April 27, 2022

Mr. Marcel Acosta
Executive Director
National Capital Planning Commission
401 Ninth Street NW
North Lobby Suite 500
Washington, DC 20004

Re: Armed Forces Retirement Home – Washington, Master Plan Amendment #2

Dear Mr. Acosta:

The Armed Forces Retirement Home (AFRH) is pleased to submit the enclosed materials for final review of AFRH-W Master Plan Amendment #2 by the National Capital Planning Commission (NCPC) at its monthly meeting on June 2, 2022. The purposes of the proposed amendment are a general update to the plan based on a proposal from AFRH’s selected development partner and to incorporate the changes that were added as an Addendum under Master Plan Amendment #1 in 2018 back into the body of the document. The final submission for AFRH-W Master Plan Amendment #2 incorporates feedback received during early consultation with Section 106 Consulting Parties in August and September of 2021 and comments received from the AFRH-W Programmatic Agreement (PA) Signatories in March 2022.

Since the plan was originally approved in 2008, the surrounding city and neighborhoods have changed, and planning philosophies related to transportation, sustainability, urban design, and historic preservation have evolved. AFRH selected a new development partner for Zone A in 2019, which triggered a comprehensive review of the Master Plan to ensure that the document is up-to-date. This second amendment responds to changes in conditions both on campus and in the surrounding area that have occurred in the decade since the original Master Plan was approved. Most of these revisions are editorial and do not result in a change to the overall vision for or treatment of the campus and historic district. The amendment does not include changes to the development plan or design guidelines for the AFRH Zone, and all substantive changes are limited to Zone A. The amendment accommodates one minor change to the parcel plan in Zone A, responds to changes in local planning strategies and priorities since 2008, and reflects a more objective-based and context-specific approach to design guidelines for new development in Zone A. The amendment also accommodates a small increase in density in Zone A, as well as more flexibility in use and product type while maintaining all previously approved guidelines related to height and view shed protection. Finally, the amendment reflects changes in AFRH-W’s assessment data related to archaeological potential on the campus, as well as the agency’s compliance with Federal laws related to the protection of archaeological resources.
AFRH followed the specific procedures stipulated in its PA for National Historic Preservation Act Section 106 compliance for amendments to the AFRH-W Master Plan. This included early consultation with all Consulting Parties, a meeting of the PA Signatories, and review of the draft amendment by the PA Signatories. The final Master Plan Amendment #2 reflects comments received during consultation, and documentation of the consultation process is included in the enclosed submission.

AFRH is in the process of finalizing the Record of Decision (ROD) for its Final Supplemental Environmental Impact Statement (Final SEIS) under its National Environmental Policy Act (NEPA) regulations (38 CFR 200). The draft ROD is enclosed in this submission. We are in the process of finalizing the transportation mitigations with the DC Department of Transportation (DDOT) and NCPC staff and will submit the final signed ROD upon final agreement the parties. We anticipate completion of this effort with 7-10 days.

Upon approval of Master Plan Amendment #2, The DC Office of Planning (DCOP) will file proposed zoning regulations with the Zoning Commission in accordance with the Memorandum of Understanding between AFRH, DCOP, and NCPC which will allow matter of right zoning in conformance with the approved AFRH Master Plan.

AFRH appreciates the strong collaboration with NCPC staff over the long history of this project, and we look forward to working with the Commission and its staff as the redevelopment efforts move forward.

Sincerely,

[Signature]

Justin Seffens
Corporate Facilities Manager

Enclosures
I. Project Application
SUBMISSION APPLICATION

Please fill out the below information. If information has not changed since a previous submission phase (e.g. from Preliminary to Final Review), please insert previously submitted information.

Please visit our “How to Submit” webpage for instructions on what materials to send and where to send them: https://www.ncpc.gov/review/submit/

As a reminder, all digital materials must be Section 508 compliant.

Section A: Applicant Information

<table>
<thead>
<tr>
<th>1. Point of Contact Name</th>
<th>2. Agency or Organization</th>
<th>3. Mailing Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Justin Seffens</td>
<td>Armed Forces Retirement Home (AFRH)</td>
<td>3700 N. Capitol St</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Washington, DC 20317</td>
</tr>
<tr>
<td>4. Phone Number</td>
<td>5. Email Address</td>
<td>8. Mailing Address</td>
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<tr>
<td>202-541-7549</td>
<td><a href="mailto:justin.seffens@afrh.gov">justin.seffens@afrh.gov</a></td>
<td>3700 N. Capitol St</td>
</tr>
<tr>
<td></td>
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<td>Washington, DC 20317</td>
</tr>
<tr>
<td>6. Authorization Officer's Name</td>
<td>7. Authorization Officer's Organization</td>
<td></td>
</tr>
<tr>
<td>Justin Seffens</td>
<td>AFRH</td>
<td></td>
</tr>
<tr>
<td>9. Phone Number</td>
<td>10. Email Address</td>
<td>11. Signature</td>
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<tr>
<td>202-541-7549</td>
<td><a href="mailto:justin.seffens@afrh.gov">justin.seffens@afrh.gov</a></td>
<td></td>
</tr>
</tbody>
</table>

I authorize and approve the submission of this project to the National Capital Planning Commission for review.

Section B: General Project Information

12. Does this submission contain any confidential or For Official Use Only (FOUO) information?

☐ YES ☐ NO

13. Project Name

AFRH Master Plan Amendment #2

14. Project Address or Location

3700 N. Capitol St, Washington, DC 20317

15. Is the Project on federal land?

☐ YES ☐ NO

16. Type of Project

Master Plan

17a. Is this project part of an approved Master Plan?

☐ YES ☐ NO

17b. Master Plan Name: AFRH Master Plan Amend #1

18. Scheduling Issues (explain):

Final Transportation mitigations being finalized with DDOT. Draft ROD submitted will be supplemented by final ROD n/w 12 May 2022

19. Project Description (3 or 4 sentences)

This project is update #2 of the approved AFRH Master Plan. It is an incremental update to the plan incorporating elements from AFRH's selected developer's proposal, and updated design guidelines for historic preservation.

20. NCPC Review Phase

Final Review

Section C: Environmental Review

As the applicant, are you required to comply with NEPA and Section 106 of the NHPA for this project?

☐ YES – Please complete Section C

☐ NO – Please skip to Section D

21. Was the NEPA Review Initiated?

☐ YES – Please Explain: ☐ NO – Expected Schedule: ☐ N/A – Please Explain:

Final EIS Published on 25 March 2022. Draft ROD is attached to the submission package. Final ROD to be issued within 10 days of submission.

22. What is the level of NEPA Analysis?

☐ Categorical Exclusion (CATEX) ☐ Environmental Assessment (EA) ☐ Environmental Impact Statement (EIS)

23. Is the Appropriate NEPA Documentation Attached?

☐ YES ☐ NO

24. Who is the Lead Agency?

AFRH

25. Is Consultation with SHPO Under Section 106 of the NHPA Required?

☐ YES ☐ NO ☐ Other – Please Explain:

26. Was Consultation Initiated?

YES ☐ NO – Expected Schedule:

Consultation was conducted in accordance with the AFRH PA.
<table>
<thead>
<tr>
<th>Agency</th>
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<td>Tom Luebke</td>
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<td>27b. Other Federal Agency</td>
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<td>27c. State Government</td>
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<td>5/12/2022</td>
<td>Erkin Ozberk</td>
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<td>Aaron Zimmerman</td>
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<td>27e. Other</td>
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Submissions to NCPC also require a Project Report. The details of the Project Report requirements are available in the Submission Guidelines. In general, the Project Report includes a more detailed project description and an explanation of how the project complies with NCPC’s plans and policies that guide the development of the National Capital Region.

28. Is the Project Report included?  [ ] YES  [ ] NO – Please Explain:
The project summary is included in the Executive Summary of the Master Plan Amendment.
II. NHPA Section 106 Documentation
Armed Forces Retirement Home

AFRH-W Master Plan Amendment #2
National Historic Preservation Act (NHPA)
Section 106 Consultation Summary

Consultation Period: August 2021 - April 2022

The following table summarizes all formal materials related to NHPA Section 106 Consultation for AFRH-W Master Plan Amendment #2. AFRH followed the Section 106 Consultation procedures for Master Plan Amendments stipulated in the AFRH-W Programmatic Agreement.

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<td>Exhibit B</td>
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<td>Exhibit E</td>
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<td>IV.D.1</td>
<td>4/11/22</td>
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Dear AFRH-W PA Signatories,

As you know, the Armed Forces Retirement Home (AFRH) intends to ground lease an 80-acre tract of the AFRH-W campus referred to in the Master Plan as “Zone A.” After completion of a Master Plan Amendment (MPA) with you in 2018, AFRH selected a partner development team in 2019 and has been working toward execution of a ground lease since that time. An important step in this process will be to adopt a second amendment to the AFRH-W Master Plan. Because it has been three years since our last amendment, AFRH is providing this courtesy notification to the PA Signatories of its intention to initiate consultation to refresh everyone on the process and timelines.

The developer’s proposal is largely consistent with the existing Master Plan, and this amendment will be relatively straightforward from a plan and program standpoint. A primary objective of the amendment is to update this 13-year-old document and to revise the design guidelines to be less specific to the previous developer’s vision and more focused on objectives and considerations, especially from a historic preservation standpoint. All substantive changes are limited to Zone A, and only administrative and editorial revisions are proposed for sections of the Master Plan focused on the AFRH Zone, which will continue to be used by AFRH.

Prior to submitting an MPA to NCPC for review and approval, AFRH will follow the predetermined Section 106 process that is stipulated in Section IV of the AFRH-W Programmatic Agreement. For your reference, I have attached an excerpt from the PA that outlines the MPA process and have highlighted the steps that we plan to move forward with immediately (see p.8 of 117). Based on this process, our timeline for MPA #2 is as follows:

1. Early Consultation Memorandum: initiated by a memorandum that states the intention for the proposed MPA, to be emailed to all Section 106 Consulting Parties. Consulting Parties have 15 days to comment on the memorandum. AFRH intends to distribute the memorandum to Consulting Parties by August 20, 2021.

2. Signatory Meeting: Signatories will meet to discuss the proposed amendment and any comments received from Consulting Parties. The PA allows for this meeting to take place remotely. AFRH would like to schedule a teleconference for the week of September 6, 2021. AFRH will send a subsequent email to schedule that meeting once the Early Consultation Memorandum is distributed.

3. Draft Amendment: After the Signatory meeting, AFRH will incorporate comments and distribute a draft amendment to the Signatories for review. Signatories will have 30 days to review the draft amendment and provide comment. AFRH intends to distribute the draft amendment to Signatories in October 2021.

4. Final Amendment: After receiving Signatory comments on the draft amendment, AFRH will submit the final amendment to NCPC for formal review by the Commission. AFRH intends to submit the final amendment document to NCPC for review by January 2022.

Once the Early Consultation Memorandum is distributed, we will touch base with you again to schedule the Signatory consultation meeting.

Please let me know if you have any questions regarding the intentions for the MPA or AFRH’s plan for moving forward.
with consultation. We look forward to working with you through this process.

Sincerely,
Justin Seffens
Corporate Facility Manager and Federal Preservation Officer
Armed Forces Retirement Home

Visit the AFRH website: www.afrh.gov
Like us on Facebook: www.facebook.com/AFRH.gov

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Dear AFRH-W Consulting Parties,

The Armed Forces Retirement Home (AFRH) is contacting you because you are a Consulting Party in AFRH’s compliance with Section 106 of the National Historic Preservation Act (NHPA) for its Washington, DC campus (AFRH-W).

Per the 2008 AFRH-W Programmatic Agreement (PA), AFRH includes its Section 106 Consulting Parties in early consultation for proposed amendments to the AFRH-W Master Plan, which was approved by the National Capital Planning Commission (NCPC) in 2008. The process for early consultation, as outlined in Section IV.C of the PA, requires the distribution of a memorandum for review and comment by the Consulting Parties. The 2008 PA (as amended in 2015) is attached for reference, with the early consultation process highlighted for your convenience (see page 8 of 117). A copy of the NCPC-approved AFRH-W Master Plan (as amended in 2018) is available for download at: https://www.afrh.gov/aboutus/propertydevelopment

AFRH is initiating its second Master Plan Amendment (MPA #2). In accordance with the PA, the attached memorandum is distributed to the Consulting Parties to initiate early consultation for Section 106 review and includes a written description of the proposed amendment, draft planning documents, and a request for consultation.

Per the PA, the Consulting Parties have fifteen (15) calendar days to respond to AFRH with comments, and AFRH seeks comments on this memorandum by 3 September 2021. The memorandum provides instructions for submitting comments.

AFRH appreciates your participation in this consultation process and looks forward to receiving your comments and feedback regarding the proposed Master Plan Amendment #2. Thank you for your time and consideration.

Sincerely,

Justin Seffens
Visit the AFRH website: www.afrh.gov
Like us on Facebook: www.facebook.com/AFRH.gov

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2 attachments

- AFRH-W PA - MPA Highlight.pdf
  1928K

- MPA #2 Early Consultation Memo FINAL 8-20-2021.pdf
  1077K
MEMORANDUM FOR: SEE DISTRIBUTION

SUBJECT: EARLY CONSULTATION ON PROPOSED MASTER PLAN AMENDMENT

In compliance with Section 106 of the National Historic Preservation Act (NHPA) for its campus in Washington, D.C. (AFRH-W) and in accordance with Section IV.C of the 2008 AFRH-W Programmatic Agreement (PA), the Armed Forces Retirement Home (AFRH) requests your review and comment, as a Consulting Party, on a proposed amendment to the AFRH-W Master Plan.

The National Capital Planning Commission (NCPC) approved the original AFRH-W Master Plan in 2008 as well as its first amendment in 2018. In 2019, AFRH-W selected a development team for the private development of Zone A at AFRH-W. The purpose of the second amendment (Amendment #2) is to accommodate minor changes to the plan based on the team’s development proposal, respond to changes in the surrounding neighborhood and current local planning priorities since 2008, and reflect a more robust approach to historic district design guidelines.

In accordance with the PA, this memorandum is distributed to the Consulting Parties to initiate early consultation for Section 106 review of Amendment #2. The memorandum includes a written description of the proposed amendment, draft planning exhibits, and a formal request for consultation.

The AFRH-W PA (as amended in 2015) and the NCPC-approved AFRH-W Master Plan (as amended in 2018) are available for download at https://www.afrh.gov/aboutus/propertydevelopment.

Written Description

Amendment #2 of the AFRH-W Master Plan is specific to Zone A, one of two zones comprising the 272-acre campus, as defined in the approved AFRH-W Master Plan. Zone A is the 80-acre southeastern section of the campus that is proposed for redevelopment. No changes to the other zones (i.e., the AFRH Zone) are proposed.

AFRH developed the original AFRH-W Master Plan between 2004 and 2008. The section of the plan devoted to Zone A is based on the previous development proposal selected by AFRH in 2007. Therefore, the approved plan reflects practices and conditions from well over a decade ago and includes prescriptive guidelines based on the site’s previous development team’s vision.
Since that time, the city and the surrounding neighborhoods have changed along with planning related to transportation, sustainability, and urban design. Approaches to compatibility in a historic district have also evolved. The new Zone A development proposal selected by AFRH in 2019 reflects many of these changes, and ongoing consultation with the DC Office of Planning (OP), NCPC, and DC Historic Preservation Office (HPO) has focused on a need to reflect current conditions and philosophies, as well as anticipated changes to the city. AFRH plans to amend the Master Plan to respond to the selected development team’s proposal and the city’s priorities.

The plan for Zone A largely looks the same as originally approved, and most planning changes are minor. The most substantial changes relate to the design guidelines in an effort to make them less specific to the previous development proposal and more informed by the context of the AFRH-W historic district. The revised guidelines provide improved baseline information and are performance-based to allow HPO and the Historic Preservation Review Board (HPRB) to better understand and respond to the preservation and design objectives for the site. The design guideline revisions also accommodate more flexibility in product type, particularly related to housing on the site.

The proposed amendment includes the following areas of change to the approved AFRH-W Master Plan:

1. **Townhome Guidelines**: The amendment introduces townhomes as a new product type that can be applied on parcels designated for low-rise residential use. The amendment also includes new design guidelines specific to townhomes.

2. **Built Form Guidelines**: The amendment proposes replacement built form guidelines that break the site down into areas called "street edges." This new approach recognizes that different areas of Zone A have different considerations such as relationships with historic resources (built and landscape), visibility from the exterior of the site, function within the new street network, etc. In many cases, the guidelines use previously approved language but add direction on its application. The revised guidelines also better articulate the objectives and existing conditions for each street edge section, clarifying the rational or need for the guidance.

3. "Planning for the Future": The proposed amendment recognizes that the activation of Irving Street is no longer a goal for the future but rather a current priority for both the city and the surrounding community. The amendment removes guidance on Irving Street from this section and weaves it through other parts of the design guidelines. This section has also been revised in response to the ongoing study to reconfigure the cloverleaf interchange at North Capitol and Irving streets.

4. **Parcel M Reconfiguration**: Parcel M is the only parcel that reflects substantial changes to its configuration and the alignment of its surrounding streets. This
reconfiguration creates a more active urban street between Scale Gate and AFRH-W's historic hospital complex, enhances views of the historic Mess Hall, and preserves additional mature trees to the west and south of Parcel M. Revisions to the design guidelines, such as specific height limits and setbacks, ensure that the view corridor to the Forwood Building is retained along the southern edge of Parcel M and that new development is designed to be deferential to the adjacent historic resources.

5. **Irving Street Activation:** The amendment includes a minor reconfiguration of parcels along Irving Street to better address and activate Irving Street and to create a more pedestrian- and bike-friendly environment. This includes the removal of the easternmost vehicular entrance to Zone A, which can be better accommodated if the cloverleaf interchange at Irving Street an North Capitol Street is reconfigured in the future.

6. **Archaeology:** The amendment reflects AFRH-W’s 2014 update to its archaeological assessment, which was completed in close coordination with HPO. The archaeology information in the approved master plan is now obsolete and will be removed. New materials on archaeology will be in compliance with federal law, which prohibits location-specific information on archaeological potential on federal property.

7. **Street Types:** The amendment includes revised street sections and minor changes to the configuration of streets and trails to reflect the city’s current priorities related to multi-modal transportation and activated urban streets. The amendment also references DDOT standards to accommodate the potential public dedication of streets. The only historic preservation issue related to the street types is the street section of Pershing Drive, which is a Contributing resource to the historic district.

8. **Parking:** The amendment provides additional flexibility in how structured parking is accommodated on site and allows a change to specific parcels from below-ground parking to above-ground parking with a focus on parking that is wrapped by programmable space. The amendment retains all original guidance on the design of screened parking with the addition of updated precedent images to supplement that guidance and provide more recent examples of successful screening. Prescriptive height limits for structured parking are revised to be relative to the actual heights of buildings for each parcel. A net decrease in parking is proposed.

9. **Density and Land Use:** The proposed amendment increases the allowable density (from approximately 4.4M sf to 4.9 sf) and redistributes square footage among the various uses proposed for the site. Because the new program includes more residential and less commercial use, the increase in density results in a net decrease in traffic and parking. No changes to approved height limits or reductions in open space are required to accommodate the increase in density.

Page 3 of 24
The proposed amendment will also integrate the previously approved Amendment #1, which added the Heating Plant and approximately 3 acres of land to Zone A and was published as an addendum to the original Master Plan. Amendment #2 provides an opportunity to integrate the previously approved changes into the main body of the plan. Amendment #2 also includes some discrete changes such as updated references to regulations and standards and editorial changes such as typographical error correction and language clarification.

It is important to emphasize that the proposed amendment:

- Will not result in a change to the amount of public open space provided in Zone A;
- Will not result in changes to the approved maximum heights on any parcel in Zone A or any changes to the preservation of Contributing view sheds;
- Will not result in any changes to the plan for adaptive reuse of existing Contributing built resources or the preservation of Contributing landscapes;
- Will not result in changes to the boundary of Zone A and the area available for private development;
- Will not propose changes to the AFRH Zone sections of the Master Plan as approved in 2018 (except information related to archaeology, as noted above); and
- Will not propose additional uses beyond those approved in the 2008 and 2018 versions of the Master Plan.

Draft Planning Exhibits
The following draft planning exhibits are enclosed with this memorandum:
1. Revised Base Plan for Zone A: Summary and Comparison of Original and Revised Parcel Configurations
2. Townhome Guidelines: Summary
3. Built Form Guidelines: Summary and Street Edge Map
4. "Planning for the Future": Revised Graphic of Adaptability Plan
5. Parcel M Reconfiguration: Revised Plan, Street Views, and Summary of Related Guidelines
6. Irving Street Activation: Summary and Revised Plan
7. Archaeology: Revised Text
8. Street Types: Comparison of Original and Revised Pershing Drive Street Sections
9. Parking: Summary
10. Density and Land Use: Revised Development Program Table
11. Assessment of Effects Matrix

Request for Consultation
AFRH invites comments regarding this upcoming Amendment #2 from all Consulting Parties. Following AFRH’s receipt and consideration of your comments, the agency will proceed with further Section 106 consultation with the Signatories of the AFRH-W PA (NCPC, the Advisory Council on Historic Preservation, the HPO, etc.).
and the National Park Service) in accordance with the process outlined in Section IV of the PA. The amendment process will conclude with a formal review of the amendment by NCPC, which will provide another opportunity for public input including testimony at the NCPC public meeting.

Please also note that the proposed amendment will require compliance with the National Environmental Protection Act (NEPA) prior to final review by NCPC. As such, AFRH will finalize a Supplemental Environmental Impact Statement (SEIS) and intends to distribute a draft of the SEIS to the public for review and comment in December 2021.

In accordance with the PA, the Consulting Parties have fifteen (15) calendar days to respond to AFRH with comments. Please transmit your comments by email by **Friday, September 3, 2021**, using the following contact information:

comments@afrh.gov

Please make sure that the subject line of your email reads: "**MPA #2 Comments**."

A copy of this memorandum is posted on the AFRH website:

https://www.afrh.gov/aboutus/propertydevelopment

AFRH will post all Consulting Party comments on this website. Consulting Parties can find copies of the AFRH-W Master Plan, AFRH-W Historic Preservation Plan, AFRH-W Programmatic Agreement, and previous Section 106 and NEPA documentation on the website for reference. Please also visit the AFRH Information and Inventory Resource System (IRIS) if additional information is needed regarding the resources included in the Heating Plant Parcel (www.AFRH-IRIS.com).

AFRH appreciates your participation in this consultation process and looks forward to receiving your comments and feedback regarding the proposed Master Plan Amendment. Thank you for your time and consideration.

Sincerely,

Justin Seffens
Federal Preservation Officer and Corporate Facility Manager
Armed Forces Retirement Home

Enclosures:
- Exhibits

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DISTRIBUTION:

- National Capital Planning Commission
- Advisory Council on Historic Preservation
- U.S. National Park Service
- D.C. Historic Preservation Office
- U.S. Commission of Fine Arts
- D.C. Office of Planning
- National Trust for Historic Preservation
- D.C. Preservation League
- Committee of 100 on the Federal City
- Rock Creek Cemetery Association
- St. Paul's Episcopal Church
- Advisory Neighborhood Commission 1A
- Advisory Neighborhood Commission 4C
- Advisory Neighborhood Commission 4D
- Advisory Neighborhood Commission 5A*
- Advisory Neighborhood Commission 5E*
- U.S. Army
- The Catholic University of America
- Ward 1 Councilmember
- Ward 4 Councilmember
- Ward 5 Councilmember
- Military Officer Association of America
- Friends of the Old Soldiers' Home**
- President Lincoln’s Cottage**

AFRH has distributed this correspondence electronically to the Consulting Parties as listed in the PA. Please note that Petworth and Columbia Heights Residents Concerned and United Neighborhood Coalition were listed as Consulting Parties in the PA but do not have current contact information available.

*The relevant ANCs have been revised based on recent ANC map changes.
**Two additional Consulting Parties identified since the 2008 PA are indicated.
AFRH-W Master Plan Amendment #2 - Early Consultation Comments

Carrie Barton <carrie.barton@preservescapes.com>  
Mon, Sep 13, 2021 at 10:54 AM

To: David Maloney <david.maloney@dc.gov>, Tim Dennee <timothy.dennee@dc.gov>, "Kathryn G. Smith" <kathryn_smith@nps.gov>, Katharine Kerr <kkerr@achp.gov>, "Webb, Lee" <lee.webb@ncpc.gov>, "Herr, Jamie" <jamie.herr@ncpc.gov>, "Sullivan, Diane" <diane.sullivan@ncpc.gov>
Cc: Stacey Tyley <stacey.tyley@afrh.gov>, Tim Sheckler <tim.sheckler@gsa.gov>, Justin Seffens <justin.seffens@afrh.gov>, "Combal, Martine" <martine.combal@am.jll.com>, "Finelli, Nick" <Nick.Finelli@am.jll.com>

All,

Please see attached a summary of the comments received during Early Consultation for AFRH-W Master Plan Amendment #2. The comments are summarized in tables, and copies of the original correspondence are included as attachments to the summary for your reference. We will be discussing these comments during tomorrow's Signatory meeting at 4:00. Please let us know if you have any questions before tomorrow's discussion.

We look forward to speaking with all of you tomorrow.

Thanks,
Carrie

Carrie Barton
PRESERVE / scapes
mobile: (202) 309-5281 / email: carrie.barton@preservescapes.com / www.preservescapes.com

MPA #2 Early Consultation - Consulting Party Comment Summary.pdf
2246K
The following table (Table 1) includes a summary of the comments received from Consulting Parties during the comment period for early consultation for AFRH-W Master Plan Amendment #2. The Early Consultation Memorandum for the proposed amendment was distributed electronically to Consulting Parties on 20 August 2021 pursuant to the process stipulated in the AFRH-W Programmatic Agreement. The exact language of the comments is included in Table 2.

Table 1: Consulting Party Comment Summary

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</tr>
<tr>
<td>ANC 1A</td>
<td>09/08/2021</td>
<td>• Comment on parking</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Comments on inclusion of the Heating Plant (already approved in Amendment #1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Comment on density and impact of more residential use on the Heating Plant.</td>
</tr>
<tr>
<td>ANC 5A (see Attachment C)</td>
<td>09/01/2021</td>
<td>Support, no comment</td>
</tr>
<tr>
<td>Arlington National Cemetery (see Attachment D)</td>
<td>09/08/2021</td>
<td>No comment</td>
</tr>
<tr>
<td>Committee of 100 on the Federal City (see Attachment E)</td>
<td>08/30/2021</td>
<td>• Support</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Comment on archaeology language (recommendations v. requirements)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Comment on the street edge guidance related to the delineation of the historic pasture and need to clarify objectives.</td>
</tr>
<tr>
<td>National Capital Planning Commission (see Attachment F)</td>
<td>09/08/2021</td>
<td>No comment</td>
</tr>
<tr>
<td>National Park Service (see Attachment G)</td>
<td>09/01/2021</td>
<td>No comment</td>
</tr>
</tbody>
</table>

The following table provides all Consulting Party comments for review. Copies of all original correspondence are included as attachments.
<table>
<thead>
<tr>
<th>Consulting Party</th>
<th>Date Received</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Advisory Council on Historic Preservation</td>
<td>09/01/2021</td>
<td>While we have no comments regarding the second amendment to the Master Plan, we remain available to provide our advisory opinions in the event of a dispute during the 2008 PA’s implementation.</td>
</tr>
<tr>
<td>2 ANC 1A</td>
<td>09/08/2021</td>
<td>Related to the Section 106 review, ANC1A has no objection to the inclusion of Townhomes, the reconfiguration of Parcel M, or other areas not specifically addressed in this response.</td>
</tr>
<tr>
<td>3 ANC 1A</td>
<td>09/08/2021</td>
<td>ANC1A notes that the amendment proposes to change planned underground parking to above ground facilities. We understand that this is a less costly way to proceed. We also note that the amendment states that overall parking demand will be less due to the density and land use changes. However, a key and historic feature of the AFRH-W is open green space and meadows. With this in mind, shifting parking to above ground facilities is contrary to the historic nature of the AFRH-W and every effort needs to be taken to preserve and maintain as much green space as possible – including strategies that discourage and minimize the need to draw traffic to and from the campus. With this in mind, we do not support surface parking lots or an increase in the above ground-built environment to house cars. This would have a significant negative impact on the historic nature of the AFRH-W.</td>
</tr>
<tr>
<td>4 ANC 1A</td>
<td>09/08/2021</td>
<td>In general, ANC1A is not opposed to the new building program that includes more residential and less commercial uses or the additional density. We recognize that residential uses are in many ways preferable to commercial uses by reducing destination traffic to the campus. However, as this amendment seeks to incorporate changes approved in Amendment #1, we do have general concerns related to preserving historic viewsheds, maintaining as low a profile as possible in the overall building types, and preserving as much greenspace as possible. More specifically, we feel that the shift from commercial to residential uses may have a negative impact on the Heating Plant added to Zone A in Amendment #1 without</td>
</tr>
</tbody>
</table>
### Consulting Party | Date Received | Comment
--- | --- | ---
| | | additional protections to prevent further degradation of the AFRH-W’s historic resources, which we address below.
| 5 ANC 1A (see Attachment B) | 09/08/2021 | ANC1A supports the overall reactivation of the 1907 Power House (Building 46) designed by Capt. John S. Sewell of the Corps of Engineers within the overall amendment plan provided additional steps are taken to minimize negative impacts on this historic resource (listed below). The ANC sees the potential benefits of adaptively reusing the historically contributing buildings associated with the central heating plant in Zone A, but does not agree that doing so will be without negative impacts to the historical integrity of the 1907 Power Plant without a stronger commitment to its protection and preservation. As a purpose-built utilitarian power plant building, many observers are unlikely to understand the importance of the structure or recognize that it is a scarce building type in the District of Columbia. Therefore, ANC1A requests that the following actions be considered as part of the Amendment process: We request that the 1907 Power Plant be reviewed and put forward for consideration as a landmarked structure. Early Twentieth Century power plant structures are scarce in D.C., with ANC1A only being aware of a similar building on the campus of Catholic University. These structures were necessary for the support of their respective campuses, especially as they existed in what was then largely undeveloped rural areas of D.C. with no access to city-wide services. These plants were required for each campus to be self-sufficient. Furthermore, in the case of AFRH-W, the power plant was a critical element not just for residency, but also for the modern operation of the AFRH-W hospitals.
| 6 ANC 1A | 09/08/2021 | We equally request that a history story board...
### Consulting Party

<table>
<thead>
<tr>
<th>Consulting Party</th>
<th>Date Received</th>
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<tbody>
<tr>
<td>(see Attachment B)</td>
<td></td>
<td>or some other information marker be included near the Power Plant to contextualize the importance of this building and make its history accessible to future residents of the campus and Zone A development.</td>
</tr>
<tr>
<td>7 ANC 1A (see Attachment B)</td>
<td>09/08/2021</td>
<td>In addition to the Power House’s scarce building type, its preservation is important in the broader context of construction of Government facilities at the AFRH-W and beyond. By the time Capt. John S. Sewell of the Corps of Engineers resigned from his post in April 1907, he had overseen the construction of the AFRH-W mess hall, power house, and other buildings of the campus as well as the new government printing office, extensive improvements to the Washington Barracks reservation, managed construction of the Army War College, and construction of the new building for the Department of Agriculture. The history and preservation of these structures collectively is important. ANC1A looks forward to our continued engagement in the development of Zone A, and to the additional meetings, reviews, and conversations that need to occur to address our additional concerns related to housing affordability, equitable access to green space, improving connectivity to the campus, and mitigating traffic impacts.</td>
</tr>
<tr>
<td>8 ANC 5A (see Attachment C)</td>
<td>09/01/2021</td>
<td>Our preliminary review suggest that the proposed changes are consistent with the overall development plans, including the envisioned Cloverleaf at North Capital and Irving, and are reflective of welcomed improvements that can be supported by the community. As such, in accordance with Section IV.c2 of the 2008 AFRH-W Programmatic Agreement (PA), ANC5A support the proposed changes and is pleased to submit the following comments regarding AFRH’s Proposed Masterplan Amendment. Please be advised that, due to legislative restrictions, ANCs are generally unable to make official decisions within 15 days. As such, ANC5A respectfully ask that this response be accepted as our preliminary response pending final approval at our next regularly scheduled meeting on September 22, 2021.</td>
</tr>
<tr>
<td>Consulting Party</td>
<td>Date Received</td>
<td>Comment</td>
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<tr>
<td>------------------</td>
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<tr>
<td>9 Arlington National Cemetery (see Attachment D)</td>
<td>09/08/2021</td>
<td>The proposed areas of change to the Master Plan will have no effect on the Soldiers’ and Airmen’s Home National Cemetery, a property eligible for the National Register of Historic Places and owned and managed by the Department of the Army.</td>
</tr>
<tr>
<td>10 Committee of 100 on the Federal City (see Attachment E)</td>
<td>08/30/2021</td>
<td>We are pleased to see the considerable attention to detail incorporated in this Master Plan Amendment, respectful as it is of the wonderful resource the AFRH-W campus is and pleased to participate in this early consultation process on the proposed MPA amendment.</td>
</tr>
<tr>
<td>11 Committee of 100 on the Federal City (see Attachment E)</td>
<td>08/30/2021</td>
<td>Specific Design Objectives, Pasture Street Edge, pg. 11: The language used, &quot;delineate and emphasize the historic pasture,&quot; may be too vague to be evaluated. Is the intention to isolate the pasture from the townhouses, or to blend the back yards of the townhouses with the pasture? &quot;Delineate…the pasture&quot; does not appear to state with sufficient clarity what the goal is here and more guidance on this point would make it easier for the developer to see what the goal is, and for meaningful evaluation of whether or not it has succeeded. For example, if isolation of the pasture from the townhouses is intended, perhaps there should be language about blocking the view of the townhouses from the pasture and vice-versa, or, on the contrary, if the yards of the townhouses are intended to blend directly into the yards, some guidance telling the developer how to “delineate” more clearly, to the end of avoiding confusion on what is the desired outcome.</td>
</tr>
<tr>
<td>12 Committee of 100 on the Federal City (see Attachment E)</td>
<td>08/30/2021</td>
<td>Exhibit 7: Archaeology, page 17: The revised language concerning archaeological assessment contains this</td>
</tr>
</tbody>
</table>
### S106 Record Exhibit C

<table>
<thead>
<tr>
<th>Consulting Party</th>
<th>Date Received</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>phrase: &quot;...archeological monitoring is recommended during construction and ground disturbing activity in some areas of the development.&quot; The use of the word &quot;recommended&quot; is questionable here: how could any &quot;recommended monitoring&quot; be evaluated as this language does not require monitoring. If archaeological monitoring is desired, and clearly it is, should this language not be replaced by something more useful and capable of evaluation? Such language might be something like &quot;...archaeological monitoring by supervisors of contractors engaged in earth moving in some areas will be undertaken and include educating project leaders about what might constitute significant archaeological remains that could possibly be uncovered during construction, along with instructions about reporting any such discoveries.&quot; Without stronger language than the word &quot;recommended,&quot; there is no basis for evaluating whether the contractors took any heed at all of the archaeological element of the HPA involved in contractual obligations. While previous study has not found it likely that there are significant archaeological resources on the property, clearly the intention of the MPA should be to proceed with appropriate care, just in case there are.</td>
</tr>
<tr>
<td>National Capital Planning Commission (see Attachment F)</td>
<td>09/08/2021</td>
<td>We do not have any comments at this time, but we look forward to participating in the process to update both the Master Plan and the PA, and the ongoing stakeholder engagement.</td>
</tr>
<tr>
<td>National Park Service (see Attachment G)</td>
<td>09/01/2021</td>
<td>At this stage I see no Master Plan revisions that would affect the &quot;U.S. Military Asylum, Old Soldier’s Home&quot; National Historic Landmark district (designated 1973) located in the northern section of the AFRH-W campus, thus I have no comments. Please keep me advised of the progress of this consultation and reach out if potential adverse effects to the NHL district are anticipated.</td>
</tr>
</tbody>
</table>

**Consultation Notes:**

- The following Consulting Parties requested an extension to submit official comments: National Capital Planning Commission, Friends of the Old
Soldiers’ Home, ANC 1A, and Arlington National Cemetery. Note that ANC 5A provided a reply that will be formalized at the commission meeting on 9/22/21.
• The following Consulting Parties did provide a written response to the Early Consultation Memorandum:
  - D.C. Historic Preservation Office
  - U.S. Commission of Fine Arts
  - D.C. Office of Planning
  - National Trust for Historic Preservation
  - D.C. Preservation League
  - Advisory Neighborhood Commission 4C
  - Advisory Neighborhood Commission 4D
  - Advisory Neighborhood Commission 5E
  - U.S. Army
  - The Catholic University of America
  - Ward 1 Councilmember
  - Ward 4 Councilmember
  - Ward 5 Councilmember
  - Military Officer Association of America
  - Friends of the Old Soldiers’ Home
  - President Lincoln’s Cottage
ATTACHMENT A:

September 1, 2021

Mr. Justin Seffens  
Federal Preservation Officer and Corporate Facility Manager  
Armed Forces Retirement Home  
3700 North Capitol Street, NW  
Sherman Building – Room 210  
Washington, DC  20011-8400

Ref: Amendment #2 to the Master Plan Regarding Redevelopment at the Armed Forces Retirement Home - Washington Campus  
Washington, District of Columbia  
ACHP Project Number: 017364

Dear Mr. Seffens:

In August 2021, the Advisory Council on Historic Preservation (ACHP) received your notification regarding the referenced action in accordance with Stipulation IV(C) of the Programmatic Agreement Among the Armed Forces Retirement Home, National Park Service, the National Capital Planning Commission, the Advisory Council on Historic Preservation, and the District of Columbia State Historic Preservation Officer Regarding the Armed Forces Retirement Home - Washington, D.C. Master Plan and On-Going Maintenance and Rehabilitation of Historic and Cultural Resources and Development Activities (2008 PA as amended). While we have no comments regarding the second amendment to the Master Plan, we remain available to provide our advisory opinions in the event of a dispute during the 2008 PA’s implementation.

Should you have any questions or require additional assistance, please contact Ms. Katharine R. Kerr at (202) 517-0216 or by e-mail at kkerr@achp.gov and reference the ACHP Project Number above.

Sincerely,

Jaime Loichinger  
Assistant Director  
Office of Federal Agency Programs

Page 8 of 16
ATTACHMENT B:

ADVISORY NEIGHBORHOOD COMMISSION 1A

SMD IA01 – Layla Bonnet
SMD IA04 – Chris Hall
SMD IA07 – Mehra Ghapade
SMD IA10 – Rashida Brown

SMD IA02 – Dieter Lehmann Morales
SMD IA05 – Christine Miller
SMD IA08 – Kent C. Buss
SMD IA11 – Dorit Love Wade

SMD IA03 – Vacant
SMD IA06 – Brandon Barnett
SMD IA09 – Michael Wray
SMD IA12 – Vacant

September 8, 2021
(via email only)

Justin Seffens
Corporate Facility Manager
Armed Forces Retirement Home – Washington
3700 N. Capitol Street
Washington, DC 20011

Re: MPA #2 Comments – Response to Section 106 Review for AFRH-W

Dear Mr. Seffens,

Advisory Neighborhood Commission 1A, as a Consulting Party to the AFRH-W Master Plan, has reviewed the documents related to the Master Plan Amendment #2 which proposes to fine tune and adjust Zone A of the Master Plan. Upon review of the Amendment we voted unanimously at a publicly noticed meeting held on September 8, 2021, to submit the following comments related to the historic aspects of the project – with the understanding that we have additional areas of concern beyond preservation that will need to be addressed before the project moves forward.

Related to the Section 106 review, ANC1A has no objection to the inclusion of Townhomes, the reconfiguration of Parcel M, or other areas not specifically addressed in this response. Three areas where specific preservation concerns exist follow.

Parking

ANC1A notes that the amendment proposes to change planned underground parking to above ground facilities. We understand that this is a less costly way to proceed. We also note that the amendment states that overall parking demand will be less due to the density and land use changes. However, a key and historic feature of the AFRH-W is open green space and meadows. With this in mind, shifting parking to above ground facilities is contrary to the historic nature of the AFRH-W and every effort needs to be taken to preserve and maintain as much green space as possible – including strategies that discourage and minimize the need to draw traffic to and from the campus. With this in mind, we do not support surface parking lots or an increase in the above ground-built environment to house cars. This would have a significant negative impact on the historic nature of the AFRH-W.

Advisory Neighborhood Commission 1A
3800 11th Street NW, #200
Washington, DC 20010

Page 9 of 16
ANC1A - MPA#2 COMMENTS - RESPONSE TO SECTION 106 REVIEW FOR AFRH-W

September 8, 2021
Page 2

Density and Land Use

In general, ANC1A is not opposed to the new building program that includes more residential and less commercial uses or the additional density. We recognize that residential uses are in many ways preferable to commercial uses by reducing destination traffic to the campus. However, as this amendment seeks to incorporate changes approved in Amendment #1, we do have general concerns related to preserving historic viewsheals, maintaining as low a profile as possible in the overall building types, and preserving as much green space as possible. More specifically, we feel that the shift from commercial to residential uses may have a negative impact on the Heating Plant added to Zone A in Amendment #1 without additional protections to prevent further degradation of the AFRH-W’s historic resources, which we address below.

1907 Power Plant Building

ANC1A supports the overall reactivation of the 1907 Power House (Building 46) designed by Capt. John S. Sewell of the Corps of Engineers within the overall amendment plan provided additional steps are taken to minimize negative impacts on this historic resource (listed below).

The ANC sees the potential benefits of adaptively reusing the historically contributing buildings associated with the central heating plant in Zone A, but does not agree that doing so will be without negative impacts to the historical integrity of the 1907 Power Plant without a stronger commitment to its protection and preservation. As a purpose-built utilitarian power plant building, many observers are unlikely to understand the importance of the structure or recognize that it is a scarce building type in the District of Columbia. Therefore, ANC1A requests that the following actions be considered as part of the Amendment process:

- We request that the 1907 Power Plant be reviewed and put forward for consideration as a landmarked structure. Early Twentieth Century power plant structures are scarce in D.C., with ANC1A only being aware of a similar building on the campus of Catholic University. These structures were necessary for the support of their respective campuses, especially as they existed in what was then largely undeveloped rural areas of D.C. with no access to city-wide services. These plants were required for each campus to be self-sufficient. Furthermore, in the case of AFRH-W, the power plant was a critical element not just for residency, but also for the modern operation of the AFRH-W hospitals.
- We equally request that a history story board or some other information marker be included near the Power Plant to contextualize the importance of this building and make its history accessible to future residents of the campus and Zone A development.

In addition to the Power House’s scarce building type, its preservation is important in the broader context of construction of Government facilities at the AFRH-W and beyond. By the time Capt. John S. Sewell of the Corps of Engineers resigned from his post in April 1997, he had overseen the construction of the AFRH-W mess hall, power house, and other buildings of the campus as well as the new government printing office, extensive improvements to the Washington Barracks reservation, managed construction of the Army War College, and construction of the new...
ANCIA – MPA#2 Comments – Response to Section 106 Review for AFRH-W
September 8, 2021
Page 3

building for the Department of Agriculture. The history and preservation of these structures collectively is important.

ANCIA looks forward to our continued engagement in the development of Zone A, and to the additional meetings, reviews, and conversations that need to occur to address our additional concerns related to housing affordability, equitable access to green space, improving connectivity to the campus, and mitigating traffic impacts.

Kent Boese, ANC IA Chair
SMD 1A08

CC: comments@afh.gov
Carrie Barton – carrie.barton@preservescapes.com

Page 11 of 16
ATTACHMENT C:

From: Edwards, Ronnie (SMD 5A05) <5A05@anc.dc.gov>
Sent: Wednesday, September 1, 2021 6:58 PM
To: Comments <Comments@afth.gov>
Subject: ANC5A Preliminary Response to Proposed Master Plan Amendment

First, I would like to express my sincere appreciation to Armed Forces Retirement Home (AFRH) management for keeping the community informed and updated regarding proposed development of Ward Five (5) properties that are located within Advisory Neighborhood Commission 5A.

Our preliminary review suggest that the proposed changes are consistent with the overall development plans, including the envisioned Clarendon at North Capital and Irving, and are reflective of welcomed improvements that can be supported by the community.

As such, in accordance with Section IV.c2 of the 2008 AFRH-W Programmatic Agreement (PA), ANC5A support the proposed changes and is pleased to submit the following comments regarding AFRH's Proposed Masterplan Amendment.

Please be advised that, due to legislative restrictions, ANCs are generally unable to make official decisions within 15 days. As such, ANC5A respectfully ask that this response be accepted as our preliminary response pending final approval at our next regularly scheduled meeting on September 22, 2021 (6:45pm).

If possible, we invite AFRH representatives to attend the September 22nd Virtual meeting. Please confirm availability.

Thanks in advance for acknowledgment and response.

Ronnie Edwards, Chairman
Advisory Neighborhood Commission 5A
(202) 607-4717

Sent from my iPhone
CONFIDENTIALITY NOTICE: This message (including any attachments) is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.
ATTACHMENT D:

Stevens, Rebecca L. CV (USA) <rebecca.l.stevens35.civ@mail.mil> Wed, Sep 8, 2021 at 12:32 PM
To: "Justin Selfens" <Justin.Selfens@arth.gov>
Cc: "Carrie Barton (carrie.barton@preservescapes.com)" <carrie.barton@preservescapes.com>, "Sullivan, Agnes K CV USARMY HGDA ANC OSA (USA)" <agnes.k.sullivan.civ@mail.mil>

Sir,

Arlington National Cemetery, a Section 106 Consulting Party to the AFRH-W Master Plan, reviewed the proposed amendment and have no comments. The proposed areas of change to the Master Plan will have no effect on the Soldiers' and Airmen's Home National Cemetery, a property eligible for the National Register of Historic Places and owned and managed by the Department of the Army.

Thank you for the early opportunity to review and comment on the proposed changes to the plan.

Rebecca

Rebecca L. Stevens, MA
Cultural Resources Manager
Arlington National Cemetery
1 Memorial Avenue
Arlington, Virginia 22211
ATTACHMENT E:

From: Kirby Vining <kirby.vining@committeeof100.net>
Sent: Monday, August 30, 2021 8:40 PM
To: Comments <Comments@afrh.gov>
Subject: C100: MPA #2 - Comments from the Committee of 100 on the Federal City - Kirby Vining

Dear Mr. Sellins,

On behalf of the Historic Preservation Subcommittee of the Committee of 100 on the Federal City, a Consulting Party to the Sec. 106 process for the AFRH-W development, thank you for bringing this to our attention. We are pleased to see the considerable attention to detail incorporated in this Master Plan Amendment, respectful as it is of the wonderful resource the AFRH-W campus is and pleased to participate in this early consultation process on the proposed MPA amendment.

I have enumerated below two points, arguably in the form of questions, that occur to us when we reviewed MPA #2. Those questions/comments are below, and we look forward to participating in the Sec. 106 process for the AFRH-W redevelopment.

Specific Design Objectives. Pasture Street Edge, pg. 11:
- The language used, "delineate and emphasize the historic pasture," may be too vague to be evaluated. Is the intention to isolate the pasture from the townhouses, or to blend the back yards of the townhouses with the pasture? "Delineate...the pasture" does not appear to state with sufficient clarity what the goal is here and more guidance on this point would make it easier for the developer to see what the goal is, and for meaningful evaluation of whether or not it has succeeded. For example, if isolation of the pasture from the townhouses is intended, perhaps there should be language about blocking the view of the townhouses from the pasture and vice-versa, or, on the contrary, if the yards of the townhouses are intended to blend directly into the yards, some guidance telling the developer how to "delineate" more clearly, to the end of avoiding confusion on what is the desired outcome.

Exhibit 7: Archaeology, page 17
The revised language concerning archaeological assessment contains this phrase:

"...archaeological monitoring is recommended during construction and ground disturbing activity in some areas of the development."

The use of the word "recommended" is questionable here: how could any "recommended monitoring" be evaluated as this language does not require monitoring. If archaeological monitoring is desired, and clearly it is, should this language not be replaced by something more useful and capable of evaluation? Such language might be something like..."archaeological monitoring by supervisors of contractors engaged in earth moving in some areas will be undertaken and include educating project leaders about what might constitute significant archaeological remains that could possibly be uncovered during construction, along with instructions about reporting any such discoveries."

Without stronger language than the word "recommended," there is no basis for evaluating whether the contractors took any heed at all of the archaeological element of the HPA involved in contractual obligations. While previous study has not found it likely that there are significant archaeological resources on the property, clearly the intention of the MPA should be to proceed with appropriate care, just in case there are.

Thank you, and we look forward to the Sec. 106 process and approval of the MPA #2.

-Kirby Vining, Chair, C100.

http://committeeof100.net/
https://twitter.com/Commof100DC
https://www.linkedin.com/company/committee-of-100-on-the-federal-city/about/

Page 14 of 16
ATTACHMENT F:

From: Herr, Jamie <Jamie.Herr@ncpc.gov>
Sent: Wednesday, September 8, 2021 4:15 PM
To: Comments
Cc: Webb, Sean; Sullivan, Diane; Phil, Matthew
Subject: MPA #2 Comments

Thank you so much for the opportunity to review the MPA #2 Early Consultation Memo and the existing AFRH PA. We do not have any comments at this time, but we look forward to participating in the process to update both the Master Plan and the PA, and the ongoing stakeholder engagement.

Thanks
Jamie

Jamie E. Herr, AICP, LEED-AP
Community Planner
Urban Design & Plan Review Division
National Capital Planning Commission
401 9th Street, NW | Suite 500 | Washington, DC 20004
Mains: 202.482.7200 | Direct: 202.482.7208 | Cell: 301.928.6129
www.ncpc.gov | Facebook | Twitter | Instagram

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ATTACHMENT G:

Smith, Kathryn G <Kathryn_Smith@nps.gov>  
Wed, Sep 1, 2021 at 3:31 PM

Cc: Justin Seffens <justin.seffens@afaf.gov>, Carrie Barton <carrie.barton@preservescapes.com>, "Gossett, Tanya" <Tanya.Gossett@nps.gov>, "Kuegler, Bradley A" <Bradley_Kuegler@nps.gov>, "Bartolomeo, Nick" <Nick_Bartolomeo@nps.gov>

Mr. Seffens:

Thank you for the opportunity to review the early consultation memo on the proposed Master Plan Amendment for the Armed Forces Retirement Home Washington (AFRH-W) Campus. At this stage I see no Master Plan revisions that would affect the "U.S. Military Asylum, Old Soldier’s Home" National Historic Landmark district (designated 1973) located in the northern section of the AFRH-W campus, thus I have no comments. Please keep me advised of the progress of this consultation and reach out if potential adverse effects to the NHL district are anticipated.

Sincerely,
Kathryn

Kathryn G. Smith
National Historic Landmarks & National Register Coordinator
National Park Service
Interior Region 1 - National Capital Area
202.619.7180
202.613.3859 mobile

1100 Ohio Drive, SW
Washington, DC 20242
kathryn_smith@nps.gov
Pronouns: She/Her

NCA Website https://www.nps.gov/RE3SNCR
NHL Website http://www.nps.gov/nhl
Facebook National Historic Landmark Program - NPS
Instagram NationalHistoricLandmarkNPS #NationalHistoricLandmark #FindYourPark
AFRH-W Master Plan Amendment #2 - Early Consultation Comments

Carrie Barton <carrie.barton@preservescapes.com> Thu, Sep 16, 2021 at 8:53 AM
To: David Maloney <david.maloney@dc.gov>, Tim Dennee <timothy.dennee@dc.gov>, "Kathryn G. Smith" <kathryn_smith@nps.gov>, Katharine Kerr <kkerr@achp.gov>, "Webb, Lee" <lee.webb@ncpc.gov>, "Herr, Jamie" <jamie.herr@ncpc.gov>, "Sullivan, Diane" <diane.sullivan@ncpc.gov>
Cc: Stacey Tyley <stacey.tyley@afrh.gov>, Tim Sheckler <tim.sheckler@gsa.gov>, Justin Seffens <justin.seffens@afrh.gov>, "Combal, Martine" <martine.combal@am.jll.com>, "Finelli, Nick" <nick.finelli@am.jll.com>, Emily Eig <emily.eig@traceries.com>, Sarah Vonesh <sarah.vonesh@traceries.com>, "Hawley, Lauren" <lauren.hawley@perkinswill.com>

All,
Please see attached a summary of Tuesday's Signatory meeting for AFRH-W Master Plan Amendment #2. We appreciate everyone's participation and will keep you updated on the distribution of the draft amendment for review this fall.

Thanks,
Carrie

Carrie Barton

PRESERVE / scapes
mobile: (202) 309-5281 / email: carrie.barton@preservescapes.com / www.preservescapes.com

MPA #2 Signatory Meeting Summary 9-14-21.pdf
1091K
ARMED FORCES RETIREMENT HOME

Master Plan Amendment #2
Signatory Meeting

Date: 14 September 2021
Time: 4:00pm
Location: Conference Call

Attendees
PA Signatories
Kathryn Smith (NPS)
Tim Dennee (DCSHPO)
Jamie Herr (NCPC)
Diane Sullivan (NCPC)

AFRH Representatives
Stacey Tyley (AFRH)
Tim Sheckler (GSA)
Martine Combal (JLL)
Nick Finnelli (JLL)
Carrie Barton (PRESERVE/scapes)

Development Team Representatives
Emily Eig (EHT Traceries)
Sarah Vonesh (EHT Traceries)
Lauren Hawley (Perkins + Will)

AGENDA

I. Review Purpose and Scope of Amendment
II. Review Amendment Process
III. Review Consulting Party Comments
IV. Discuss Signatory Comments
V. Discuss Next Steps and Timeline
Summary

1. The Signatories had no comments on the Consulting Party responses to the Early Consultation Memorandum.

2. The Signatories had no additional comments on the Early Consultation Memorandum or the scope of Master Plan Amendment #2.

3. NPS inquired about whether AFRH plans to amend the Programmatic Agreement (PA).
   a. AFRH clarified that AFRH may eventually proceed with an amendment to the PA that is consistent with the PA amendment scope that was proposed in September 2015. Such a PA amendment is unrelated to the current Master Plan Amendment, and there are no specific plans for a PA amendment at this time. A PA amendment is not required to accommodate the current Master Plan Amendment.

4. AFRH will follow up with DCSHPO on specific language for the revised design guidelines consistent with the revisions outlined the Early Consultation Memorandum.

NEXT STEPS

- AFRH will post responses to the Consulting Party comments on AFRH’s website and notify the Consulting Parties.
- AFRH intends to distribute a draft amendment to the signatories to review in late fall.
- Per the PA, signatories will have 30 days to provide comments to AFRH on the draft amendment.
- AFRH intends to distribute the draft Supplemental Environmental Impact Statement (SEIS) for public comment in December.
- AFRH will incorporate comments from the signatories into a final amendment, which will be submitted to NCPC for review and approval. AFRH intends to submit the amendment to NCPC for review in February for formal review by the Commission in March.
Dear AFRH-W PA Signatories,

On behalf of the Armed Forces Retirement Home, we are submitting the attached draft documents for Master Plan Amendment #2 for your review. The draft reflects the scope of the amendment that we presented to you in August and that was discussed at our meeting in September. There were some revisions to the Parcel M configuration as noted in these materials.

A summary of the draft amendment is provided in the cover document, which is accompanied by three exhibits that present the text and graphics of the amendment separately. If needed for reference, you can access the current (2018) version of the Master Plan at: AFRH Master Plan (with Amendment #1). Please let us know if you have any issues opening the files.

This review is part of the Section 106 review process for master plan amendments as stipulated in the AFRH-W PA. The review period for the draft is 30 days, and we are asking for comments by Friday, April 8, 2022. All comments can be sent by email to comments@afrh.gov. Once we receive and incorporate comments, we plan to submit the final version to NCPC in April for review in June. The PA does not call for a meeting to accompany this review, but please let us know if you have any questions or if it would be helpful to have a meeting to discuss the draft amendment.

Please do not hesitate to reach out with any questions. We appreciate your continued support in this amendment effort and look forward to your comments.

Thanks,
Carrie

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PRESERVE / scapes
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ARMED FORCES RETIREMENT HOME - WASHINGTON

Master Plan Amendment #2

Section 106 Review of Draft Amendment

March 9, 2022

The Armed Forces Retirement Home (AFRH) presents the attached draft of Master Plan Amendment #2 for review by the Signatories of the AFRH-W Programmatic Agreement (PA) including the National Capital Planning Commission (NCPC), the National Park Service (NPS), the DC State Historic Preservation Office (DCSHPO), and the Advisory Council on Historic Preservation (ACHP). Review of this draft is consistent with the Section 106 review process for Master Plan Amendments as stipulated in the PA.

Submission Contents

The draft Master Plan Amendment #2 is presented for your review as follows:

1) Exhibit A – Amendment Text: The first document in the submission provides a clean version of the full text of the AFRH-W Master Plan as revised for the amendment.

2) Exhibit B – Amendment Text Revisions: The second document in the submission provides the full text of the AFRH-W Master Plan with proposed revisions shown in track changes and a summary table of all substantive changes by section.

3) Exhibit C – Amendment Graphics: The third document in the submission presents all new graphics to be included in the amendment. Where the new graphic replaces an original graphic, a comparison between old and new is provided for your convenience, along with the original Master Plan page number, a description of the purpose of the graphic, and a description of the revision.

It is important to note that many of the graphic revisions and some text revisions are related solely to the incorporation of the Heating Plant parcel in Zone A, a change that was approved previously by the Signatories and NCPC in 2018 as part of Master Plan Amendment #1. That first amendment took the form of an addendum, and AFRH is using Amendment #2 as an opportunity to incorporate those changes into the main body of the Master Plan. Please also note that the footprint of the Scott Building is revised on all maps and plans to reflect the previous replacement of that building in 2013.

The text and graphics have been separated for review purposes only. Once AFRH has incorporated all Signatory comments on the draft and finalized the amendment materials, the amendment text and graphics will be compiled into the original format of the AFRH-W Master Plan. AFRH does not seek comments on formatting of these exhibits.

Amendment Scope

The scope of changes shown in this draft is consistent with the scope of changes outlined in the Early Consultation Memorandum, which AFRH distributed to all Section 106 Consulting Parties on August 20, 2021. AFRH received only minor comments from Consulting Parties and the Signatories during the Early Consultation Process. Since that time, AFRH has made one substantive change to the information that was presented in Early Consultation: the configuration of Parcel M in Zone A (and surrounding parcels and streets accordingly) has changed to more closely reflect what was originally approved in the 2008 Master Plan. The revised configuration improves the termination of Scale Gate Road at the historic hospital complex and returns the alignment of Scale Gate to focus on the historic Forwood Building, while ensuring continuous activation along this important corridor. AFRH presented the revised
configuration to several review agencies in January 2022, including the National Capital Planning Commission (NCPC), the Commission of Fine Arts (CFA), and the DC State Historic Preservation Office (SHPO). There was unanimous agreement that the revised configuration is a substantial improvement to the configuration presented in the Early Consultation Memorandum in August 2021.

**Signatory Review Process**
Per the PA, the Signatories have thirty (30) calendar days to review the draft materials and provide comment to AFRH. Please submit comments to comments@afrh.gov by Friday, April 8, 2022. The PA does not stipulate an additional meeting to discuss the draft amendment during the 30-day review period, but please let AFRH know if a meeting would be helpful. After receiving and addressing Signatory comments, AFRH intends to submit the final amendment in April 2022 for formal review by the National Capital Planning Commission (NCPC) for its June 2022 monthly meeting. We appreciate your attention to this review and continued participation in the Master Plan for AFRH-W.
Kathryn Smith
National Historic Landmarks & National Register Coordinator
National Park Service
Interior Region 1 - National Capital Area

Re: AFRH-W Master Plan Amendment #2, Section 106 Consultation - Signatory Draft Review, Response to NPS Comments

The Armed Forces Retirement Home (AFRH) appreciates your comments in response to the draft Master Plan Amendment #2, which were received by AFRH on April 8, 2022. Please see AFRH’s responses below. Please let us know if you have any additional feedback on these responses by April 15, 2022. AFRH intends to submit the final amendment to the National Capital Planning Commission on April 27, 2022.

1. I would like more clarity on what projects will require review due to the potential for adverse effects to the NHL district. It would be helpful to know that the NPS has been and will be notified of any projects in the vicinity of the existing NHL that have the potential to cause adverse effects.

   Per Historic Preservation Standard Operating Procedure #1 (HP SOP #1), as defined in the AFRH-W Historic Preservation Plan (HPP) and Programmatic Agreement (PA), NPS is notified of potential adverse effects to the National Historic Landmark (NHL) in step 4 of the Section 106 review and consultation process for all undertakings at AFRH. AFRH notifies NPS of all non-exempt activities that have potential adverse effects to the NHL. This notification occurs “if AFRH and/or DCSHPO identify an adverse effect to the NHL district or contributing components” and takes place after the submission of an Undertaking Review Request to DCSHPO.

   To-date, AFRH has contacted NPS on the following two undertakings at AFRH:
   - Demolition of the Scott Building and Construction of the New Scott Building
   - Earthquake Repair of the Sherman Building

   In addition, AFRH continues to ensure NPS is included in all general consultations related to the Programmatic Agreement and the Master Plan. To-date, these consultations have included:
   - Programmatic Agreement Amendment #1 (2015)
   - Programmatic Agreement Amendment #2 (2015, not executed)
   - Master Plan Amendment #1 (2017-2018)
   - Master Plan Amendment #2 (2021-2022)

2. Likewise, can AFRH update the consulting parties on the schedule or phasing of the proposed improvements within the AFRH Zone?
AFRH does not currently have a scheduled start date for new development in the AFRH Zone, namely the four new buildings that are proposed in the North-Northeast Subzone. Because these buildings would likely be visible from the NHL, NPS would be contacted once AFRH decides to proceed.

3. It appears that the 1973 NHL nomination included an inadequate boundary to serve as setting to the four buildings called out in that nomination. With what we know today of the property's history and based on current NHL standards, the existing boundary may not accurately encompass the area with national significance. Therefore, for clarity and predictability in management and planning, I urge the AFRH to conduct an NHL update study aimed at updating the NHL documentation and identifying the area that should be recognized as nationally significant.

AFRH appreciates NPS's attention to the national significance of the Home. Because this issue is unrelated to Master Plan Amendment #2 (no proposed Master Plan revisions would have any impact on the AFRH Zone or the historic resources related to the establishment of the U.S. Military Asylum in the 1850s, the national significance for which the NHL was designated), AFRH requests that NPS initiate a separate consultation with the AFRH Federal Preservation Officer (FPO), providing a boundary enlargement proposal and related documentation for the FPO's consideration per 36 CFR 65.8.

4. NPS has not had the opportunity to tour the property and would be interested in doing that at some point in the future.

AFRH is happy to provide a tour of the campus and will work with you to schedule a guided visit at your convenience.

5. Graphics Corrections/Questions:
   p.34 - the revised graphic key seems incomplete or incorrect

   Correction made as noted.

   p.80 - key is missing a key to the colors

   The colors on this graphic appear to differentiate the landscape resources and provide boundaries, but the numbers identify the resources themselves. No revision required.
Re: AFRH-W Master Plan Amendment #2, Section 106 Consultation - Signatory Draft Review, Response to SHPO Comments

The Armed Forces Retirement Home (AFRH) appreciates your thoughtful and thorough comments in response to the draft Master Plan Amendment #2, which were received by AFRH on March 29, 2022. Please see AFRH’s responses below. Please let us know if you have any additional feedback on these responses by April 15, 2022. AFRH intends to submit the final amendment to the National Capital Planning Commission on April 27, 2022. As noted, your comments refer to the page numbers in the track changes version of the amendment text that was provided by AFRH for your review.

1. Thank you for the revisions. Good, helpful, and an improvement over the previous version. Some good principles and some god refraining from being too prescriptive. Also helpfully arranged and explained.

   AFRH appreciates the positive feedback and SHPO’s contribution to improving these guidelines over the last several months.

2. In the archaeology section on page 33: “proabilitiesa” should be replaced with “potential.”

   Correction made as noted.

3. On page 9, can we add to the express objectives the retention of contributing features, as it is stated for the landscape elements (rather than just “encourage the rehabilitation and reuse of historic buildings” and “maintaining the historic character”)? Page 96 does say “contributing buildings shall be adaptively reused.” This seems to confirm that they will be retained, yet “avoid, minimize and mitigate,” while sounding good, subtly undercuts that message by suggesting that there may be alternatives to avoidance when it comes to a major issue like retention of a historic building.

   Outside of the Zone A section of the amendment, revisions have been limited to updating outdated or obsolete information. Substantive revisions have been limited to Zone A. The AFRH-W Programmatic Agreement (PA) requires that all contributing buildings in Zone A be rehabilitated adaptively reused consistent with the Secretary of the Interior’s Standards for Rehabilitation and associated guidelines. AFRH has ensured that this requirement is carried over to the Master Lease with the selected developer. Any deviation from this requirement would trigger Section 106 consultation with SHPO and likely an amendment to the PA in consultation with all other PA Signatories.
Although the PA ultimately dictates what is retained and reused, AFRH will revise the text on page 96 so that the list of contributing buildings is inclusive of all contributing buildings in Zone A, avoiding any confusion and ensuring that the PA and Master Plan are consistent.

4. Page 100, “lympanum” to tympanum.”

Correction made as noted.

5. Page 115 and Page 116. For both residential buildings and commercial building, “Use of canopies or other entry shelters that project out over the sidewalk and allow protected passage from the curbside to the entrance are encouraged but are not required.” Should they be encouraged? Should they go to the curb, which is a violation of the public space rules, or should they comply with the typical projection regulations?

AFRH will revise the text as follows: “Use of canopies or other entry shelters that project out over the sidewalk and allow protected passage from the curbside to the entrance are encouraged but are not required. Entry canopies above building entrances are considered appropriate but are not required.”

6. Page 116. I don’t know that you need to get into the design of ground-floor residential windows. It’s such a commonplace phenomenon that it probably does not require mention or special treatment other than window treatments. (It may be misread to encourage too-prominent basement windows at the ground level, and then we have to get into areaways and window wells.)

AFRH had revised the original text to be less prescriptive but agrees that this section is unnecessary. AFRH will delete the following text in its entirety. “Ground floor windows adjacent to sidewalks, pedestrian paths or along open setbacks adjacent to such pavements must be designed to ensure privacy within the dwelling. Sill heights relative to exterior grade are to be set above eye level, unless fronting onto private area.”

7. Page 116. Are balconies and terraces encouraged, or just allowed in many cases? Elsewhere, you say balconies should be encouraged but recessed (the latter of which I would agree with). Do encouraged terraces include ones on the fronts of buildings? In public space?

AFRH will revise the text as follows: “Terraces, porches, and balconies are a prominent character-defining feature of the historic hospital buildings in Zone A. Although not required, porches, terraces, and balconies are encouraged in all new residential buildings. Terraces at ground level must be screened for privacy. The design and placement of balconies and terraces above ground level shall be contained within the building volume and, to ensure usefulness, shall have a minimum depth of 5 feet and a minimum width of 8 feet. They should be guided by those that are found on the historic buildings in Zone A.” To supplement this text, AFRH will include clear on-site precedent images similar to the following but more clearly presented:
8. The following comments refer to the revised graphics package:

- The revised map on page 19 of the revised illustrations (page 34 of the plan) doesn’t seem to have all of the colors (in the legend) applied to it.
  
  *Correction made as noted.*

- For the revised map on page 21 of the revised illustrations (page 49 of the plan) and for the next couple of pages, you might not want to use the same color (red) for the boundaries and areas described by them, such as the NNE subzone.
  
  *AFRH will look at all of the zone and subzone maps and consider whether a different color scheme is helpful.*
III. NEPA Documentation
IV. AFRH-W Master Plan, Amended 2022