements. If any portion of the project has elements in the public space requiring approval, DoS is required to pursue a public space permit through DDOT's permitting process. DoS may refer to the District of Columbia Municipal Regulations and DDOT's Design and Engineering Manual for specific controls of public space. A summary can be found in DDOT's Public Realm Design Manual.

Given the complexity and size of the project, DDOT expects to continue to work on the final design of the following matters:

- Transit accommodation;
- Public space design, including curb & gutter, street trees and landscaping, street lights, sidewalks, and other appropriate features within the public rights of way bordering the site. Careful attention should be paid to pedestrian and bicycle connections along the site's perimeter and the adjacent infrastructure;
- Curb cut design and approvals for the proposed access points;
- Quantity and location of short- and long-term bicycle parking;
- Design of the multi-use trail connecting the site with the 14<sup>th</sup> Street and Alaska Avenue intersection;
- Phasing of needed mitigation and improvements measures; and
- Access easements for the northern portion of the Main Drive ellipse.

#### Conclusion

While DDOT appreciates the coordination with DoS on this project, significant DDOT comments remain unaddressed or unresolved in the FEIS that DDOT expects to be remedied. Please revise the FEIS to address the outstanding site design and project impacts noted above. Should you have any questions, please contact Jonathan Rogers, the Case Manager for the project at [jonathan.rogers2@dc.gov](mailto:jonathan.rogers2@dc.gov) or 202-671-3022.

Sincerely,



Jim Sebastian  
Associate Director

cc: Jonathan Rogers, DDOT  
Anna Chamberlin, DDOT

District of Columbia Office of Planning



Office of the Director

December 29, 2017

Geoffrey Hunt, Department of State  
A/OPR/RPM, Room 1264  
2201 C St. NW  
Washington, D.C. 20520-1264

Re: Foreign Mission Center at the Former Walter Reed Army Medical Center Final Environmental Impact Statement

Dear Mr. Hunt,

Thank you for the opportunity to comment on the Foreign Mission Center at the Former Walter Reed Army Medical Center Final Environmental Impact Statement (FEIS). The District of Columbia Office of Planning (OP) appreciates the Department of State (DOS)'s efforts to engage the community and District government agencies in the development of the FEIS.

Following the site's identification for closure through the Base Realignment and Closure law in 2005, planning began for the Walter Reed site by the District of Columbia and federal governments. After several years of collaborative work, the Former Walter Reed Army Medical Center Small Area Plan was approved by the Council of the District of Columbia in 2013. The plan set forth a redevelopment framework structured around urban design principles that maintained the site's existing character, preserved its historic elements, enhanced open spaces, and created multi-modal circulation corridors on an extended street network in order to harmoniously integrate the campus into the surrounding neighborhoods. In accordance with this vision, new zoning was developed by OP to implement the plan, with rehabilitation of existing buildings already underway and new construction of the Parks at Walter Reed is expected to begin later this year.

The United States and District of Columbia governments share a vision to further Washington, D.C., as outlined in the Federal and District Elements of the *Comprehensive Plan for the National Capital*. In the spirit of shared stewardship, OP is hopeful that the Department of State's future Foreign Mission Center will be developed in accordance with the strong urban design principles in the Walter Reed Army Medical Center Small Area Plan to ensure consistency in intention and character on the overall site.

In April 2017, the District of Columbia and its redevelopment partner broke ground on The Parks at Walter Reed, a 3.1 million square-foot mixed-use redevelopment project that will create 6,000 jobs and 2,100 units of housing. In September 2017, the District of Columbia International School welcomed incoming students to its location at 16<sup>th</sup> and Aspen streets, NW, and continues construction to

1100 4th Street SW, Suite E650, Washington, DC 20024 voice 202.442.7600 fax 202.442.7638



accommodate 1,500 students in the 2019-2020 school year. In 2018, work will continue on the new research facility of Children’s National Health System on Fern Street, while construction is to begin on new residential projects with retail at Georgia Avenue. OP acknowledges the Foreign Mission Center’s unique security requirements can be compatible with these growing and diverse activities. OP has the following comments for the FEIS:

- |           |   |
|-----------|---|
| 5-1       | 1. Please include the DC Office of Planning in the ongoing development of the Foreign Missions Center Master Plan at the Former Walter Reed Medical Army Center (of which Section 5 - Design Guidelines were included as an appendix to the FEIS) so that they coordinate with urban design guidance for the Walter Reed site as outlined in the Former Walter Reed Army Medical Center Small Area Plan as well as with the surrounding community. The Master Plan was last reviewed by the National Capital Planning Commission (NCPC) on March 2, 2017.   |
| 5-1 cont. | 2. DOS is encouraged to reconsider the closing of 14 <sup>th</sup> Street, NW to vehicular access at Alaska Avenue, NW, where there is a cul-de-sac terminus in the selected alternative in the FEIS. The Office of Planning concurs with the NCPC’s March 2, 2017 report which “recommends DOS explore connecting 14th Street, NW to Alaska Avenue, NW to complete the street network in this part of the District.” Maintaining vehicular access, in addition to pedestrian and bicycle access, between 14th Street, NW and Alaska Avenue, NW is consistent with the vision and successful implementation of the Walter Reed Army Medical Center Small Area Plan while distributing site traffic and reducing Foreign Mission Center traffic impacts at other access points to the former Walter Reed Army Medical Center. If DOS is unable to maintain vehicular access at 14th Street, NW and Alaska Avenue, NW, please commit in the FEIS to not preclude this future connection either by DOS or another entity. This commitment would entail excluding a future chancery building from occupying the footprint of a 14 <sup>th</sup> Street connection to Alaska Avenue. |
| 5-2       | 3. DOS is encouraged to employ a Complete Streets design for all internal roadways of the Foreign Mission Center at the Former Walter Reed Army Medical Center that provide a safe and comfortable environment for walking and biking.  |
| 5-3       | 4. DOS is encouraged to incorporate a recommendation in the Design Guidelines for reducing curb cuts on internal roadways through the use of shared driveway access for chanceries or other means in order to provide a safe and comfortable environment for walking and biking.  |
| 5-4       | 5. DOS is encouraged to incorporate policies contained in the Foreign Missions and International Organizations Element and the Urban Design Element of the <i>Comprehensive Plan for the National Capital</i> regarding the appropriate use of security features.   |
| 5-5       | 6. DOS is encouraged to orient future chanceries to follow a pattern of the neighborhood while design of buildings, grounds, and security should respect the open feel and design of the campus. Chanceries and embassies should present an attractive street frontage on all sides with a park-like character facing 16 <sup>th</sup> Street and Alaska Avenue. Buildings should have public entrances accessible from the streets they front.   |

We look forward to continued engagement on the finalized Master Plan and ongoing historic review through the Section 106 process. Should you have any questions, please contact Erkin Ozberk, Senior Neighborhood Planner, at [erkin.ozberk@dc.gov](mailto:erkin.ozberk@dc.gov) or 202-420-7707.

Yours truly,

Eric D. Shaw

Cc: Brian Kenner, Deputy Mayor for Planning and Economic Development  
Jim Sebastian, Associate Director for Planning and Sustainability, District Department of Transportation  
Eugene Kinlow, Director, Office of Federal and Regional Affairs, Executive Office of the Mayor  
Marcel Acosta, Executive Director, National Capital Planning Commission