



ARMED FORCES RETIREMENT HOME
Agency Facility Manager
3700 North Capitol Street, NW
Sherman Bldg. – Room 210
Washington, DC 20011-8400

August 20, 2021

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 rationale 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 and 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.

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,

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."**

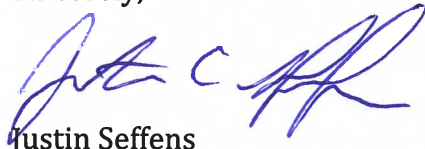
A copy of this memorandum is posted on the AFRH website:

<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

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.

Exhibit 1: Revised Base Plan for Zone A

The following graphic provides a comparison of the parcel configuration of Zone A from the approved AFRH-W Master Plan (base graphic) and the revised parcel configuration to be included in Master Plan Amendment #2 (green overlay). The comparison shows the following revisions:

- Reconfiguration of Parcel M and adjacent streets (see Exhibit 5 for details);
- Realignment of road from Scale Gate to the historic core to focus on the historic Mess Hall;
- Minor reconfiguration of parcels along Irving Street to create a more active street front at the perimeter of the development; and
- Realignment of street (now to be pedestrian only) between Parcels Q and S to create an axial view between Eisenhower Street and the Pasture.



Figure 1.1 Comparison of original parcel configuration and revised parcel configuration.

Exhibit 2: Townhome Guidelines

The existing Master Plan identifies low-rise residential buildings for Parcels T, S, Q, O, and M. Master Plan Amendment #2 contemplates the use of townhomes on one or more of these parcels. Considering their prominent location within Zone A and proximity to the historic hospital complex and pasture, Amendment #2 provides additional guidelines for this type of development at AFRH-W and to supplement the existing design guidelines that are applicable to other product types throughout Zone A. All guidelines are being developed in direct consultation with DC SHPO. The guidelines are presented based on the following organization and with the following design and planning objectives in mind:

Parcel Plan and Build-To Criteria

These guidelines address setbacks, groupings, and orientation to:

- Delineate the historic Pasture and new roadways and their contours;
- Respond to the existing topography;
- Respect view sheds to the historic hospital complex and pasture; and
- Minimize views of rear elevations, alleys, and parking areas.

Height and Massing

These guidelines use height and massing to ensure:

- Preservation of view corridors;
- Respect for site topography;
- Smooth transition between the open Pasture and the more urban development to the west;
- Consistent delineation of the Pasture; and
- Successful visual relationships between groupings of townhomes.

Elevations and Fenestration

These guidelines address fenestration to:

- Achieve a cohesive rhythm along the street edges;
- Allow variation in design while ensuring compatibility and cohesiveness; and
- Prevent blank side elevations.

Materials

These guidelines address appropriate materials considering the scale of the product type and the proximity of some of these parcels to the historic core.

Architectural Features

These guidelines address building entrances, windows, porches/porticos, balconies, terraces, fencing, and appurtenances to:

- Ensure consistency with historic residential forms;
- Provide rhythm within groups and between strings of townhomes;

- Ensure compatibility with the nearby historic resources through scale, proportion, and character;
- Encourage privacy within dwellings;
- Create visual interest at the street level; and
- Remain deferential to the historic core.

Foundations

These guidelines address the material and construction of foundations and roofs to ensure compatibility with the character of the existing historic buildings.

Lofts and Rooftop Decks

These guidelines address visibility of these features to ensure compatibility with and deference to the historic buildings.

Mechanical Equipment

These guidelines address proper screening and placement of mechanical equipment to preserve the character of the historic district and ensure pleasing aesthetics of the development.

Exhibit 3: Built Form Guidelines

All development in Zone A will continue to follow the general guidance provided in the original Master Plan, including an emphasis on horizontal datum, breaking up long façades with setbacks and other forms of architectural articulation, compatibility with the historic district, adherence to fenestration guidelines (i.e., solid/void ratios), and architectural harmony within the development. Additional guidelines are provided to reflect best practices in incorporating green building elements, including green roofs and solar capture, on both existing buildings and new construction.

To further inform individual development proposals, Master Plan Amendment #2 presents revised built form guidelines that allow the general guidance to be applied in a more refined approach without being overly prescriptive. These guidelines provide design objectives and direction based on a categorization of street edges, which reflects visual context and hierarchy of the streets within Zone A. The map below illustrates the street edge categories defined in the amendment.

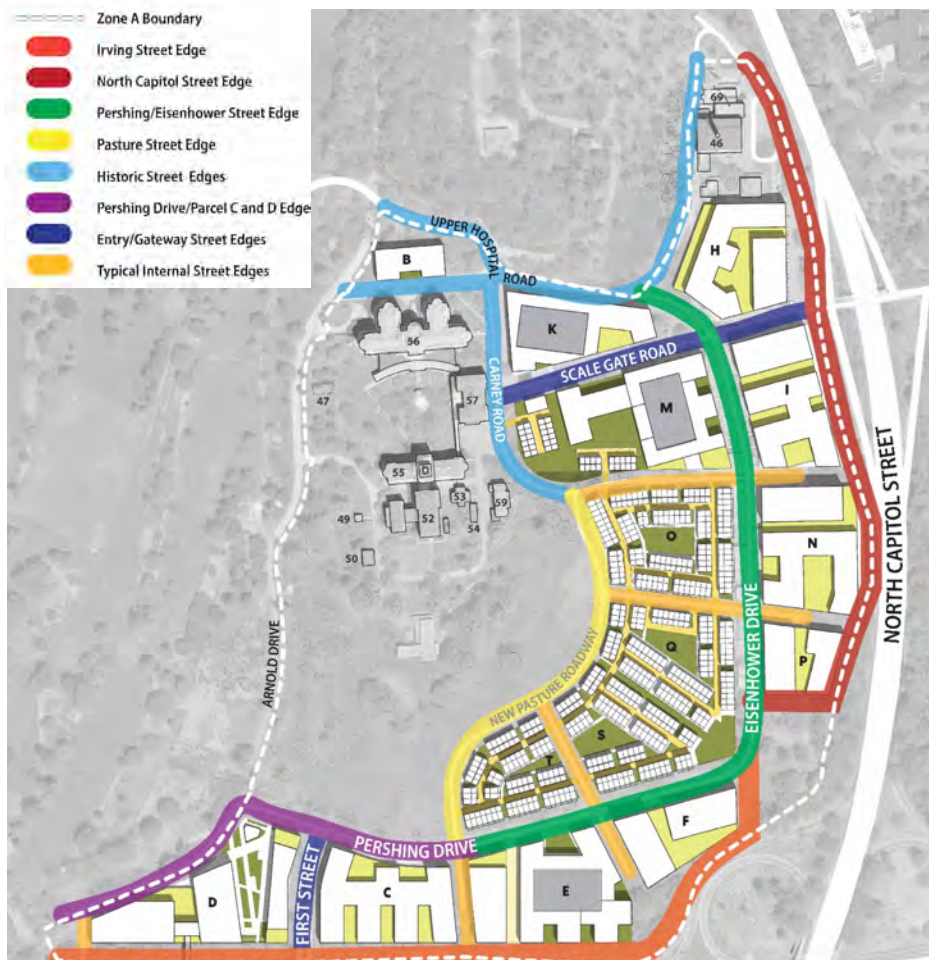


Figure 3.1 Street Edge Map for Zone A

The following summarizes the specific design objectives for each street edge section.

Irving Street Edge

- Provide another public face to the development along Irving Street through the articulation and quality of materials and design on both the internal and external-facing elevations.
- Activate the street front and provide a successful pedestrian experience along Irving Street.
- Prevent service areas and utilitarian building features (i.e., garage entrances, trash, etc.) along Irving Street.

North Capitol Street Edge

- Provide a public face to the development through the articulation and quality of materials and design on both the internal and external-facing elevations.
- Prevent service areas and utilitarian building features (i.e., garage entrances, trash, etc.) along North Capitol Street.

Pershing/Eisenhower Street Edge

- Recognize opportunities for a broader interpretation of compatibility with the historic district due to distance and lack of visibility from the historic core and from the exterior of the site.
- Focus on the architectural harmony and compatibility between both sides of these important corridors.
- Allow for a more urban character to these streets with an emphasis on an active street front and successful pedestrian experience.
- Prevent service areas and utilitarian building features (i.e., garage entrances, trash, etc.) along these primary streets.

Pasture Street Edge

- Delineate and emphasize the historic pasture.
- Guide a greater level of compatibility with the historic hospital complex.
- Prevent utilitarian building features (i.e., garage entrances, trash, etc.) along the pasture.

Historic Street Edges

- Guide a greater level of compatibility with and deference to the adjacent historic buildings and landscapes.
- Provide a transition from the historic core to the larger, more urban character of the development to the south and east.
- Prevent service areas and utilitarian building features (i.e., garage entrances, trash, etc.) along these street edges.

Pershing Drive/Parcel C and D Street Edge

- Focus on more compatibility with the historic district at Parcel C and transition to a broader interpretation of compatibility as you move west to Parcel D to recognize the unique character of this street edge.
- Emphasize the pedestrian experience.
- Define a one-sided street edge and termination of the development area.
- Prevent service areas and utilitarian building features (i.e., garage entrances, trash, etc.) along the pasture.

Entry/Gateway Street Edges

- Establish and reinforce the overall character of both the development and the historic district while allowing a broader interpretation of compatibility with the historic character where appropriate.
- Encourage architectural interest and notable architectural features to welcome all modes of entry into the site.
- Reinforce the pedestrian experience.
- Prevent service areas and utilitarian building features (i.e., garage entrances, trash, etc.) along these street edges.

Typical Internal Street Edges

- Ensure attention to architectural treatment, harmony, and materials while accommodating service areas and utilitarian building features.

Exhibit 4: "Planning for the Future"

The following graphic is revised to show an updated plan for adapting the eastern perimeter of Zone A to a potential reconfiguration of the cloverleaf interchange at Irving Street and North Capitol Street and to a more urban street section along North Capitol Street.

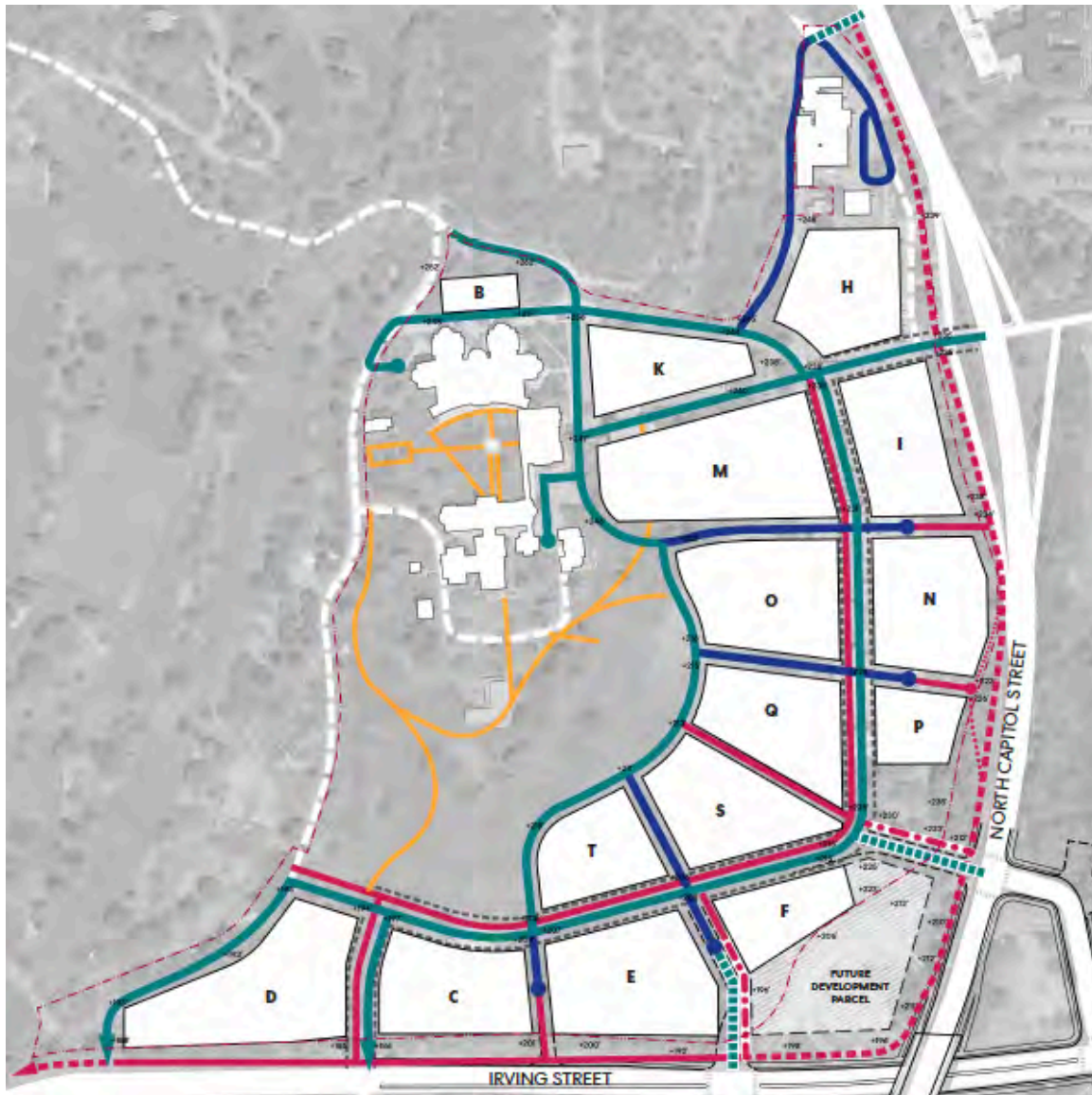


Figure 4.1 Revised future adaptability plan for Zone A

Exhibit 5: Parcel M Reconfiguration

Master Plan Amendment #2 includes a reconfiguration of Parcel M to achieve the following planning objectives:

- Preserve existing mature trees by reusing the alignment of the existing road and reducing grading impacts;
- Create a more continuous and active connection between Scale Gate and the Historic Core;
- Provide a mix of densities, building types, and uses on this parcel; and
- Provide a more defined edge to the northern end of the Pasture.

Although the reconfiguration moves the new development closer to the historic core, location-specific design guidelines ensure that that new buildings are both deferential to and compatible with the historic buildings. These guidelines focus on architectural character, as well as setbacks both at the ground level and at upper levels of development to preserve important axial views to the historic Forwood Building and King Hall.

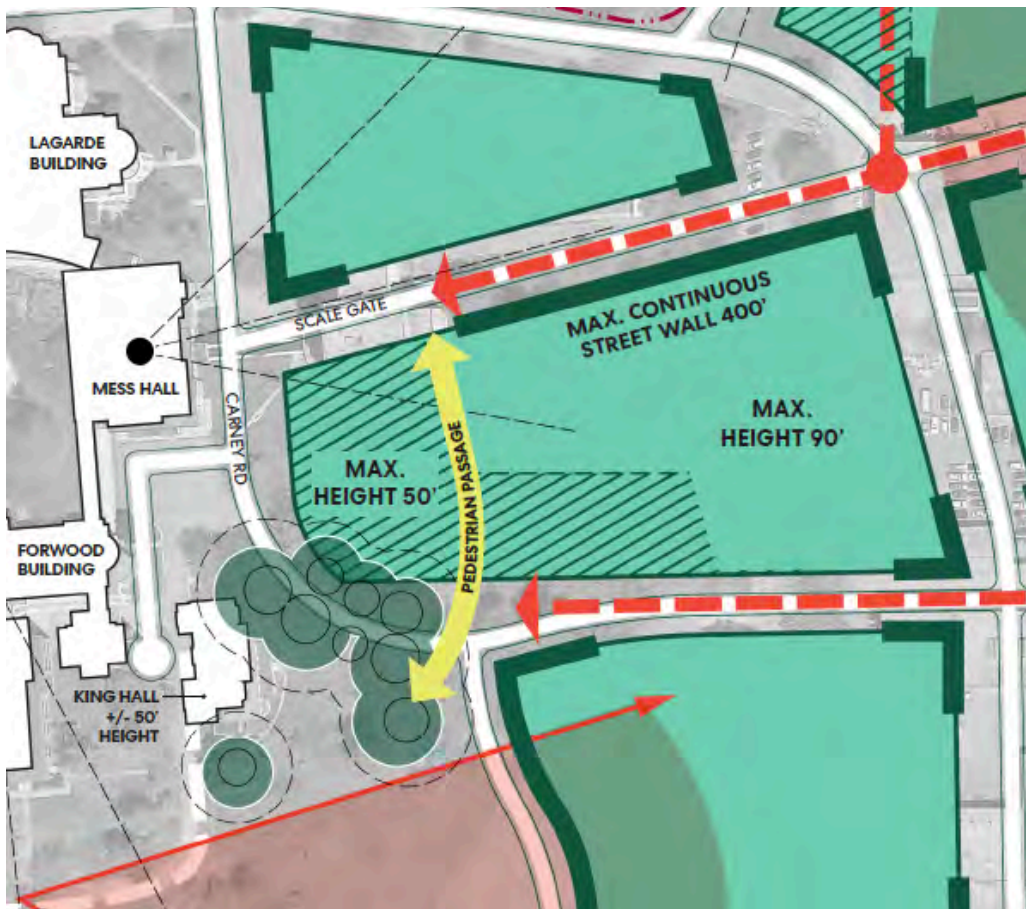


Figure 5.1 Revised configuration of Parcel M.

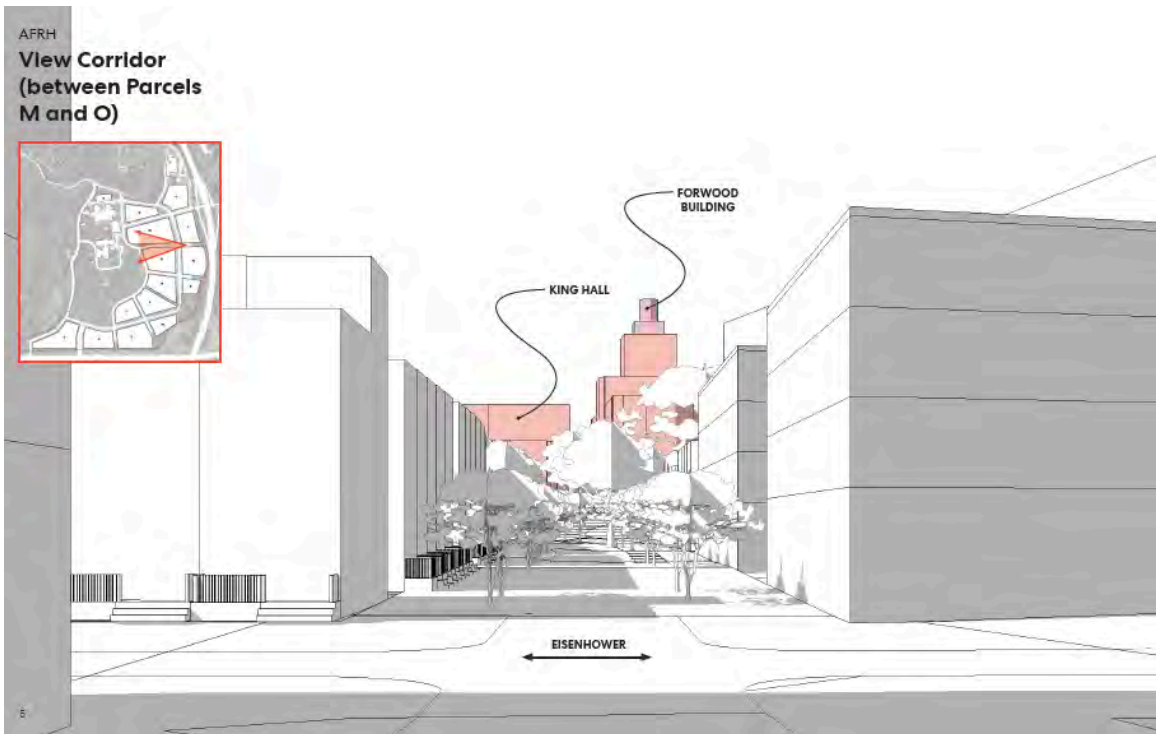


Figure 5.2 Street view looking west from Eisenhower Street toward the Forwood Building.*

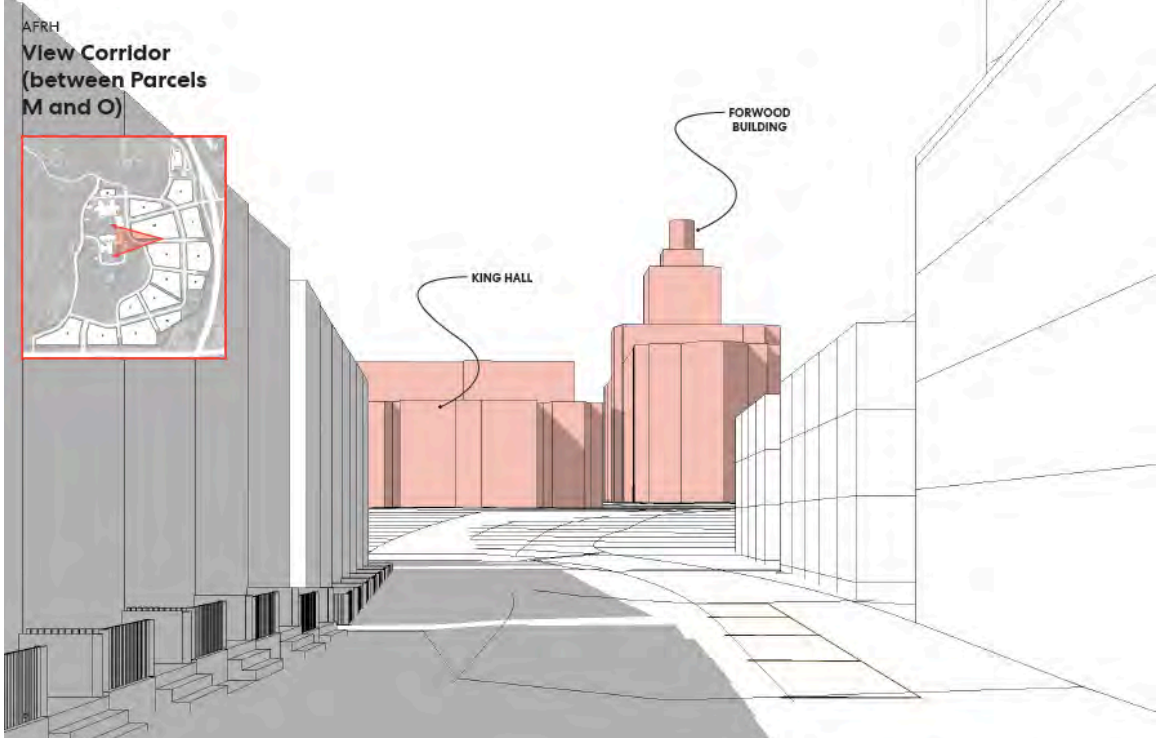


Figure 5.3 Street view looking west toward the Forwood Building from the middle of the block between Parcels M and O.*

*Please note that the massing of new development is provided to illustrate how the design guidelines will preserve views to the historic buildings. These illustrations do not reflect specific proposals for massing or design.

Exhibit 6: Irving Street Activation

The following excerpt from Exhibit 1's graphic highlights the changes along Irving Street to activate this important interface between Zone A and the area to the south. This activation aligns with the city's goals to create a more pedestrian friendly urban environment in this area of the city. Revisions include:

- Reconfiguration of Parcels E and F to widen the street between the two parcels and accommodate a potential reconfiguration of the cloverleaf interchange.
- Removal of the entrance between Parcels C and E, which is close to the westbound off ramp from North Capitol Street and would be dangerous to traverse until the interchange is reconfigured.
- Shift of development parcels D, C, and E to the south to better address and activate Irving Street.



Exhibit 6.1 Detail of changes along Irving Street (excerpt of graphic from Exhibit 1)

Exhibit 7: Archaeology

Master Plan Amendment #2 will provide information on the updated archaeological assessment at AFRH-W, which was completed in 2014 and makes obsolete all previously presented archaeological information in the Master Plan. In compliance with federal law, all specific, location-based information about archaeological potential is removed from the Master Plan and will be replaced by the following guidance:

“Areas with archeological resource potential were identified within the Phase 1A Archeological Assessment completed by AFRH in 2014. The 2014 study supersedes the 2004 study for Zone A. In accordance with the Phase 1A Assessment and Programmatic Agreement, archeological monitoring is recommended during construction and ground disturbing activity in some areas of the development. Archeological requirements will be informed by the 2014 Phase 1A Archeological Assessment in consultation with the DC HPO. “

Exhibit 8: Street Types

Historic Pershing Drive consists of a narrow unpaved road flanked by an alley of trees. The original Master Plan provides a street section for the new Pershing Drive with vehicular lanes that flank the historic resource, making the original road and tree alley a center median of the new road. Maser Plan Amendment #2 includes a revised street section that shifts the historic resource (road and tree alley) to the north side of the new road to create a more pedestrian- and bike-friendly street section. The historic resource now becomes a multi-modal trail and landscape buffer between the new vehicular road and the residential development to the north.

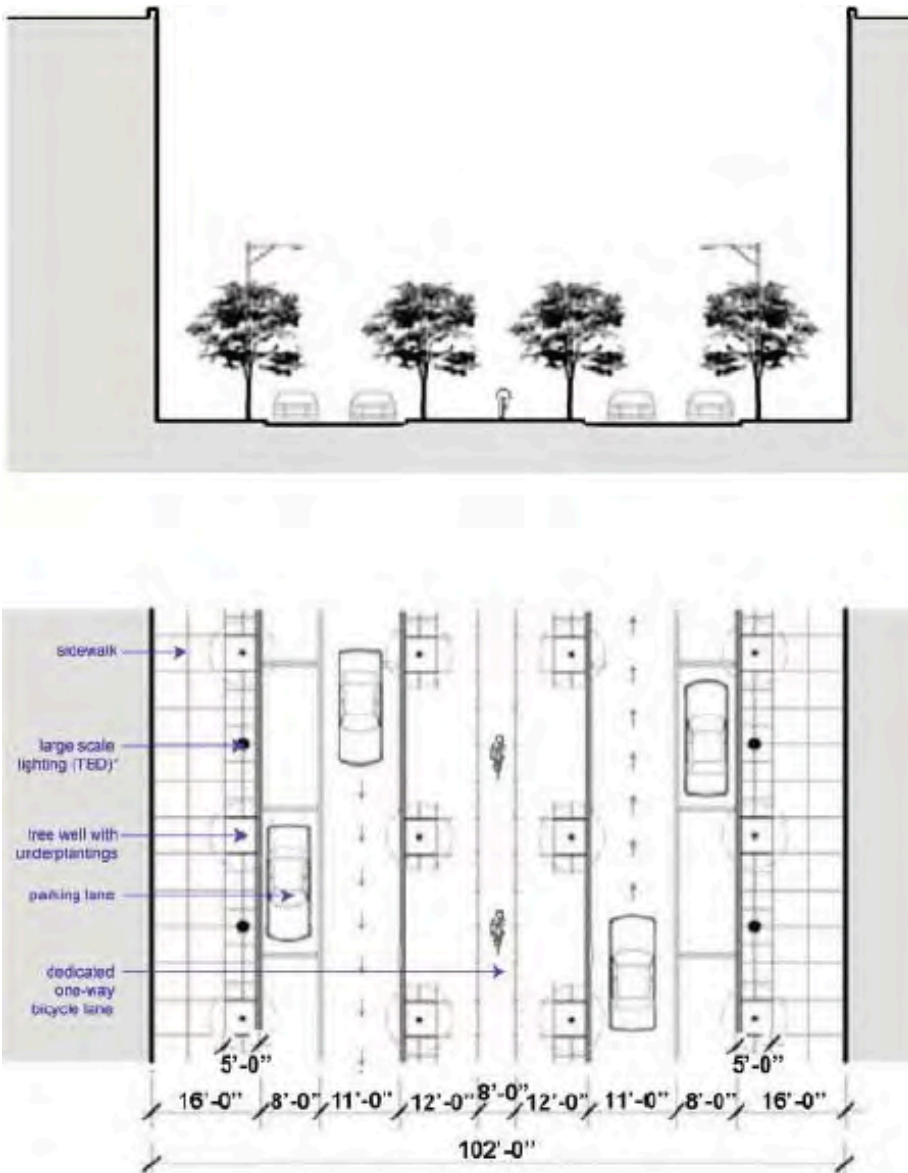


Figure 8.1 Original street section for Pershing Drive as provided in the AFRH-W Master Plan

AFRH
Street Typologies
Type 1C



TYPE 1C RIGHT-OF-WAY DIMENSIONS	
Original Master Plan	102'
DDOT	-
Recommended	91'

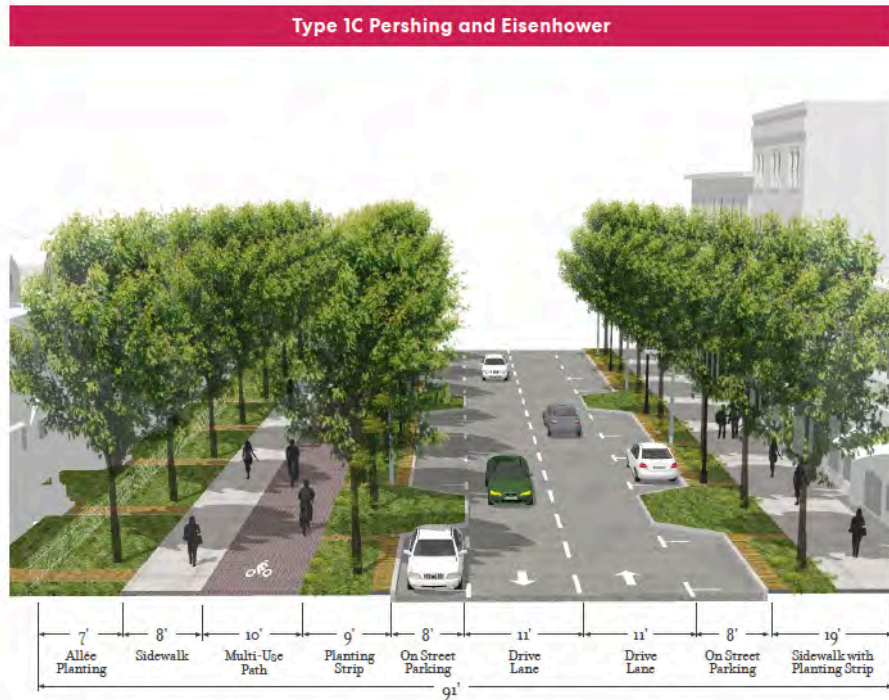


Figure 8.2 Revised street section for Pershing Drive to be included in Master Plan Amendment #2

Exhibit 9: Parking

The original Master Plan specified a combination of aboveground and belowground structured parking. Aboveground parking was accommodated as both wrapped and screened structured parking, and the plan currently provides guidance on the design of screened parking. Master Plan Amendment #2 accommodates a change on select parcels from belowground parking to aboveground 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. An overall reduction in parking is proposed. The Master Plan Amendment also eliminates the prescriptive 45-foot height limit of structured parking to ensure that the height of structured parking is related to the height of the associated building.

Master Plan Amendment #2 will include the following design guidelines for structured parking:

- Fenestration for aboveground structured parking facilities is to blend with the character of the surrounding buildings and not to express their use on the outside of the building. Exposed ramps are not permissible, the solid-to-void ratios are to follow the qualification provided for the whole site, and fenestration dimensions are to link the building bases with upper levels of program.
- The maximum height of structured parking must be at least one level below the height of the associated building.

Exhibit 10: Density and Land Use

The following table compares the program from the approved Master Plan (as amended in 2018) and the revised program to be included in Master Plan Amendment #2.

AFRH

Program Size Comparison

	2018 Approved Master Plan	2021 Proposed Optimized Master Plan	Delta to 2018 Approved Master Plan
Residential	2,280,477	3,176,916	896,439
<i>Units</i>		3,112	3,112
Commercial	1,191,391	732,846	(458,545)
Medical	290,650	319,077	28,427
<i>Office Subtotal</i>	1,482,041	1,051,923	(430,118)
Retail	214,086	206,028	(8,058)
Asst . Living	214,000	309,678	95,678
Hotel	126,391	116,000	(10,391)
Heating Plant Area	36,088	36,088	-
TOTAL	4,353,083	4,896,633	543,550

**Note: Per the master plan, this is net of above-grade structured parking*

Exhibit 11: Assessment of Effects

Pursuant to 36 CFR 800.4(d), the following matrix presents an assessment of potential effects on historic resources of the nine areas of change that are covered by Master Plan Amendment #2. Where potential adverse effects are anticipated, the matrix describes the resolution proposed by AFRH. All resolutions are incorporated into Master Plan Amendment #2 accordingly.

Proposed Area of Change	Discussion	Resolution
Townhome Guidelines (see Exhibit 2)	The existing design guidelines are focused on multi-family buildings and do not address the unique aspects of this building type in Zone A.	Design guidelines specific to Townhomes address building materials, street rhythm and building proportions, design and use of penthouses, views of side and rear elevations, and siting of utilitarian functions and parking.
Built Form Guidelines (see Exhibit 3)	The existing design guidelines are overly prescriptive and yet vague in how and where they should be applied.	Revised design guidelines have been developed with input from HPO to provide clarity and to better inform development based on location and context within Zone A. HPO will continue to consult with AFRH to refine the details of the guidelines.
“Planning for the Future” (see Exhibit 4)	The reconfiguration of the cloverleaf interchange is not yet planned. The purpose of this section is to acknowledge that it may occur and to show how the plan for Zone A could be adapted to such a reconfiguration. Specific plans and designs for such adaptation will be developed and reviewed once the reconfiguration of the interchange is proposed by the city.	n/a

Proposed Area of Change	Discussion	Resolution
Parcel M Reconfiguration (see Exhibit 5)	The reconfiguration of Parcel M changes the focus of the identified view from the Forwood building to the Mess Hall and preserves additional mature trees to the south. New development is moved closer to the historic buildings.	Any potential effects of the reconfiguration are minimized by the addition of height limitations, setbacks, and specific design guidance to ensure new development is deferential to historic buildings and that identified view corridors to the historic hospital complex are preserved.
Irving Street Activation (see Exhibit 6)	The reconfiguration of parcels along Irving Street does not have a potential effect on historic resources, significant view corridors, or the character of the historic district.	n/a
Archaeology (see Exhibit 7)	These changes are limited to the presentation of information regarding archaeological potential, which has been reviewed by the city archaeologist. No changes are proposed to the treatment of archaeology on the site.	All development will continue to follow the PA with respect to required investigations and consultation related to archaeology.
Street Types (see Exhibit 8)	Any new street sections or adjustments to street configuration avoid encroachment on protected landscapes and allow additional mature trees to be retained.	n/a

Proposed Area of Change	Discussion	Resolution
Parking (see Exhibit 9)	The existing Maser Plan includes both wrapped and screened aboveground structured parking. The amendment allows for some of the belowground parking to be accommodated aboveground. Wrapped parking will not be visible from the exterior of buildings.	The Master Plan continues to encourage aboveground structured parking be wrapped with programmed use. In the case that parking is not wrapped, design guidelines address screening parking from view. The amendment provides additional guidance based on improved methods for screening aboveground parking.
Density and Land Use (see Exhibit 10)	The increased density and adjustments to the distribution of potential uses in the proposed development program will not have an adverse effect on the historic district. No changes are proposed to the maximum height limits on each parcel, and no views are affected. No changes are proposed to the amount of open space provided or to the preservation and adaptive reuse of historic resources (built and landscape). Note that the change in uses results in lower traffic counts and levels of parking.	n/a