

# U.S. Armed Forces Retirement Home Record of Decision

## Armed Forces Retirement Home – Washington Master Plan Update Washington, DC

This Record of Decision (ROD) is prepared in accordance with the Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act (NEPA) at Title 40 Code of Federal Regulations (CFR) Part 1505.2, Record of Decisions in Cases Requiring Environmental Impact Statements; and Armed Forces Retirement Home (AFRH) implementing NEPA regulations at 38 CFR 200, Environmental Considerations in Decision-making. Specifically, this ROD:

1. States AFRH's decision;
2. Identifies all alternatives considered by AFRH in reaching the decision and specifies the environmentally preferable alternative;
3. Identifies and discusses relevant factors (e.g., operational, environmental, economic, and technical) that were considered in making the decision among the alternatives and states how those conditions entered into this decision; and
4. States the mitigation adopted, determines whether all practicable means to avoid or minimize environmental harm from the selected alternative have been adopted, and summarizes the applicable monitoring and enforcement program adopted for the applicable mitigation.

### **1 Decision**

As Chief Operating Officer (COO) of the AFRH, it is my decision to:

- Implement Alternative 3: Master Plan Amendment 2 (hereafter referred to as the Selected Alternative) to sustain AFRH and its primary source of funding, the AFRH Trust Fund.

This ROD documents the specific components of my decision and the rationale for my decision. This decision is based on analyses contained in the Final Environmental Impact Statement (FEIS) issued in 2007; the Draft Supplemental Environmental Impact Statement (SEIS) issued in November 2017; the Final SEIS issued on March 25, 2022; the comments of Federal and District of Columbia agencies, members of the public, and elected officials; and other information in the administrative record.

---

## 2 Rationale for the Decision

The decision to implement the Selected Alternative involved balancing resource concerns and public interests. I reached my decision after careful consideration of the environmental analysis of the effects of the action alternative and the no action alternative in concert with AFRH's needs.

The Selected Alternative includes key measures to avoid and minimize impacts including:

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

## 3 Background Information

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

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

- demolition and replacement of the previous Scott Building in the AFRH Zone;
- a \$15 million restoration and expansion of the Lincoln’s Cottage historic site;
- closure and anticipated reuse of the Heating Plant and inclusion of the Plant in the development area;
- elimination of development in Zones B and C (which were analyzed in the 2007 FEIS but not included in the 2008 Master Plan); and
- the anticipated development of the McMillan Reservoir parcel immediately south of AFRH-W along with other area development.

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

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

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

## **4 Purpose of and Need for Action**

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

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

In 1991, Congress merged the United States Soldiers’ and Airmen’s Home (USSAH), financed via a Trust Fund established in 1851 with funds provided by Congress after the Mexican-American War, and the United States Naval Home, historically funded by Navy appropriations, into a new and independent executive branch agency (i.e., AFRH). In merging them, Congress stipulated that the USSAH’s Trust Fund will become the single, primary, and self-sustaining funding source for both Homes *and* a new headquarters organization. It also changed the operating model, directing the new AFRH to provide healthcare, services, and accommodations much as the private sector offers at continuing care retirement communities (CCRC), rather than serve as a transient asylum for indigent retired enlisted personnel. As a result, today’s AFRH is the federal

government's *only* accredited and certified CCRC offering a continuum of five levels of care to eligible residents: independent living, independent living plus, assisted living, long term care, and memory support. This merger, without fundamentally changing the financing model in law, placed significant burden on the now-AFRH Trust Fund: to this day, AFRH is financially constrained in performing its broad, valued, and unique mission.

In accordance with Title 24, chapter 10, the AFRH Trust Fund is capitalized through resident fees; military fines and forfeitures; fifty-cent monthly deductions from active duty enlisted military personnel pay (or an equivalent fee upon admission for eligible reserve component personnel); interest on the Trust Fund; and investments in U.S. Treasury bills. Fees are fixed as a percentage (currently 47%) of the resident's total monthly income and monthly receipts. Additionally, the fees are subject to a limitation on maximum monthly amounts that are based on cost by level of care but that are still below actual cost. Less than 30% of residents actually pay the maximum amount because of these caps and all residents are subsidized to some extent. Fines and forfeitures, formerly the largest fund source at \$40M-\$50M annually, have decreased by half since 2009 (for various reasons).

These long-standing income sources have proven insufficient to fund operations and improvements. As contributions to the Trust Fund have fallen over the last 14 years, operations and maintenance and capital requirements, in comparison, have risen sharply due to the rising costs of healthcare, inflation, and deferred maintenance. Even its investments have been affected, as interest rates have considerably declined due to economic conditions (most recently surrounding the Coronavirus pandemic).

In FY 2009, AFRH total revenue receipts equaled \$62.4M. By FY 2016, AFRH total revenue receipts had decreased to \$47.5M, a 24% reduction since 2009.

To ameliorate its financial situation, AFRH has implemented several management initiatives:

- reduced its federal workforce by two-thirds;
- mothballed or leased vacant or underutilized buildings;
- consolidated operations;
- aligned its campuses under a single business model to increase efficiency;
- outsourced administrative roles and responsibilities to federal shared service providers; and
- secured performance-based contracts for transportation, trash removal, custodial services, facility maintenance, grounds maintenance, security, and dining services.

While these initiatives have helped, they alone cannot cover the current gap between mandatory expenses and AFRH's current revenue streams.

Over the years, Congress has recognized AFRH's (and USSAH's) revenue challenges. In 1976, it authorized the USSAH to begin collecting resident fees to be placed in the Trust Fund to address operation and maintenance funding shortfalls. Seeing that fines and forfeitures were not

returning to pre-2009 levels, Congress began in 2016 to appropriate \$20M-\$25M annually from the General Fund to fill the funding gap and support operations. It also directed AFRH and the Department of Defense, which has administrative oversight of the Home, to improve the Trust Fund's solvency by identifying new revenue sources, soliciting donations, and maximizing existing revenue sources. After providing a special appropriation of \$80 million enabling AFRH to construct its new Scott Building, which opened in 2014, Congress appropriated only \$1 million annually for capital construction and renovation between FY 2015 and FY 2019. The balance sheet acquisition value of AFRH's property, plant, and equipment was \$398 million at the end of FY 2020 (minus \$104 million accumulated amortization/depreciation including a \$10 million charge in FY 2020). These minimal capital infusions equated to a capital expenditure ratio of only 0.25% and \$889 per available unit, as opposed to the nationwide average per unit capital expenditure of \$8,465 for private-sector CCRCs. Between FY 2020 and FY 2022, Congress began course correcting, appropriating a total \$28.3 million from the Trust Fund. This influx helped AFRH begin to address its backlog, although the pandemic critically affected AFRH's ability to execute.

AFRH's outdated and deteriorating facilities have a negative effect on its ability to attract and retain residents, and low occupancy exacerbates AFRH's financial problems by reducing fee income and driving higher fixed costs per resident. AFRH faces more than \$50 million in near-term deferred maintenance and required capital improvement projects (at both AFRH-W and AFRH-Gulfport); \$80 million in major renovations at AFRH-W to meet the evolving needs of current and future generations of residents, who are living longer, with chronic medical conditions, and who will have special housing and medical needs as they age; and approximately \$500 million to execute the strategic building plan as envisioned in the Master Plan.

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

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

---

## **5 Alternatives Considered**

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

### **5.1 Alternatives Studied in Detail for the Final SEIS**

#### **Alternative 1 - No Action Alternative**

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

Under this Alternative, the opportunities to raise revenue for AFRH would be limited to the reuse of existing buildings, including the Grant Building, and the King Hospital Complex. A total of approximately 538 parking spaces would be created to serve these buildings.

#### **Alternative 2 – Master Plan Amendment 1**

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

Development in Zone A would be undertaken by a private developer to generate income for the AFRH Trust Fund. Zone A is designated for residential, office/research and development, retail, hotel, and medical uses. This alternative was memorialized in the AFRH-W Master Plan Amendment 1.

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

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

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

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

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

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

### Alternative 3 – Master Plan Amendment 2

Alternative 3: Master Plan Amendment 2 includes development in the AFRH Zone and Zone A, and includes the development proposed by AFRH Partners for Zone A. The alternative does not include changes to the development plan or design guidelines for the AFRH Zone, and all substantive changes are limited to Zone A. The alternative accommodates minor changes to the parcel plan in Zone A, responds to changes in local planning strategies and priorities since 2018, and reflects a more objective-based and context-specific approach to design guidelines for new development in Zone A. The alternative also accommodates a small increase in density in Zone A, as well as more flexibility in use and product type while maintaining all previously approved guidelines related to height and viewshed protection. Development in Zone A, as proposed by AFRH Partners, provides 4.9 million gsf of mixed-use development consisting of residential, hospitality, office, and retail uses to generate income for the AFRH Trust Fund.

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

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

LAND USE	Height (# of Feet)	Gross Square Footage	Parking Spaces
<b>EXISTING &amp; TO REMAIN</b>		<b>1,320,615</b>	
Institutional		1,320,615	
<b>AFRH Zone</b>		<b>398,000</b>	
North-Northeast (Institutional)	55-85	350,000	<b>700</b>
Chapel Woods (Residential)	36	42,000	<b>42</b>
Golf Course		6,000	
<b>Zone A (Development Zone)</b>	<b>45-120</b>	<b>4,906,075 *</b>	<b>4,844</b>
Residential		3,175,177	
Commercial		732,846	
Medical		319,077	
Retail		253,297	
Asst. Living		309,678	
Hotel		116,000	
<b>TOTAL NEW DEVELOPMENT</b>		<b>5,304,075**</b>	<b>5586</b>
<b>AFRH GRAND TOTAL</b>		<b>6,624,690</b>	

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

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

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

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

## 5.2 Other Alternatives Considered but Dismissed from Further Study

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

### *Seek Congressional Appropriations*

Prior to the 2007 FEIS, AFRH had never had direct Congressional appropriations and had been directed by Congress and the DoD to manage its Trust Fund and operate on a self-sustaining basis. It is highly unlikely that AFRH would become a fully taxpayer-financed agency, especially given the magnitude of funding required for its capital program, existing budget deficits, and current military spending priorities. AFRH has in the past sought legislation that would



incrementally increase returns on its Trust Fund by allowing AFRH to invest in vehicles other than Treasury bills, as it is currently limited to, but no legislation of this type has been passed; even if it were, returns would not likely be sufficient to meet AFRH's immediate capital requirements. For these reasons, AFRH's need is best met by land development alternatives guided by a Master Plan. Therefore, this alternative was dismissed from further consideration.

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

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

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

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

*Extend Soldiers' Home Cemetery*

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

Additionally, in the 2007 Final EIS, AFRH considered a variety of alternatives to developing AFRH-W to determine feasibility and alignment with the project's purpose, need, and objectives. These alternatives (Alternatives 2, 3A, 3B, 3C, and 4) were based on varying density development build-outs within four development zones – Zones A, B, and C and the AFRH Zone, as shown in Table 3 below (with exception of Alternative 3A, which was selected for the 2007 ROD and is Alternative 2 in this ROD).

**Table 3: Development Alternatives Considered but Dismissed in 2007 FEIS**

Type of Development	Alternative 2 GSF	Alternative 3B GSF	Alternative 3C GSF	Alternative 4 GSF
Institutional	2,550,000	392,000	392,000	350,000
Residential	992,000	4,781,819	4,189,331	4,967,000
Hotel / Conference Center	200,000	220,000	200,000	0
Office / R&D	3,200,000	692,000	1,688,600	700,000
Retail	130,000	241,735	470,763	300,000
Medical	1,600,000	250,000	0	0
<b>TOTAL</b>	<b>8,672,000</b>	<b>6,577,554</b>	<b>6,940,694</b>	<b>6,317,000</b>

Alternatives 2, 3B, 3C, and 4, though studied in detail in 2007, did not provide the best solution to meet AFRH's mission and needs. These alternatives were dismissed from further consideration and are described below.

#### *2007 Final EIS Alternative 2*

The program and density were derived from private sector concepts to redevelop portions of the site for medical and research and development purposes, given the site's proximity to the medical area to the south and planned expansions on the part of some of those hospitals.

Under this alternative:

- The AFRH Zone would be designated for institutional uses and new residential units compatible with AFRH-W operations. There would be moderate in-fill development within these Zones.
- Zone A and B would be designated for educational uses and medical uses compatible with the Washington Hospital Center development south of Irving Street.
- Zone C would contain residential development compatible with the residential development west of Rock Creek Church Road. This zone would also potentially include retail development to serve the residential areas.

#### *2007 Final EIS Alternatives 3B and 3C*

Alternatives 3B and 3C, as studied in the 2007 Final EIS, provided options for development of the individual zones on AFRH-W. In these alternatives, Zone A represents development proposals received in response to the August 2006 Request for Proposals.

Under these alternatives:

- The AFRH Zone would be designated for institutional uses and new residential units compatible with AFRH-W operations. There would be moderate in-fill development within this zone. In addition, several holes on the golf course would be relocated. All alterations to the golf course would occur within the footprint of the current golf course.
- Zone A would be designated for residential, office/research and development, retail, hotel, and medical uses.
- Zones B and C would be designated for residential development which will take place at a later time.

#### *2007 Final EIS Alternative 4*

This alternative was proposed to examine a primarily residential program, without a substantial component for medical or research and development related uses.

Under this alternative:

- The AFRH Zone would be designated for institutional uses and new residential units compatible with AFRH-W operations. There will be moderate in-fill development within this Zone.
  - Zones A and B would be developed with residential, office, and retail uses.
  - Zone C would contain residential development.
- 

## **6 Public Involvement**

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

### **6.1 Draft SEIS Public Comment Period and Public Hearing**

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

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

### **6.2 Final SEIS, 30-Day Public Review**

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

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

### **6.3 Coordination with Agencies, Organizations, and Affected Persons**

Coordination with Federal and local agencies, community groups, and other interested parties was conducted throughout preparation of the SEIS. AFRH has also coordinated with the National Capital Planning Commission, Commission of Fine Arts, District Department of Planning, District Department of Transportation, and the District Historic Preservation Office.

---

## 7 Environmentally Preferable Alternative

The CEQ Regulations § 1505.2 require AFRH to “identify all alternatives considered by the agency in reaching its decision, specifying the alternative or alternatives which were considered to be environmentally preferable.” The environmentally preferable alternative for this action varies depending on the resource area considered. Based on the impact analysis in the Final SEIS, Table 4 shows the environmentally preferable alternative(s) for each of the resources considered.

**Table 4: Environmentally Preferable Alternative(s) by Resource Area**

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

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

---

## 8 Environmental Consequences of the Selected Alternative

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

### Impacts on Stormwater Management

Implementation of the Master Plan will disturb soils from construction on the AFRH-W campus, which will result in temporary, adverse impacts to stormwater quality. The permanent increase in impervious surface from the development of Zone A will result in long-term increases in stormwater runoff.

### Impacts on Greenhouse Gases and Climate Change

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

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

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

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

### **Impacts to Air Quality**

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

### **Impacts on Land Use Planning and Zoning**

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

### **Impacts on Transportation**

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

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

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

### **Impacts on Environmental Contamination**

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

---

## 9 Mitigation Measures Related to the Selected Alternative

### 9.1 Mitigation Measures to be Undertaken

Potential mitigation measures were identified and recommended in the Final SEIS to address the variety of short-term and long-term impacts resulting from the Selected Alternative. With respect to the Selected Alternative, Table 5 details the mitigation commitments that AFRH (for the AFRH Zone) and/or the developer of Zone A will implement. AFRH will provide a periodic report to NCPC on the status of mitigation measures enumerated in this ROD. The report will be provided to NCPC on a biennial basis starting two (2) years after approval of the AFRH Master Plan update.

**Table 5: Mitigation Measures to be Undertaken**

Impact Topic	AFRH	Zone A Developer
<b>Geology, Topography, and Soils</b>	Soil suitability will be determined, and appropriate building foundation specifications will be developed.	
<b>Biological Resources</b>	<p>Mitigation measures for effects to vegetation and wildlife primarily consist of maintaining large green space to provide for wildlife habitat and movement corridors. Landscape and vegetation will be retained in compliance with the approved Master Plan.</p> <p>Revegetation of removed or damaged vegetation, as a result of construction activities, will be undertaken to the extent possible to mitigate impacts to terrestrial biota. Careful siting of new buildings within zones will help mitigate potentially adverse impacts.</p>	
<b>Water Resources</b>	<p>Low-impact development techniques will be implemented, such as bioretention areas, street trees, green roofs on new buildings, rain barrels or cisterns, and pervious sidewalk materials.</p> <p>Large-scale development will be concentrated in Zone A of the AFRH-W campus to preserve and protect 174 acres of existing open space in the AFRH Zone, including the golf course, building quadrangles, woodlands, forests, and other open areas.</p> <p>The vegetative buffer along the perimeter wall of the AFRH Zone will be preserved and enhanced with additional plantings, which will reduce stormwater runoff in these areas. Impacted trees or tree stands will be replaced in form and function to the maximum extent practicable.</p>	

Impact Topic	AFRH	Zone A Developer
	<p>A Stormwater Management Plan (SWMP) and a Soil Erosion and Sediment Control Plan will be prepared for both zones in accordance with the amended 21 DCMR 5 and the 2020 Stormwater Management Guidebook (SWMG). All construction activities including clearing, grading, site stabilization, the preservation or creation of pervious land cover, the construction of drainage conveyance systems, the construction of BMPs, and all other stormwater and sediment related components of the project will be conducted in accordance with the SWMP.</p> <p>Best Management Practices (BMPs) will be utilized to mitigate indirect and cumulative impacts to wetlands associated with the proposed action. Development in wetland areas is regulated by the USACE pursuant to the Clean Water Act. In the District of Columbia, development in wetlands or streams requires a permit from the USACE, Baltimore District issued pursuant to Section 404 (b) (1) guidelines of the Clean Water Act.</p>	
<b>Greenhouse Gases and Climate Change</b>	None	<p>Implementation of an idling reduction program to reduce emissions associated with unnecessary vehicle idling.</p> <p>Implementation of preventative maintenance schedules for construction equipment, to improve the operational efficiency and reduce GHG emissions.</p> <p>Energy conservation measures and/or renewable energy sources could be incorporated into building design to mitigate impacts related to emissions from energy use.</p> <p>Incorporate climate adaptation techniques/systems into the new development. Improved building design, operations, increased green space (such as rooftop gardens or landscaping), and water management can reduce energy use in buildings and can protect them from severe precipitation, flooding and increases in temperature (CCAP 2014).</p>
<b>Air Quality</b>	<p>BMPs outlined in the District’s regulations during construction will be implemented to ensure there will be minimal temporary construction-related adverse impacts. Developers and construction contractors will be required to submit a construction management plan including plans to control impacts to air quality during construction.</p>	
<b>Noise</b>	<p>The following mitigation measures will be developed and enforced through transaction documents between AFRH and developers/construction contractors through a construction management plan:</p>	

Impact Topic	AFRH	Zone A Developer
	<ul style="list-style-type: none"> <li>• All construction equipment powered by an internal combustion engine will be equipped with a properly maintained muffler;</li> <li>• Air compressors will meet current U.S. EPA noise emission standards;</li> <li>• New construction equipment will be used as much as possible since it is generally quieter than older equipment;</li> <li>• Nighttime construction activities will be minimized;</li> <li>• Portable noise barriers within the equipment area and around stationary noise sources will be established; and</li> <li>• Tools and equipment will be selected to minimize noise.</li> </ul>	
<b>Utilities</b>	<p>Impacts to utilities will be minimized through the following:</p> <ul style="list-style-type: none"> <li>• Preparation of a water conservation plan and policy;</li> <li>• Installation of faucet aerators and low-flow toilets and shower heads in new construction;</li> <li>• Design of landscape plans for minimum water use (e.g., plant native, drought-tolerant species);</li> <li>• Minimization of lawns because of their high water consumption (and energy consumption and air emissions from mowers);</li> <li>• When necessary, water conservation in lawn maintenance (set mower blades high and water slowly at night no more than 1 inch per week with automatic, low-volume irrigation equipment);</li> <li>• Incorporation of energy conservation measures into new building design to mitigate impacts related to power systems;</li> <li>• Recycling of construction related debris;</li> <li>• Implementation of office recycling programs in government spaces in accordance with Executive Order 13423, <i>Strengthening Federal Environmental, Energy, and Transportation Management</i>; and</li> <li>• Implementation of office recycling programs in private office and retail spaces in accordance with DC Solid Waste Management and Multi-Material Recycling Act of 1988 (DC Law 7-266).</li> </ul>	



Impact Topic	AFRH	Zone A Developer
<p><b>Transportation</b></p>	<p>AFRH will require developers to prepare a transportation management plan detailing strategies to reduce single occupancy vehicle use.</p>	<p>Developer will provide mitigations as documented in attached Technical Memorandum dated 10 May 2022 (see Appendix A).</p> <p><b>Traffic Mitigation</b></p> <p><u>Irving Street NW and First Street NW</u></p> <ul style="list-style-type: none"> <li>• Extension of First Street NW northward from the Irving Street NW and First Street NW intersection to serve as the gateway access for the site with inbound and outbound access available between Parcel C and Parcel D.</li> <li>• Addition of a northbound-thru lane along First Street NW into the site.</li> <li>• Addition of an eastbound left-turn lane along Irving Street NW into the site.</li> <li>• Signal modification to accommodate site access.</li> <li>• The intersection improvements will be constructed to current DDOT standards.</li> </ul> <p><u>Other Intersection Improvements</u></p> <p>The developer will contribute funding to DDOT for the construction of improvements at the intersections of North Capitol Street and Allison Street NE/Hawaii Avenue NE, and North Capitol Street and Rock Creek Church Road NW/Buchanan Street NE. The improvements the developer will contribute funding toward include the following:</p> <p><u>North Capitol Street and Allison Street NE/Hawaii Avenue NE</u></p> <ul style="list-style-type: none"> <li>• Curb extensions w/ flex posts and white and tan pavement markings at the western and eastern corners of North Capitol Street and Allison Street NW/NE.</li> </ul>

Impact Topic	AFRH	Zone A Developer
		<ul style="list-style-type: none"> <li>• Curb extensions to provide 10-foot clearance between crosswalks and parking zones on Allison Street.</li> </ul> <p><u>North Capitol Street and Rock Creek Church Road NW/Buchanan Street NE:</u></p> <ul style="list-style-type: none"> <li>• Stripe extension of existing painted curb lane buffer to north of Buchanan Street.</li> <li>• Upgrade crosswalk across North Capitol Street to a high visibility crosswalk.</li> </ul> <p>In addition to physical roadway improvements, transportation demand management (TDM) measures will be implemented onsite to reduce single-occupancy vehicle trips. The site developer will work with DDOT to establish a plan that outlines measures that will be applied onsite. These measures will be applied as appropriate for each development phase.</p> <p><u>Additional Access Points</u></p> <p>Upon completion of the urbanization of the cloverleaf and North Capitol Street corridor by DDOT, the developer will provide the following additional access points to the site:</p> <ul style="list-style-type: none"> <li>• One additional connection to North Capitol Street, north of the Heating Plant (Building 46).</li> <li>• One additional connection to North Capitol Street between Parcel F and Parcel P, consistent with the connection shown in the 2021 DDOT North Capitol Cloverleaf Urbanization Study.</li> </ul>

Impact Topic	AFRH	Zone A Developer
		<ul style="list-style-type: none"> <li>One additional connection to Irving Street NW between Parcels E and F, consistent with the connection shown in the 2021 DDOT North Capitol Cloverleaf Urbanization Study.</li> </ul> <p><u>Transit Coordination</u></p> <p>Continue coordination with WMATA and DDOT regarding future transit services, as well as bringing existing and future transit services onto the AFRH-W site.</p> <p>The developer will construct an approximately 800 SF on-site kiosk facility with restrooms and an indoor seating area that will be publicly accessible, as well as three (3) curbside bus parking spaces. The transit center will be located along the Zone A spine road (First Street, Pershing Drive, Eisenhower Drive, or Scale Gate Road). The developer will design and construct the facility based on WMATA design requirements. The developer will work with DDOT and WMATA to locate the facility in the optimal location along the spine road. The permanent location will be constructed at the time that vertical parcel is built. If the parcel selected will not be built out until after Phase 2, the developer will work with DDOT and WMATA to locate a temporary 800SF location with similar amenities that will function until the permanent location is built. At least one (1) Capital Bikeshare station and micromobility parking/charging station described in the Pedestrian and Micromobility Facilities section below will be located near the Transit Center. Electrified shelters will also be included at the main Transit Center and the other bus stops, subject to WMATA and DDOT approval.</p> <p>The Transit Center and bus stops will be designed in coordination with DDOT so that they do not compete with loading zones, pick-up/drop-off zones, or bike lanes.</p>
		<p><b>Pedestrian and Micromobility Facilities</b></p> <p>Bikeshare and micromobility parking as follows:</p> <ul style="list-style-type: none"> <li>Phase 1: One 19-dock Capital Bikeshare station on-site.</li> <li>Phase 2: One 8-bay micromobility parking and charging station.</li> </ul>

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

Impact Topic	AFRH	Zone A Developer
		<p>If DDOT determines it is necessary, the developer, subject to the provisions of the ground lease with AFRH, will provide a public access easement for public access along the side path along the east side of Parcel N. Such easement shall be directly adjacent to the right-of-way and will not extend further than 16 feet from the existing curb of North Capitol* Street.</p> <p>A pedestrian path between Parcel N and Parcel P connecting the Zone A spine road and the North Capitol Street sidewalk will also be designed and built by either the Parcel N or Parcel P Vertical Developer, whichever Parcel is built first. If stairs are necessary to access the sidewalk, it will include a runnel for bicycles.</p>
<b>Environmental Contamination</b>		<p>Should the selected developer opt to remove the asphalt roadway and tar base layer located adjacent to the western side of the Heating Plant (Building 46), this material will be taken off-site to an asphalt recycling facility.</p> <p>The existing groundwater monitoring wells at the site should be abandoned by a licensed driller following DOEE notification and District of Columbia Department of Consumer and Regulatory Affairs (DCRA) permitting. These wells include the five wells installed by ABB Environmental Services, Inc. in 1990 (four of which have been found), the six wells installed by MACTEC in 2006 (most notably dry well W46-1), and the three wells installed by CGS. If the need for any of the wells installed by ABB Environmental Services, Inc. in 1990 continues, it is recommended that new surface covers be installed at these locations.</p> <p>If the out of service underground storage tanks (USTs) at Building 46 are not abandoned in place as expected, soils excavated for the UST removal will need to be transported for off-site disposal.</p> <p>Should the potential need for vapor intrusion mitigation exist, based on the re-development plans for Building 46 (i.e., the first floor of Building 46 will be utilized as occupied space), it is recommended that, in addition to installation and</p>

Impact Topic	AFRH	Zone A Developer
		<p>sampling of new Vapor Monitoring Ports (VMPs) consistent with DOEE's requirement to delineate the extent of impact, existing VMPs (minimally VMP-01 and VMP-06) be re-sampled along with indoor air sampling to confirm the results of CGS' single sampling event before pilot testing/design of a vapor intrusion mitigation system is initiated. If additional VMPs are to be installed, a Work Plan will be developed for DOEE review. DOEE should be consulted to determine whether a DCRA permit will need to be obtained for the mitigation system.</p> <p>In the event that the re-development plans for Building 46 do not include use of the first floor of Building 46 as occupied space or that the results of expanded sampling/re-sampling do not confirm the prior results, conversations will be held with DOEE to discuss its requirements for a mitigation system. Any VMPs, that will no longer be needed, and as approved by DOEE, be abandoned.</p> <p>Additional horizontal delineation of the total petroleum hydrocarbons – diesel range organics (TPH-DRO) contamination in soil should be conducted. In addition to fulfilling DOEE's requirement, this information will be needed if any subsurface excavation is planned in this area (for building footers, etc.) to determine the volume of soil that will require off-site disposal. If a subsurface structure is planned for this area (i.e., sub-grade parking garage or basement), and pending DOEE approval, this information could be obtained while excavation for the structure is being performed. Otherwise, this information should be obtained via soil borings. If this information is to be obtained via soil borings, a Work Plan will be developed for DOEE review, and a DCRA permit should be obtained.</p> <p>Depending on the re-development plans for Building 76 (Garage) and whether soil (that may present a potential vapor intrusion concern) is removed, any planned new residential building(s) in this area may need to be constructed with a vapor barrier to mitigate vapor intrusion.</p> <p>Once DOEE's requirements for this area have been met, a request for closure of LUSTCASE # 2018011 will need to be submitted to DOEE.</p>

Impact Topic	AFRH	Zone A Developer
		<p>Removal of both USTs will be verified by excavation, geophysical methods and/or further records review. After verification of UST removal, a limited contamination assessment will be conducted in the areas of the former USTs to include collection of soil and groundwater samples for analysis of TPH-DRO.</p> <p>Once the redevelopment plans for this area have been determined, the procedure to permanently close the USTs will be initiated. The closure process includes DOEE notification, DCRA permitting, removal or abandonment by a licensed UST contractor, and follow-up reporting. If the USTs are removed, it is recommended that the soil at SB-10 (7') also be excavated for off-site disposal.</p> <p>Once the UST abandonments (or removals) have been completed, a request for closure of LUSTCASE # 2018010 will need to be submitted to DOEE.</p> <p>All hazardous materials including asbestos-containing materials (ACM) and lead-based paint (LBP) will be properly assessed and remediated prior to demolition of buildings or building renovations.</p>
<b>Archeological Resources</b>	<p>Specific Phase 1 archaeological assessments and surveys, as required by the Guidelines for Archaeological Investigations in the District of Columbia and recommended by the AFRH-W Phase 1A archaeological study prepared by Stantec in 2014, will be conducted in defined areas of Limits of Disturbance (LODs) associated with the development locations shown in the Master Plan prior to undertaking related ground disturbance. The assessments and surveys will cover the LODs for all infrastructure, utilities, buildings, and structures. These investigations should be conducted well in advance of the ground disturbance to avoid conflict with development schedules.</p>	
<b>Historic Properties</b>	<ol style="list-style-type: none"> <li>1) AFRH will retain the services of a Cultural Resources Manager (CR Manager) to assist AFRH in the implementation of the 2007 Historic Preservation Plan (HPP). The CR Manager will be retained within twelve (12) months of NCPC's approval of the AFRH-W MP. (Completed 2008 and ongoing)</li> <li>2) AFRH will plant additional trees to replace those required for the relocation of two golf holes due to the Zone A development. Trees will be replaced on a 1-to-1 basis in accordance with AFRH Treatment Recommendations for Landscape Resources in Chapter 6 of the 2007 HPP at the time the golf holes are</li> </ol>	<ol style="list-style-type: none"> <li>1) Developer will rehabilitate and adaptively use, in conformance with the Secretary of Interior's Standards for Rehabilitation (36 C.F.R. 67) and its associated Guidelines the following buildings in Zone A: <ul style="list-style-type: none"> <li>• Barnes Building (Building 52)</li> <li>• Forwood Building (Building 55)</li> <li>• King Hall (Building 59)</li> <li>• Viewing Stand (Building 50)</li> <li>• Bandstand (Building 49)</li> <li>• Mess Hall (Building 57)</li> <li>• Mess Hall Corridor (Building 58)</li> <li>• Hostess House (Building 53)</li> </ul> </li> </ol>

Impact Topic	AFRH	Zone A Developer
	<p>relocated.</p> <p>3) AFRH will develop and implement a Historic Preservation Maintenance Program (HPMP) designed to identify and prioritize the maintenance needs of the contributing historic (built, natural and designed landscape, and archeological) resources. This plan will be developed and implemented within two (2) years of NCP C's approval of the AFRH-W MP. Copies will be provided to Parties and Consulting parties upon written request after its completion. (Completed 2011)</p> <p>4) AFRH will integrate the AFRH-W Resource Inventory/Cultural Resource Management Database into the Home's proposed Computerized Maintenance Management System (CMMS) at the time the new CMMS is brought online. It is anticipated that this system will be brought on line within 2 years of NCP C's approval of the AFRH-W MP. (Completed 2009)</p> <p>5) AFRH will complete an update to an August 2007 tree survey to include Zones B* and C* within one (1) year of commencement of rent payments from the Zone A development (Rent payments will commence with the issuance of the first Certificate of Occupancy for Zone A). Copies will be provided to Parties and Consulting Parties upon written request after its completion.</p> <p>6) AFRH will develop a landscape master plan for the AFRH Zone and Zones B* and C* of the campus. This plan would be developed within one (1) year of the commencement of rent payments from Zone A, and will be based on the AFRH-W MP, HPP, and the updated tree survey identified in #5 above. Implementation of the landscape master plan will begin within one (1) year of completion of the Landscape Master Plan. This document will be distributed to the Parties and Consulting Parties as defined in the AFRH Programmatic Agreement for review and comment during its development.</p>	<ul style="list-style-type: none"> <li>• Quarters 47 (Building 47)</li> <li>• Heating Plant and Storage Contamination Building (Building 46 and 69)</li> </ul> <p>Developer will develop a stabilization and maintenance plan for the buildings and structures listed above no later than 120 days after the effective date of the Master Lease for Zone A detailing the steps to be taken to stabilize and maintain the buildings prior to formal rehabilitation. Rehabilitation for these buildings and structures listed above will commence in accordance with the Project Schedule submitted as part of the Project Plan for the first non-infrastructure phase of development.</p> <p>2) Developer will rehabilitate historic landscape resources in Zone A including:</p> <ul style="list-style-type: none"> <li>• Forwood Building Grounds;</li> <li>• Pershing Drive Street Trees, south and east: Developer will preserve the historic orientation of Pershing Drive and shall preserve, to the maximum extent possible, the alley of trees bordering Pershing Drive. If not possible to save all the trees, the Developer will replant trees of the same species with the intent of restoring the historic alley;</li> <li>• Hospital Complex Quadrangle;</li> <li>• Specimen Trees in Hospital Lawn. If it is not possible to save all trees, the Developer will replant trees of the same species in an AFRH agreed upon location within the Hospital lawn.; and</li> <li>• Pasture Recreation: Developer will preserve to the maximum extent possible the orientation, unaltered topography, and configuration of the Historic Pasture in Zone A. Also, historic trees in the northwest section of the Historic Pasture shall be preserved to the maximum extent possible. If it is not possible to save all trees, the Developer will replant trees of the same species in an AFRH agreed upon location within the historic pasture.</li> </ul> <p>3) The Developer will devise and implement an educational interpretation program, including signage focusing on the history of AFRH and AFRH-W.</p>



Impact Topic	AFRH	Zone A Developer
	<p>7) AFRH will complete specific landscape projects as follows:</p> <ul style="list-style-type: none"> <li>a. The Scott/Sheridan Promenade Project will be completed within three (3) years of NCPC's approval of the AFRH-W MP. (Completed 2008)</li> <li>b. The Scott Building Tree Planting Program will be completed as part of the landscape master plan developed in item #5 above.</li> </ul> <p>8) AFRH will perform a condition assessment of the historic fence along the western perimeter of the site, and will stabilize the fence, which work will be followed by regular, periodic maintenance to prevent further deterioration of the fence. The assessment will be conducted within two (2) years of NCPC's approval of the AFRH-W MP. (Completed 2010)</p> <p>9) AFRH will comply with height limits and screening guidance in the Master Plan to protect viewsheds as identified in the HPP and AFRH-W MP, as approved by NCPC.</p>	<p>4) The Developer will complete a tree-planting program and the maintenance of historic trees in accordance with the approved AFRH Master Plan and Historic Preservation Plan over the course of the Zone A development.</p> <p>5) The Developer will comply with height limits and screening guidance in the Master Plan to protect viewsheds as identified in the HPP and AFRH-W Master Plan, as approved by NCPC.</p>

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

## 10 Unavoidable Adverse Impacts

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

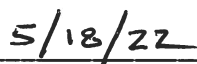
---

## 11 Record of Decision Approval

Based on the analysis and evaluation contained in the Final SEIS, and after careful consideration of all the identified social, economic, and environmental factors; input received from other agencies, organizations, and the public; and the mitigation measures outlined above, it is the decision of AFRH to:

- Implement Alternative 3: Master Plan Amendment 2 to sustain AFRH and its primary source of funding, the AFRH Trust Fund.

  
\_\_\_\_\_  
John S. RisCassi  
Chief Operating Officer  
Armed Forces Retirement Home

  
\_\_\_\_\_  
Date

**Appendix A – Technical Memorandum**

## TECHNICAL MEMORANDUM

To: Anna Chamberlin  
Aaron Zimmerman, PTP  
Jonathan Rogers  
DDOT  
DDOT  
DDOT

Cc: Caroline Kenney  
Chris Vernick  
Jason Spencer  
Gary Ball  
Tim Sheckler  
Adam Catherine, PE, PTOE, ENV SP  
Urban Atlantic  
Urban Atlantic  
Madison Marquette  
Madison Marquette  
US GSA  
Stantec

From: Maribel Wong  
Katie Wagner, PE, PTOE  
Erwin Andres, PE

Date: May 10, 2022

Subject: AFRH-W Zone A Redevelopment – Mitigation Commitments

### Introduction

This memorandum outlines the mitigation measures to be implemented by the AFRH-W Zone A development team as recommended by the District Department of Transportation (DDOT). Mitigation recommendations were received as part of DDOT's review of the Comprehensive Transportation Review (CTR) for the proposed redevelopment of "Zone A" located within the AFRH-W campus into a mixed-use development.

The mitigation measures listed below supersede the mitigation presented in the October 2021 CTR and reflect DDOT's feedback received via email correspondence and in a series of virtual meetings between the project team and DDOT in the Spring of 2022.

A diagram of the phasing plan is included with the Attachments to this memo. The phasing program represents the development team's current strategy to bring the Zone A parcels to completion and is intended to be flexible to adapt to changing market conditions in the future.

### Mitigation Commitments

#### ***Capital Bikeshare Stations and Micro-mobility Corral and Charging Stations***

The developer team will fund and install the following:

- Phase 1:
  - One (1) 19-dock capital bikeshare station on-site
- Phase 2:
  - One (1) 8-bay micro-mobility parking and charging station
- Phase 3:

- One (1) 19-dock capital bikeshare station on-site
- One (1) 8-bay micro-mobility parking and charging station on-site
- Phase 4:
  - One (1) 19-dock capital bikeshare station on-site
  - One (1) 19-dock capital bikeshare station off-site with the location to be coordinated with DDOT.

The measures listed above are to be installed in conjunction with the bulk of the construction associated with their respective phases.

### ***Irving Street and First Street NW Intersection Improvements***

The developer team will design and construct the following:

- The extension of First Street NW northward from the Irving Street and First Street NW intersection to serve as the gateway access for the site with inbound and outbound access available between Parcel D and Parcel C.
- The addition of a northbound-thru lane along First Street NW into the site.
- The addition of an eastbound left-turn lane along Irving Street NW into the site.
- Signal modification to accommodate site access.
- The intersection improvements will be designed to current DDOT standards.
- The developer will design and construct the improvements in full as listed above, subject to DDOT permitting approval. These improvements are to be completed prior to the completion of Phase 1.

### ***AFRH-W Zone A Transit Center***

The development team is excited about bringing bus transit directly into the site and is looking forward to continued coordination to identify implementation mechanics of the transit station. As presented to DDOT, the development team envisions an approximately 800 SF kiosk facility with restrooms and an indoor seating area that will be publicly accessible, as well as three (3) curbside bus parking spaces. The transit center will be located along the Zone A spine road (First Street, Pershing Drive, Eisenhower Drive, or Scale Gate Road).

The developer will design and construct the facility based on WMATA design requirements. The developer will provide a maximum of \$220,000 for the design and construction of the permanent facility and a temporary facility as is needed. The maximum cost cap is based in 2022 dollars. The developer will work with DDOT and WMATA to locate the facility in the optimal location along the spine road. The permanent location will be constructed at the time that vertical parcel is built. If the parcel selected will not be built out until after Phase 2, the developer will work with DDOT and WMATA to locate a temporary 800SF location with similar amenities that will function until the permanent location is built. The budget was determined as follows:

- Design and Build Permanent Location:  $\$150\text{sf} \times 800\text{sf} = \$120\text{k}$
- FF&E: \$20k
- Temporary Transit Station: \$50k
- FF&E for Temporary Transit Station: \$10k
- 10% Contingency: \$20k
- **All in = \$220k**

Rent: WMATA or DDOT shall pay no rent for 20 years from the Certificate of Occupancy date for a transit station in a first-floor retail unit so long as bus service is provided to the site. Should bus transit not serve the site for 60 consecutive days at any point after receipt of the Certificate of Occupancy for a transit station in a first-floor retail unit, the free rent period will end and the occupant will pay the then market rate for retail rent.

At least one (1) Capital Bikeshare station and micromobility parking/charging station described in the Capital Bikeshare Stations and Micro-mobility Corral and Charging Stations section above will be located near the Transit Center. Electrified shelters will also be included at the main Transit Center and the other bus stops, subject to WMATA and DDOT approval.

The Transit Center and bus stops will be designed in coordination with DDOT so that they do not compete with loading zones, pick-up/drop-off zones, or bike lanes.

### ***Tactical Improvements at the N. Capitol Street & Allison Street/Hawaii Avenue intersection and the N. Capitol Street & Rock Creek Church Road/Buchanan Street intersection***

Based on DDOT's feedback the development team has identified the following tactical improvements:

- N. Capitol Street and Allison Street/Hawaii Avenue
  - Curb extensions w/ flex posts and white and tan pavement markings at the western and eastern corners of North Capitol Street and Allison Street NW/NE.
  - Curb extensions to provide 10-foot clearance between crosswalks and parking zones on Allison Street.
- N. Capitol Street and Rock Creek Church Road/Buchanan Street
  - Stripe extension of existing painted curb lane buffer to north of Buchanan Street.
  - Upgrade crosswalk across North Capitol Street to a high visibility crosswalk

Conceptual sketches of these improvements included with the Attachments to this memo. The AFRH-W Zone A developer will contribute \$80,000 to DDOT's Mitigation Fund prior to the completion of Phase 1 for DDOT's use for implementation of the tactical improvements described above.

### ***Irving Street NW Sidepath***

The AFRH-W Zone A developer will design and construct a 10-foot path with 6-foot tree boxes between Park Place NW and the southeastern corner of Parcel E along Irving Street NW. The developer will be responsible for design, permitting, and execution of this work with the completion of Parcel C, D, or E whichever occurs first.

A pedestrian path along the east side of Parcel E between the Zone A spine road and Irving Street NW will also be designed and built by the Parcel E Vertical Developer during the construction of Parcel E.

Figure 1 shows the location of these facilities.

### ***North Capitol Street Sidepath***

The AFRH-W Zone A developer will design and construct a 10-foot path with 6-foot tree boxes between Scale Gate Road and the southeastern corner of Parcel N/northeastern corner of Parcel P along North Capitol Street. The developer will be responsible for design, permitting, and execution of this work with the completion of Parcel P.

If DDOT determines it is necessary, the developer, subject to the provisions of the ground lease with AFRH, will provide a public access easement for public access along the sidepath along the east side of Parcel N. Such easement shall be directly adjacent to the right-of-way and will not extend further than 16 feet from the existing curb of North Capitol Street.

A pedestrian path between Parcel N and Parcel P connecting the Zone A spine road and the North Capitol Street sidewalk will also be designed and built by either the Parcel N or Parcel P Vertical Developer, whichever Parcel is built first. If stairs are necessary to access the sidewalk, it will include a runnel for bicycles.

Figure 1 shows the location of these facilities.



Figure 1: AFRH-W Zone A Frontage Ped/Bike Facilities

## **Attachments:**

**Phasing Diagram**

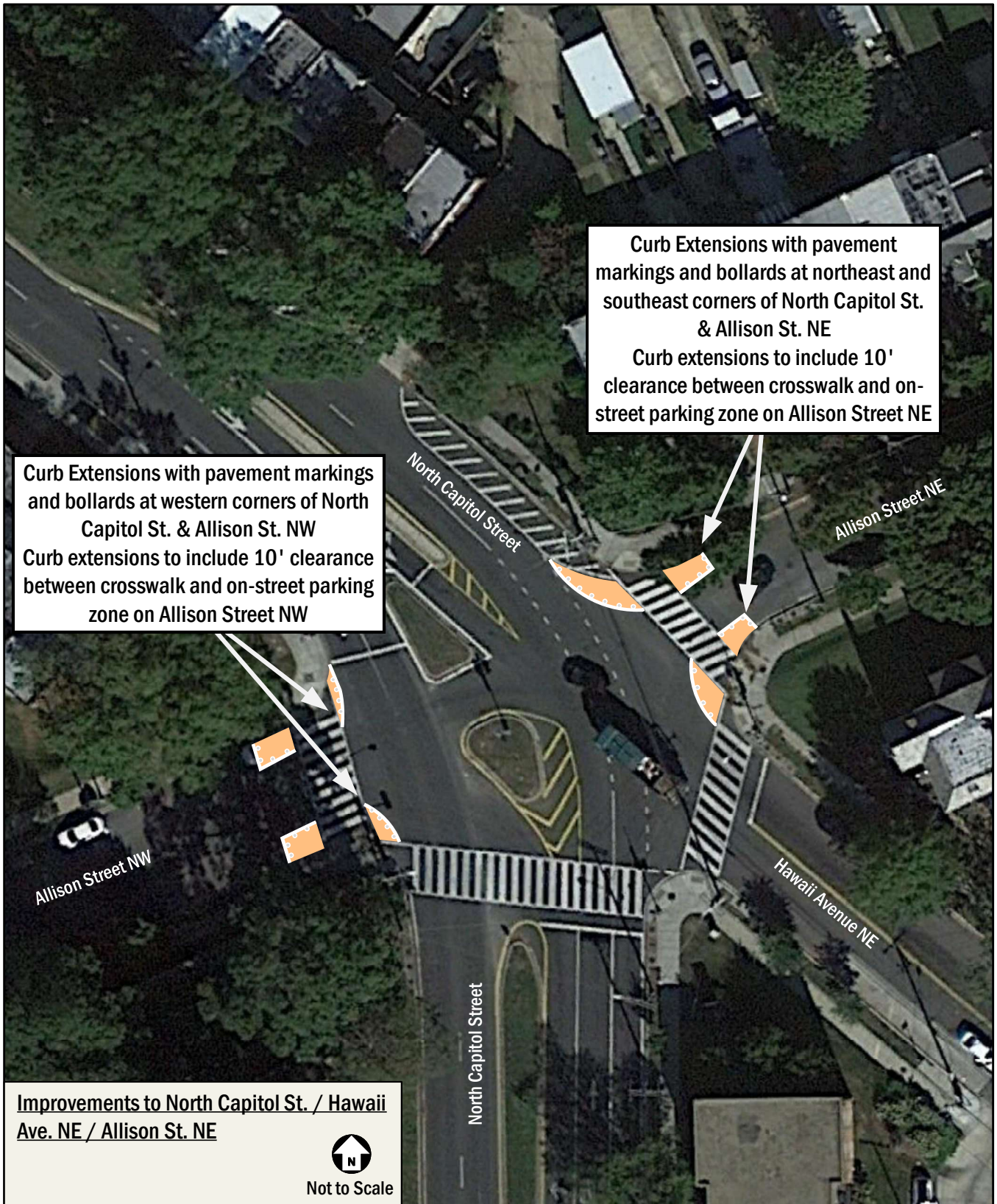
**North Capitol Street Improvements Concept Sketches**



# 121 Phasing Parcels

- LEGEND**
- PHASE 01
  - PHASE 02
  - PHASE 03
  - PHASE 04
  - PASTURE (PHASE 01)





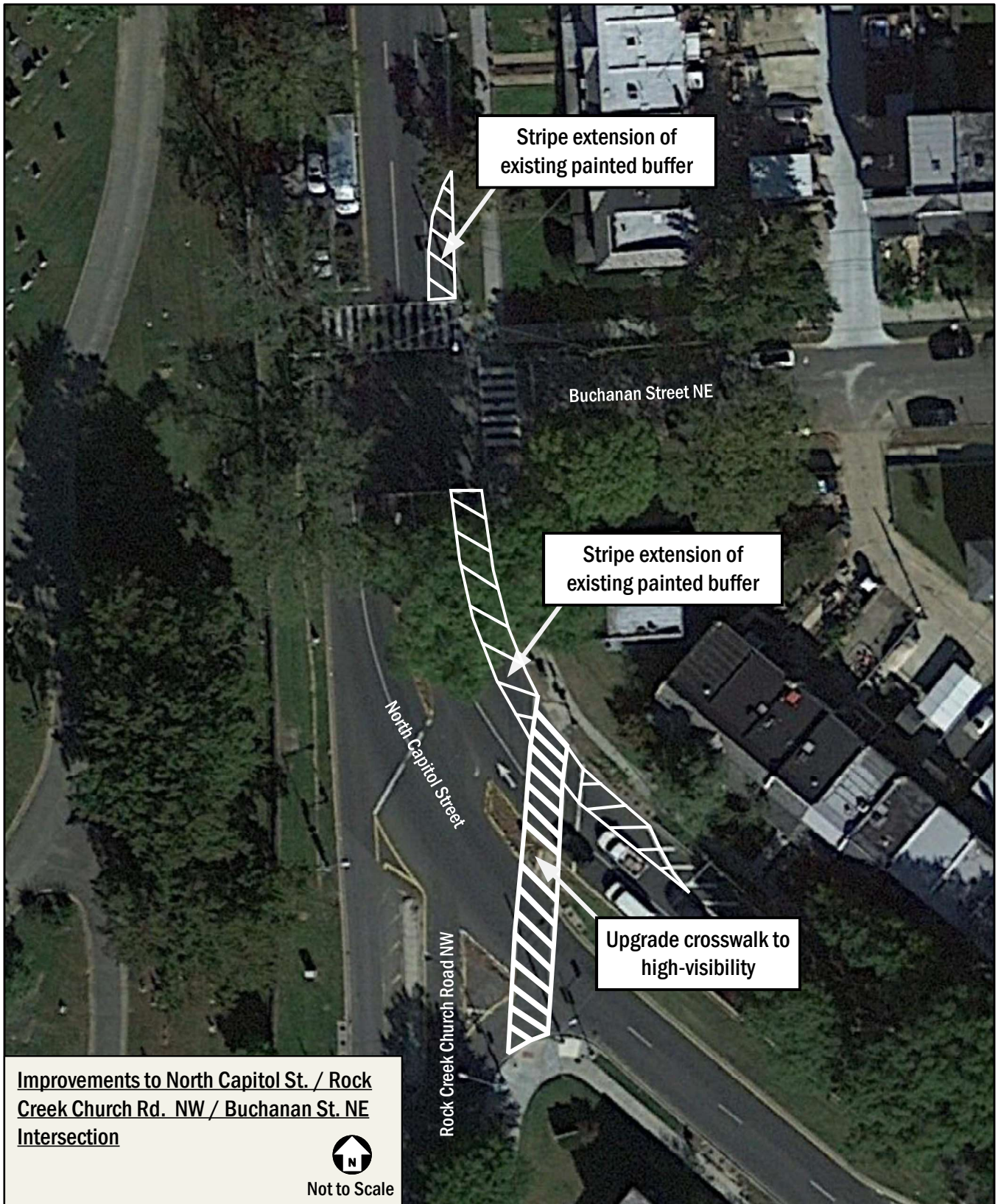
Curb Extensions with pavement markings and bollards at northeast and southeast corners of North Capitol St. & Allison St. NE  
Curb extensions to include 10' clearance between crosswalk and on-street parking zone on Allison Street NE

Curb Extensions with pavement markings and bollards at western corners of North Capitol St. & Allison St. NW  
Curb extensions to include 10' clearance between crosswalk and on-street parking zone on Allison Street NW

Improvements to North Capitol St. / Hawaii Ave. NE / Allison St. NE



Not to Scale



Stripe extension of existing painted buffer

Stripe extension of existing painted buffer

Upgrade crosswalk to high-visibility

**Improvements to North Capitol St. / Rock Creek Church Rd. NW / Buchanan St. NE Intersection**



Not to Scale