DC SHPO
UNDERTAKING REVIEW REQUEST (URR)

URR #34: GOLF HOLE RELOCATION AND BALL FIELD RESTORATION

DATE: 7 August 2014  PROPOSED START DATE: Fall 2014

RESOURCE(S) TO BE AFFECTED:

Character Areas within APE: (not all resources to be affected)
Savannah I (Supporting), Golf Course (Minor), Chapel Woods (Significant)

Individual Resources within APE: (not all resources to be affected)

<table>
<thead>
<tr>
<th>Name</th>
<th>Number</th>
<th>Type</th>
<th>RLS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evergreen Tree Cluster</td>
<td>n/a</td>
<td>Site (landscape)</td>
<td>Significant</td>
</tr>
<tr>
<td>Meadow</td>
<td>n/a</td>
<td>Site (landscape)</td>
<td>Significant</td>
</tr>
<tr>
<td>Ball Field</td>
<td>n/a</td>
<td>Site (landscape)</td>
<td>Non-Contributing</td>
</tr>
<tr>
<td>Chapel Woods West</td>
<td>n/a</td>
<td>Site (landscape)</td>
<td>Significant</td>
</tr>
<tr>
<td>Golf Course</td>
<td>n/a</td>
<td>Site (landscape)</td>
<td>Non-Contributing</td>
</tr>
<tr>
<td>Central Channel</td>
<td>n/a</td>
<td>Structure</td>
<td>Non-Contributing</td>
</tr>
<tr>
<td>Marshall Drive East Culvert</td>
<td>n/a</td>
<td>Structure</td>
<td>Supporting</td>
</tr>
<tr>
<td>Stone Retaining Wall</td>
<td>n/a</td>
<td>Structure</td>
<td>Supporting</td>
</tr>
<tr>
<td>Marshall Drive</td>
<td>n/a</td>
<td>Structure</td>
<td>Significant</td>
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BRIEF DESCRIPTION OF PROPOSED ACTION:

PURPOSE
AFRH proposes to relocate golf holes that will be displaced by the development of Zone A in the south/southeast section of the campus. The golf holes will be relocated to the formal Meadow, which is located in the Savannah I Character Area (as defined in the AFRH-W Historic Preservation Plan). As part of the same effort, AFRH will restore the softball field that was previously located in the Meadow but was temporarily removed when the area was used for contractor staging for construction of the New Scott Building (Building 80) between 2011 and 2013.

GOALS
- Restore recreational activity to the campus core and activate the landscape.
- Maintain the Meadow as a significant open space and landscape resource.
- Maintain golf and softball as important campus activities for residents and staff.
- Maintain the par and rating of the existing AFRH-W Golf Course.
- Improve the condition of the former softball field.
PREVIOUS REVIEWS AND CONSULTATION

2008 Consultation (Master Plan and Programmatic Agreement)
The NCPC-approved AFRH-W Master Plan (MP, 2008) and the associated Programmatic Agreement (PA, 2008) anticipate the relocation of two golf holes of the existing AFRH-W Golf Course. During Section 106 consultation for the MP in 2008, AFRH did not yet have a specific design for the golf hole relocation, and it was unknown at the time whether the action would affect historic landscape resources. As a preemptive action to help move the golf hole relocation forward once a design was developed, AFRH agreed to the following mitigation, which is documented in the PA as:

AFRH will plant additional trees to replace those required for the relocation of two golf holes due to the Zone A redevelopment. Trees will be replaced on a 1-to-1 basis in accordance with AFRH Treatment Recommendations for Landscape Resources in Chapter 6 of the HPP at the time the golf holes are relocation. (AFRH-W PA, Appendix D.A.2, 2008).

AFRH did not move forward with the golf hole relocation immediately because the redevelopment of Zone A did not move forward. Now in 2014, AFRH proposes to move forward with project and to comply with the mitigation action agreed upon in the PA in 2008.

2013 Consultation (URR #1)
AFRH submitted URR #1 to DCSHPO on 10 January 2013, and the URR was approved by DCSHPO on 7 March 2013. URR #1 presented a proposed new location for the golf holes in the Meadow, located directly north of the existing golf course.

Consultation for URR #1 concluded that the relocation of two golf holes to the Meadow is appropriate. Although the proposed relocation site is outside the boundaries of the existing golf course, the URR provides documentation that the Meadow was historically used for golf, as evidenced by historic maps of the campus and other anecdotal documentation. DCSHPO concurred with a finding of No Adverse Effect and stated:

As there is evidence of golf greens within the area of the Meadow during the period 1944-1953, the Meadow has not been maintained intact since its creation in the 1870s or before. In light of that evidence the reuse of a portion of that space appears justifiable as not creating a new adverse effect on the historic landscape. (DCSHPO response to URR #1, March 2013)

URR #1 stated that AFRH would submit a separate request for the design of the golf holes.
## CONDITIONS

A study of the National Register Nomination, as well as historic maps and documentation, provides information regarding the historic use and character of the project area for this undertaking.

In summary:

<table>
<thead>
<tr>
<th>FEATURE</th>
<th>DESCRIPTION</th>
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<tbody>
<tr>
<td>Spatial Organization</td>
<td>The project area has remained undeveloped open space throughout its history.</td>
<td>Figure 8</td>
</tr>
<tr>
<td>Topography</td>
<td>The historic topography is no longer intact and has been impacted by the construction of the Scott Building in the 1950s, along with associated infrastructure improvements and road realignments.</td>
<td>Figures 9, 10, 11</td>
</tr>
<tr>
<td>Use</td>
<td>The project area has historically accommodated active use for agriculture and recreation. The Meadow was used to grow feed for the Home’s livestock through much of the first half of the 20th century. Maps indicate recreational use with established golf greens and pedestrian pathways. The area was also used as an open landscape that affords views across campus (north-south and east-west).</td>
<td>Figures, 12, 15, 16</td>
</tr>
<tr>
<td>Pathways</td>
<td>Brick pathways were historically located along the edge and through the project area. A majority of these pathways have been covered by fill since the 1960s. Some sections of the pathways on the west side of the project area remain visible, and some belowground remnants have been found.</td>
<td>Figure 12</td>
</tr>
<tr>
<td>Chapel Woods</td>
<td>Chapel Woods historically extended west into the project area and bordered a stream bed that ran north-south through the Meadow. The streambed has since been buried, and the area of Chapel Woods west of Arnold Drive has been dramatically decreased since the 1950s.</td>
<td>Figure 13</td>
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<tr>
<td>Other Landscape</td>
<td>The Meadow is an open space bordered and punctuated by individual and clustered trees. According to maps and aerial photographs, the quantity of trees has increased since the period of significance, and the location of trees has changed.</td>
<td>Figure 14</td>
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</tbody>
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CURRENT PROPOSAL

Golf Hole Relocation
The current design proposal for the golf hole relocation is consistent with the general location proposed and approved in URR #1 (Figures 1, 4, 5, 6, 7). AFRH will relocate the golf holes to the Meadow, which is located in the Savannah I Character Area (as defined in the AFRH-W Historic Preservation Plan). The Meadow is a Contributing resource to the AFRH-W Historic District for its role as a picturesque open space that affords views across campus. The Meadow includes other Contributing landscape resources (see Figure 3) such as clusters of evergreen trees. The Meadow is bounded on the east by Chapel Woods West, which is also a Contributing landscape resource in the Chapel Woods Character Area. The work associated with the relocation will extend south into the Golf Course, a Non-Contributing site. Although mostly unimproved, the project area includes both Contributing and Non-Contributing built resources (see Figure 2) such as Marshall Drive (Contributing), the Marshall Drive Culvert (Contributing), the Central Channel (Non-Contributing), and the Retaining Wall (Contributing).

The proposed design for the golf hole relocation includes grading, removal and replacement of select trees and plantings, and the addition of golf hole features including sand bunkers, greens, paths, and a golf cart ramp (Figure 16). Overall, the proposed use and design retains the open space and significant character of the Meadow and avoids or minimizes adverse effects to historic resources.

The plan remains consistent with the mitigation action defined in 2008 for the 1-to-1 replacement of all removed trees. The existing topography is not historic and has changed since the 1940s; the grading for the golf hole relocation will change the topography, but the grading plan maintains the general topography that characterizes Savannah I. The design also maintains the Meadow’s contribution as open space within the historic Spatial Organization of the campus, and views across the meadow will be preserved. Although the Meadow does not include Archeological Sensitivity Zones, as defined in the AFRH-W Historic Preservation Plan (2008), the grading plan avoids impacts to potential remnants of a brick path system that is observed on historic maps of the campus; sections of the brick path system have been uncovered, but the extent and condition of the remnants that are potentially located below grade is unknown.

Ball Field Restoration
AFRH proposes to restore the softball field that was previously located in the northeast corner of the Meadow. The Ball Field is identified as a Non-Contributing resource to the AFRH-W Historic District and dates sometime after the construction of the Scott Building in the early 1950s. Although not historic, the Ball Field is important to the operations of AFRH-W because of its accommodation of recreational activities that are enjoyed by both residents and staff. AFRH temporarily removed the Ball Field to provide a staging area for the construction of the New Scott Building between 2011 and 2013. AFRH is eager to replace the Ball Field and restore softball as a part of resident life on campus. AFRH proposes to place the Ball Field in the same location in the northeast corner of the Meadow and to make minor improvements to its features. The proposed design meets the challenge of combined use of the Meadow for softball and golf by creating dual purposes for some features.
## BREAKDOWN OF PROPOSED ACTION

The following matrix provides a breakdown of the proposed action by feature. The organization of the matrix is as follows:

1. Topography
2. Trees – Evergreen Clusters
3. Trees – Chapel Woods West
4. Trees – Other
5. Views
6. Open Space
7. New Paths
8. Historic Paths
9. Retaining Wall
10. Culvert and Channel
11. New Golf Course Features
12. New/Restored Ball Field Features
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<tr>
<th>Feature</th>
<th>Condition</th>
<th>Action</th>
<th>Reference</th>
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<tr>
<td>Topography</td>
<td>The historic topography of the Meadow is not intact. A comparison of historic maps shows that the topography underwent substantial change during the construction of the Scott Building (Building 80) in the 1950s. At that time, plans show that the Limits of Disturbance for the building project extend over much of Savannah I and the Project Area. Disturbance included infrastructure improvements, the realignment of Arnold Drive through the Meadow, and the likely distribution of cut from the construction effort (evidenced by the recent discovery of buried brick pathways). Also during the 1950s, an open storm water channel (previously a stream bed) was removed and replaced by a buried sewer line that runs north/south through the Meadow. Although the HPP does not mention topography in the description of the Meadow, the HPP’s description of Savannah I states: “This area is characterized by its sloping topography, which rises to a plateau at the statue of General Winfield Scott.” Today, the only exception to the sloping topography is in the northeast corner of the Meadow, which was flattened in the 1950s or 1960s to accommodate the use of the ball field. Since the end of construction of the new Scott Building in 2013, cut from the construction activities has been temporarily leveled on the north side of the meadow until a grading plan for the golf holes is finalized.</td>
<td>The Meadow will be partially graded to accommodate the new golf holes and greens. Changes to the current topography are concentrated around the new greens and new pathways; the overall character of the area, as described in the HPP, will be retained, and the Meadow will continue to be defined “by its sloping topography, which rises to a plateau” at the Scott Statue. The grading plan will also restore the flat area of topography at the northeast corner of the Meadow for use of the ball field. The grading will continue south of Marshall Drive into a small section of the Golf Course. The grading activities will generally avoid the potential locations of below grade remnants of historic brick pathway, as indicated by the 1903, 1914, and 1944 maps of the Home. Cut from the grading activity may be relocated to the South Recreation Field, a Non-Contributing resource that has undergone substantial changes to its topography in the last 60 years.</td>
<td>Figures 9,10,11: Topography Study and Comparison Figures 18-19: Grading plan and details</td>
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<tr>
<td>Feature</td>
<td>Condition</td>
<td>Action</td>
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<td><strong>2. Trees – Evergreen Clusters</strong></td>
<td>The Meadow has several clusters of evergreen trees, which are identified as Contributing landscape resources. The HPP states that these tree clusters first appeared in maps as early as 1873 and “serve as focal points within the expansive grassland, even in winter.” A comparison of historic photographs and historic maps shows that the landscape material of the existing clusters is itself not historic. Most of what is there now is not visible in a 1950s aerial photograph.</td>
<td>The two evergreen tree clusters identified in the HPP will be protected during construction activities by temporary fencing. The two clusters will not be affected.</td>
<td><strong>Figure 3:</strong> Landscape resources  <strong>Figure 14:</strong> Aerial tree comparison  <strong>Figure 21:</strong> Tree cluster protection</td>
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<tr>
<td><strong>3. Trees – Chapel Woods West</strong></td>
<td>The east boundary of the Meadow is defined by the western edge of Chapel Woods West. Chapel Woods West is a Contributing landscape resource characterized by a dense tree canopy and natural undergrowth. Chapel Woods historically extended west across Arnold Drive and bordered a streambed that ran north-south through the Meadow. The substantial infrastructure project to bury the streambed and the realignment of Arnold Drive both caused this area of Chapel Woods (the area located west of Arnold Drive) to decrease in size, particularly along its northern and western boundaries. The tree removal in the 1950s resulted in a western boundary that was farther east than it is today. A 1950s aerial confirms current observations that much of the extant vegetation along the western boundary is relatively new growth that dates after the 1950s.</td>
<td>An area of existing vegetation in Chapel Woods West will be removed, shifting the southwestern boundary of the woods by a minimum of 10 feet and maximum of 40 feet at its widest point. This change allows for a dogleg for the 7th Hole that is long enough to maintain the course rating. All vegetation removal will be limited to the area of woods west of Arnold Drive that has already undergone substantial change since the period of significance. The plans provided show the maximum area of vegetation removal proposed. Total removal may be less. Tree removal will be monitored to ensure that removal is limited to only what is necessary. The remainder of Chapel Woods West will be protected during construction with temporary fencing. Any mature tree removed will be replaced on a 1-1 basis, and replacement trees will be located within the Chapel Woods Character Area and west of Arnold Drive to the extent possible.</td>
<td><strong>Figure 3:</strong> Landscape resources  <strong>Figure 13:</strong> Chapel woods map comparison  <strong>Figure 22:</strong> Chapel woods removal plan  <strong>Figure 23:</strong> Photograph of area of proposed removal</td>
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| 4. Trees - Other | Individual deciduous trees are scattered throughout the Meadow, leaving much of the landscape open and affording views through the center of the campus. These trees are not identified as Contributing landscape features, and most of these tress are not visible in a 1950s aerial photograph of the campus. Some existing trees in the Meadow have been identified by an arborist as not healthy and are marked for removal as part of AFRH’s ongoing tree maintenance on campus. | The plans propose the removal of 13 individual Non-Contributing trees throughout the Meadow and the Golf Course. Two of these trees are dead and have been previously marked for removal. Per the PA, all 13 trees will be replaced on a 1-1 basis. Locations and species of the replacement trees will be based on the guidelines provided in the Master Plan and HPP. | Figure 14: Aerial Tree Comparison  
Figure 27: Tree removal and replacement plan |
<p>| 5. Views         | The HPP does not identify any significant viewsheds across the project area. However, since the HPP was adopted in 2008, conditions regarding the Lincoln Cottage viewshed have changed. The viewshed is shown in the HPP as blocked by the 1950s Scott Building, which has since been demolished and replaced by a building with a smaller footprint. Trees still block the view from Lincoln Cottage to the Meadow. | No aboveground improvements are proposed within identified viewsheds, and the views south from Lincoln Cottage across the Meadow will not be affected. | Figure 29: Protected viewsheds at AFRH-W |
| 6. Open Space    | The Meadow is significant to the Spatial Organization of the campus as a historic open space, never having been occupied by major above-ground improvements. | The plans do not propose any new built resources within the Meadow, retaining the open character of the Meadow, as well as the spatial organization of the campus. | Figure 8: Historic map comparison |</p>
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<th>Condition</th>
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<th>Reference</th>
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| 7. New Paths | n/a       | New pathways will be made to provide pedestrian and golf cart access to the new golf holes form the Golf Course. New pathways have been limited to what is necessary for access only, using existing sidewalks and pathways to the extent possible. New paths will be asphalt and will be 8' wide for one-way traffic and 12' wide where two-way traffic is anticipated. Paths will be curvilinear along existing topography to be consistent with the picturesque character of the Meadow and to minimize necessary grading. | Figure 24: Plan of new pathways  
Figure 25: Photograph of proposed ramp location |
| 8. Historic Paths | A brick pedestrian pathway runs along MacArthur Drive at the western/northwestern edge of the Meadow. Historic maps show that the path historically branched off to the east and ran through the Meadow, connecting quarters row to the area now occupied by the golf course. These paths are part of a larger system of historic pathways that used to wind through the campus, some of which are still extant. Remnants of the pathway running along MacArthur Drive are largely intact. There are also remnants of the path that branches to the east, but a majority of that path was buried by fill from the Scott Building in the 1950s. Some remnants of the path have been discovered during limited investigations. | The Limits of Disturbance are drawn around locations of aboveground/visible remnants, as well as the locations of known below-grade remnants. The grading plan also avoids most potential locations for remnants based information provided in historic maps. Known aboveground and belowground remnants will be protected by temporary fencing during construction. The boundaries of the Limits of Disturbance will be staked to protect potential belowground remnants during construction. AFRH does not propose any direct treatment of the pathway remnants, and all remnants will be left in place as is. | Figure 12: Historic uses, including paths  
Figure 18: Grading Plan  
Figure 26: Historic path protection |
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<td>9. Retaining Wall</td>
<td>A stone retaining wall runs along the south side of Marshall Drive, at the north end of the golf course. According to the HPP the retaining wall is a Contributing resource, with sections dating from circa 1867. A modern metal guardrail runs along the top of the retaining wall. Within the project area, Marshall Drive is approximately 4 feet above the existing golf course.</td>
<td>A golf cart ramp will be constructed to provide access from the Golf Course, over the retaining wall, to the level of Marshall Drive. The new earthen ramp will be approximately 15’ in width at the top and will accommodate two-way cart traffic. The ramp will be built up against the existing Retaining Wall. A plastic and plywood barrier will be placed between the stone surface and the ramp to protect the historic material of the wall. Several feet of the modern metal guardrail will be removed to accommodate ramp access. No historic material will be removed or altered.</td>
<td>Figure 2: Built resources</td>
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<td>Figure 24: Plan of new pathways</td>
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<td></td>
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<td>Figure 25: Photograph of proposed ramp location</td>
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<td>10. Culvert and Channel</td>
<td>AFRH-W has an extensive historic storm water management system that runs throughout the campus. Features of the system are extant in the project area, including a stone culvert running under Marshall Drive (Contributing) and a concrete channel running south from the culvert through the Golf Course. The channel previously ran north of the culvert through the Meadow but has since been replaced by a below-grade sewer line.</td>
<td>Although the culvert and channel are within the LOD and APE, they will not be directly affected by the undertaking. No work is proposed on these resources.</td>
<td>Figure 2: Built resources</td>
</tr>
<tr>
<td>11. New Golf Course Features</td>
<td>The Home has long had an established golf course on its campus. A picture book from 1931 provides a photograph of the historic golf course and describes some of its features, including various hazards. A 1944 map of the campus shows three established greens within the Meadow.</td>
<td>The relocated golf holes will receive features typical of an established golf course, including mounds, traps, and greens, as well as necessary drainage.</td>
<td>Figure 16: Photograph and caption of historic golf course</td>
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<td>Figure 20: Detail of proposed golf course features</td>
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<tr>
<td>12. New/Restored Ball Field Features</td>
<td>The Home has had a ball field for much of the last sixty years. The HPP identifies the Ball Field as a distinct and Non-Contributing landscape feature, represented by a flattened and cleared area in the northeastern corner of the Meadow. Aerial photographs show that the ball field has had a different character over the years, but by 2006, it is seen as having a skinned infield and a pitcher’s mound. During construction of the New Scott Building between 2011 and 2013, the Ball Field was temporarily removed to make way for a contractor staging area.</td>
<td>The Ball Field will be restored in its previous location. In addition to replacing the previous backstop, the ball field will receive new improvements including a skinned infield, bases, a pitcher’s mound and rubber, a reinforced home plate and batter’s box. An existing sidewalk along Arnold Drive will be extended to provide accessibility to the visitor’s side (east side) of the field.</td>
<td>Figure 28: Proposed ball field design Figure 30: Aerial showing field in 2006</td>
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**IS ANY DEMOLITION OR REMOVAL OF BUILDING OR LANDSCAPE MATERIAL ANTICIPATED?**
Landscape material will be removed at the southwestern portion of Chapel Woods West. Although Chapel Woods West is Contributing, the boundary of the woods at this location is not intact, and in general, the area of Chapel Woods on the west side of Arnold Drive has been substantially reduced since the period of significance. The shifting of the woods boundary in this location will not change the Relative Level of Significance of the resource, nor will this change diminish the contribution to the historic spatial organization of the campus.

Thirteen other Non-Contributing trees are also proposed for removal and will be replaced on a 1-1 basis per the Programmatic Agreement.

No removal of building material is proposed.

Ground disturbance of previously disturbed soil is proposed. The comparison of topographic maps shows that the topography in this area has changed since the period of significance, and that there is a substantial amount of fill on the site from the construction of the 1950s Scott Building, realignment of Arnold Road, and burying of streambed (and paved channel). A cut and fill analysis will be conducted to further support the conclusion that the topography is not intact and that the proposed ground disturbance will not affect potential archeological resources.

**IS THERE AN ADVERSE EFFECT ON RESOURCE(S)?**

<table>
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<th>YES</th>
<th>NO</th>
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The overall effect of the project will not be adverse to the Historic District. The project will affect an individual resource (Chapel Woods West), but this effect will not change the Relative Level of Significance of the resource nor its contribution to other historic resources, such as Spatial Organization. The resource will retain its character as a woodland and will continue to contribute to the Chapel Woods Character Area and the AFRH-W Historic District.
The HPP Treatment Standards for this resource recommend maintaining the spatial relationships between the landscape and other landscape or built resources; the only intact relationship that exists for this resource is between Chapel Woods West and Arnold Drive, and this relationship will be retained through this undertaking. This strip of woodland will continue to provide a buffer between the Meadow and Arnold Drive through its tree canopy and dense underbrush. The resource historically related to the streambed that ran north-south through the Meadow, but this relationship is no longer intact because of the burying of the streambed and the subsequent shift of the western boundary of the woodland. The removal of vegetation is in itself not an adverse effect, and much of this vegetation does not date from the period of significance. But the maximum amount of removal proposed may change the size of the tree canopy. AFRH is committed to minimizing or avoiding the removal of mature trees within Chapel Woods, and the clearing effort will be monitored to ensure that removal only includes what is necessary. If mature trees are removed, the trees will be replaced on a 1-1 basis per the Programmatic Agreement. Replacement trees will be located in the Chapel Woods Character Area and west of Arnold Drive to the extent possible while still maintaining the viability of replacement trees.

This alternative minimizes the overall effects of the undertaking and avoids other potential effects to resources that retain a higher level of historic integrity. Various alternatives for the 7th hole were studied, and shifting the hole would potentially affect the topography on Scott Hill and the Retaining Wall, two resources that are largely intact. It could also require the addition of more paving for pathways and the removal of more trees within the Meadow.

ATTACHMENTS:

- Map showing APE, indicating location of affected resources
- Comprehensive photos of APE
- Comprehensive photos of affected resource(s)
- AFRH-W RI/CRM Data Sheet for affected resource(s)*
- Architectural Drawings, sufficient to indicate design of proposed work**

*Please note that data sheets are not available electronically at this time. The original data sheets are available in Volume II of the Historic Preservation Plan.

**Please note that drawings are attached at the end of the document.

INTERNAL AFRH-W INFO:

NAME OF PROJECT PROPOSER REQUESTING PERMISSION TO PROCEED:
Justin Seffens, AFRH Corporate Facilities Manager
TELEPHONE: 202-288-4473
E-MAIL: Justin.Seffens@afrh.gov

ALTERNATE CONTACT: Carrie Barton, 202-309-5281, carrie.barton@preservescapes.com
WHO WILL OVERSEE THE ACTION? Justin Seffens, AFRH Corporate Facilities Manager
CONTRACTOR(S) EXPECTED TO CARRY OUT THE ACTION: Contractor not yet selected.
THE INFORMATION BELOW MUST BE FILLED ABOUT BY DCSHPO OR AGENT:

DATE OF URR RECEIPT BY DCSHPO: ____________________________

CONCURRENCE:

THE DC SHPO CONCURS WITH THE FINDING OF NO ADVERSE AFFECT.

__________________________________________

SIGNATURE OF DC SHPO                         DATE

RESOLUTION:

THE DC SHPO CONCURS WITH RESOLUTION TO MINIMIZE OR MITIGATE ADVERSE EFFECT.

__________________________________________

SIGNATURE OF DC SHPO                         DATE

IF ADVERSE EFFECTS HAVE BEEN AVOIDED OR MINIMIZED, REVISED DRAWINGS AND/OR PLANS MUST BE ATTACHED TO THIS URR FOR OFFICIAL RECORD.

IF ADVERSE EFFECTS HAVE BEEN MITIGATED, A RECORD OF AGREEMENT MUST BE ATTACHED TO THIS URR FOR OFFICIAL RECORD.
Figure 1: Area of Potential Effect. The project does not include any vertical improvements that would block identified/protected views or view sheds within AFRH-W campus. Effects will be limited to direct effects within the boundaries of the Limits of Disturbance, as indicated by the shaded area above.
**Built Resources**
1 - Central Channel (NC)
2 - Marshall Drive East Culvert (C)
3 - Stone Retaining Wall (C)
4 - Marshall Drive (C)

**Figure 2:** Built resources within project area.

**Landscape Resources**
1- Evergreen Tree Clusters (C)
2 - Meadow (C)
3 – Ball Field (NC)
4 - Chapel Woods West (C)
5 – Golf Course (NC)

**Figure 3:** Landscape resources within project area.
Figure 4: View of project area looking southwest from roof of New Scott Building.

Figure 5: View of project area looking northeast from the Scott Building.
Figure 6: View of project area looking east from MacArthur Road.

Figure 7: Bird’s-eye view of project area looking east. Previous Scott Building is visible on the far left of the image, and the Officer’s Quarters are in the foreground.
Figure 8: Map Chronology showing use of Savannah I character area over time. Space has been maintained as open and undeveloped since the 1850s and through the period of significance of the Historic District.
Figure 9: Map Chronology showing change in topography between 1944 and 1967. Current (2012) topography is similar to the topography in 1967.

Figure 10: Comparison of 1914 and 1967 maps to show change in topography of Savannah I. Contours color-coded for comparison, and 1914 topographical features are highlighted in grey.
Figure 11: Limits of Disturbance (LOD) of 1950s Scott Building construction outlined in purple. LOD extends over Savannah I (shaded in orange).

Figure 12: 1944 Map showing use of Savannah I (outlined in yellow), including golf greens, brick pedestrian pathways, and storm water channel.
- Chapel Woods West in 1914

- Chapel Woods West in 2012

**Figure 13:** 1914 Map showing change in boundaries of Chapel Woods West from 1914 to 2012. This section of Chapel Woods used to cover the streambed but was cut back after the streambed (then a channel) was buried in the 1950s. Current boundaries of Savannah I are shaded in orange.

**Figure 14:** Comparison of aerial maps form 1945 to 2014 to show comparison of individual trees scattered within Savannah I landscape (outlined in orange on each image). Images show that tree cover is denser now than historically and that most existing trees were not extant as of 1955.
Figure 15: Historic images showing that Savannah I historically had less tree cover and afforded more views across the open space.

Late 19th Century
looking south from Lincoln Cottage

Early 20th Century
looking northeast from Scott Statue across Meadow

Figure 16: Image from 1931 picture book when the golf course extended into the Meadow. Photo is taken from northeast corner of existing golf course, looking northwest toward the Scott Statue. Caption provides information on the character of the course and indicates that it was historically an established course with hazards.
Figure 17: Summary of proposed design including relocation of Holes 7 and 8 (greens, tees, sand bunkers, mounds, and drainage); selective grading, new pathways for golf carts, and the restoration of the ball field.
Figure 18: Proposed grading changes compared to 2012 topography. Please note that the pile of cut from the construction of the new Scott Building is indicated in the narrow hatching on the 2012 topography. The cut has been temporarily spread out on the north end of the site until the grading plan for this undertaking is finalized.
Figure 19: Details of grading plan around the greens.

Figure 20: Details of proposed golf course features around the 7th and 8th greens.
Figure 21: The two Contributing evergreen clusters will be protected by temporary construction fencing as shown on this plan.

Figure 22: An area of Chapel Woods West will be cleared to accommodate the dogleg for the 7th Hole. The western boundary of Chapel Woods West is no longer intact since the burying of the streambed and construction of the Scott Building in the 1950s.
Figure 23: Image of western edge of Chapel Woods West, looking north from Marshall Drive (at location of Marshall Drive Culvert East)

Figure 24: Proposed new pathways for pedestrians and golf carts. New golf cart ramp shown just south of Marshall Drive and indicated by arrow.
Figure 25: View of location of proposed golf cart ramp, looking north from existing golf course.

Figure 26: Known aboveground and belowground remnants of historic pathways will be protected by temporary construction fencing, as shown on this plan.
**Figure 27:** Plan of trees proposed for removal and concept for locations of replacement trees. New tree locations are based on general location of removed trees and/or 1914 tree locations where possible.

**Figure 28:** Design for new ball field includes a field in the same location of the previous field. Improvements include skinned infield, reinforced batter’s box and catcher’s circle, pitcher’s mound, permanent bases, pitcher’s rubber, and sidewalk extension to the visitor’s side of the field.
Figure 29: The view southward from Lincoln Cottage was identified as compromised in the 2008 AFRH-W HPP. Demolition of the 1960s Scott Building has reopened this viewshed, but trees currently block that view.
Figure 30: 2006 aerial of the Home, looking south. Ball Field is shown as having a skinned infield and pitcher’s mound in the location of the proposed new Ball Field.
MARCH 2013

MEADOW RESTORATION

TWO NEW GOLF HOLES AND SOFT BALL FIELD

WASHINGTON DC

ARMED FORCES RETIREMENT HOME
New Green 7 & 8

Construction

No. 7 Green
Elevation at Center Stake

Existing - 300
Proposed - 299

Cavity Size

No. 8 Green
Elevation at Center Stake

Existing - 284.5
Proposed - 285.5

Cavity Size

Information:

(5550 SQ. FT.)
(5475 SQ. FT.)

DRAINAGE

ORIENTATION and GRADING

NEW No. 7
GREEN

NEW No. 8
GREEN

DRAINAGE

ORIENTATION and GRADING
NOTES:
1. 1st and 3rd base are measured from the rear tip of home plate to the back corner of base. 2nd base is measured from the center of the base to the baseline.
2. Pitching distances are measured from the front of the pitcher's plate to the rear point of the home plate.
3. Grade the pitcher's circle flat, then transition into the surrounding grades.
4. Install a 2'-5" OD pipe with a removable cap near the ends of each base line to receive a removable padded pipe.
5. The Back Stop fence is based on a fence design C2446 by Hoover Fence Co., phone 1-800-355-2335. A similar fence may be used.
6. All clay bricks and red clay conditioners were specified as per Diamond Pro. Their website is diamondpro.com and their phone number is 1-800-228-2987. They will direct you to a local representative. Similar products may be used meeting the same analysis and consistency.
7. Refer to the specifications for details on installing soil for the skinned infield and pitcher's circle.
8. Provide softball bases as shown in the detail.
9. Use the tree protection fence to create construction line. In some cases a silt fence may be installed in front of the tree protection fence.
AFRH-W URR #34: GOLF HOLE RELOCATION AND BALL FIELD RESTORATION

Proposed Mitigation

Submitted by: Armed Forces Retirement Home
August 26, 2014

AFRH submitted URR #34 to the DCSHPO for the proposed relocation of two golf holes and the restoration of the ball field. Based on consultation between AFRH and DCSHPO since the submission, DCSHPO finds that there will be an adverse effect to historic resources, specifically to Chapel Woods West (RLS: Significant). This determination is based on the scope presented in the URR dated 7 August 2014 and submitted electronically to DCSHPO on 15 August 2014.

In response to the DCSHPO’s finding, AFRH proposes the following mitigation to resolve the potential effect:

1. **Adopt the Land Trust Standards and Practices (revised 2004), published by the Land Trust Alliance, for the purpose of designating a habitat conservation zone in Chapel Woods.** In 2014, AFRH designated Chapel Woods West east of Arnold Drive as a habitat conservation zone as part of its LEED accreditation for the new Scott Building. To mitigate the effects of the proposed undertaking in URR #34, AFRH will revise the designation and expand the zone boundaries to include the section of Chapel Woods West that is located west of Arnold Drive (this section was previously excluded because the habitat boundaries were drawn congruent with the boundaries of the Chapel Woods Character Area, as defined in the AFRH-W Historic Preservation Plan). The revised and expanded boundaries will encompass the entirety of Chapel Woods West, as defined in the AFRH-W Historic Preservation Plan. This designation will bolster the protection of the area by ensuring the agency’s commitment to maintaining the habitat consistent with these standards and practices. Specifically, AFRH will adopt an adapted version of the standards for “Fee Land Stewardship” set by the Land Trust Alliance (see Attachment A). These standards will include appropriate uses and improvements for Chapel Woods (Attachment B).

2. **Replace removed mature trees on a 1-1 basis, and use replacement trees to replenish areas of the woodland that have been affected by previous disturbance.** The area of Chapel Woods West located west of Arnold Drive has substantially decreased since the period of significance of the AFRH-W Historic District. Most of this reduction is due to the substantial disturbance of the area in the 1950s, during the construction of the previous Scott Building, the realignment of Arnold Road, and the burying of the streambed that ran north-south through the Meadow. To ensure zero net loss of woodland area, AFRH will replace all removed mature trees on a 1-1 basis (as required by the Programmatic Agreement), and locate those trees within the area of Chapel Woods West that was
depleted by these previous undertakings (see Attachment C). Mature trees will be defined as a tree with a 3” caliper, as measured from 24” above the ground. Replacement trees will follow all guidelines set forth in the Historic Preservation Plan and Master Plan, including:

a. The species of replacement trees will be the same plant species (if available and native to the region), consistent with guidance from the Historic Preservation Plan. If possible, cultivars of the original plant material will be used.

b. The species of the replacement trees will be consistent with the removed trees in form and function, consistent with the guidelines in the Master Plan (p. 37). The location of the trees will accomplish replenishing the woodland, and the species will be chosen to ensure a sufficient height and canopy.

c. Replacement trees will have a minimum caliper of 3 inches, consistent with guidance from the Master Plan (p. 60).
ATTACHMENT A

Stewardship Practices

The following practices are an adaptation of Standard 12: Fee Land Stewardship, of the Land Trust Standards and Practices, published by the Land Trust Alliance and revised in 2004. AFRH has adapted these practices to reflect responsible management of a federally owned property.

AFRH will manage a program of responsible stewardship for the land it holds for conservation purposes:

1) AFRH will annually assess the immediate and long-term financial and management implications of maintaining its grounds, including Chapel Woods.

2) AFRH will establish principles to guide the stewardship of Chapel Woods, including appropriate uses and improvements (see Attachment B).

3) AFRH will inventory the natural (tree survey) and cultural (HPP) features of Chapel Woods.

4) Undertakings in Chapel Woods will occur only when:
   a) the activity poses no significant threat to the important conservation values;
   b) the activity reduces the threat, reduces threat, or restores ecological processes; and/or
   c) the activity advances learning and demonstration opportunities.

5) AFRH will clearly mark the boundaries of the protected habitat of Chapel Woods and regularly monitor the woodland for potential management problems. If problems are observed or anticipated, AFRH will take action to rectify those problems.

6) AFRH will perform management duties in a timely and responsible manner.

7) AFRH will promote educational or interpretive programs that focus on the historic and ecological significance of Chapel Woods.
APPROPRIATE USES AND IMPROVEMENTS

All uses and improvements to the Chapel Woods area will protect and enhance the natural woodland, create opportunities to enjoy the natural flora and fauna of the landscape, and accommodate passive and active therapy in close proximity to the campus core of AFRH-W. The following uses and improvements are consistent with the existing AFRH-W Historic Preservation Plan, AFRH-W Master Plan, and AFRH-W Master Landscape Plan.

- Natural woodland and wildlife habitat.

- Low-intensity recreation:
  - Walking or low-intensity bike paths using and/or extending existing trails
  - Low-intensity horticulture (in areas currently cleared)
  - Therapeutic and meditation gardens (in areas currently cleared)

- Low-scale development consistent with the AFRH-W Master Plan: The Master Plan accommodates low-scale development in the current location of the gravel parking lot and Non-Contributing Auto Hobby Shop. The approved location of development is specified through a conceptual parcel plan (see figure 5). Development shall follow guidelines set forth and approved in the Master Plan.

![Parcel Plan for the Chapel Woods subzone of the AFRH Zone, Master Plan p. 66](image-url)
**ATTACHMENT C**

**Areas of Woodland Replenishment**
The following plan shows areas where replacement trees will be located to the extent possible to replenish areas of Chapel Woods West that have been depleted by previous undertakings.

![Figure 2: Proposed replenishment plan for Chapel Woods West](image-url)
TO: Justin Seffins, AFRH FPO, and Carrie Barton PreserveScapes,

PROJECT NAME/DESCRIPTION: Armed Forces Retirement Home, URR 34 (Golf Course Relocation)

PROJECT ADDRESS/LOCATION DESCRIPTION: Armed Forces Retirement Home NHL grounds, NE

DC SHPO PROJECT NUMBER: 13-676

The DC State Historic Preservation Office (DC SHPO) has reviewed the above-referenced federal undertaking(s) in accordance with Section 106 of the National Historic Preservation Act and has determined that:

1. trees will be planted within the portion of Chapel Woods west of Arnold Drive, so that there is no net loss of area of the woods;
2. removed trees will be replaced on a one-to-one basis consistent with the master plan and associated documents; and
3. AFRH will establish a habitat conservation zone in the woods, there will be no adverse effect from the removal of some trees at the southwest corner of the woods for the creation of new golf holes and fairways.

The proposed location has not been surveyed for archaeological resources, and during earlier work in the area buried historic brick sidewalks and other features were identified under approximately 3 feet of fill. It appears that minimally invasive elements of the golf course will not affect the original ground surface, however, detailed vertical limits of disturbance were not available, so it is possible that the proposed drainage features needed for the golf course will extend below the fill. Therefore this is a Conditional finding of No Adverse Effect for archaeology, with the conditions that: 1) GIS cut and fill analysis is conducted, and possible Phase I archaeological identification survey is conducted if the GIS results merit it; and 2) continued consultation on the vertical depths of disturbance as they relate to the fill covering the original ground surface. Should there be unanticipated archaeological discoveries during the undertaking, please contact Dr. Trocolli at 202-442-8836 or ruth.trocolli@dc.gov.

☐ This project will have no adverse effect on historic properties conditioned upon fulfillment of the measures stipulated below.

☐ Other Comments / Additional Comments (see below):

With the August 26, 2014 written commitment that:

1. trees will be planted within the portion of Chapel Woods west of Arnold Drive, so that there is no net loss of area of the woods;
2. removed trees will be replaced on a one-to-one basis consistent with the master plan and associated documents; and
3. AFRH will establish a habitat conservation zone in the woods, there will be no adverse effect from the removal of some trees at the southwest corner of the woods for the creation of new golf holes and fairways.

The proposed location has not been surveyed for archaeological resources, and during earlier work in the area buried historic brick sidewalks and other features were identified under approximately 3 feet of fill. It appears that minimally invasive elements of the golf course will not affect the original ground surface, however, detailed vertical limits of disturbance were not available, so it is possible that the proposed drainage features needed for the golf course will extend below the fill. Therefore this is a Conditional finding of No Adverse Effect for archaeology, with the conditions that: 1) GIS cut and fill analysis is conducted, and possible Phase I archaeological identification survey is conducted if the GIS results merit it; and 2) continued consultation on the vertical depths of disturbance as they relate to the fill covering the original ground surface. Should there be unanticipated archaeological discoveries during the undertaking, please contact Dr. Trocolli at 202-442-8836 or ruth.trocolli@dc.gov.

BY: Ruth Trocolli, Ph.D.
State Historic Preservation Office Archaeologist

DATE: September 12, 2014
Carrie,

Please see the attached.

Tim Dennee
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1100 4th Street, SW
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202 442 8847
fax 202 442 7638
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www.planning.dc.gov/hpo

Give your kids a smart start. Come to the MLK Library for the STAR Family Festival on Sept. 13 at 11 a.m. and see how easy and fun early learning can be. For more information, visit http://dclibrary.org/starfestival

URR 34 SHPOForm.pdf
80K
Carrie Barton <carrie.barton@preservescapes.com>  
Fri, Aug 15, 2014 at 10:51 AM

To: Tim Dennee <timothy.dennee@dc.gov>, Ruth Trocolli <ruth.trocolli@dc.gov>  
Cc: Jennifer Hirsch <jennifer.hirsch@ncpc.gov>, Justin Seffens <justin.seffens@afrh.gov>, Molly McDonald <molly.mcdonald@preservescapes.com>  

Tim and Ruth,
On behalf of AFRH, we are submitting URR 34 for the relocation of two golf holes and the restoration of the Ball Field. The full URR and drawing attachment can be accessed here:

**URR 34 and Attached Drawings**

Ruth, please note that based on our meeting in July, AFRH is in the process of working with Paul Kreisa to conduct a cut and fill analysis for the entire campus to expand upon the more basic topo comparison that we did for this URR. We will keep you updated on the status of the additional analysis if you need it to conclude your assessment of effect for this URR.

Once Section 106 is concluded, we will submit for final design review through NCPC and CFA, as discussed at our meeting in July.

Please let me or Justin Seffens know if you have any questions or if you have any difficulties accessing the file. We are happy to discuss the project with you at any time.

And have a great weekend!

Thanks,
Carrie

Carrie Barton  
PRESERVE / scapes  
1025 Thomas Jefferson Street, NW, Suite 170-C, Washington, DC 20007  
mobile: (202) 309-5281 / email: carrie.barton@preservescapes.com / www.preservescapes.com
All,

Please see attached the proposed mitigation for URR 34. DCHPO determined that the effect to Chapel Woods would be adverse, and AFRH proposes to mitigate the potential adverse effect with two actions:

1. Expand the boundaries of an existing habitat conservation zone to encompass the section of Chapel Woods that is located west of Arnold Drive. AFRH will adopt practices and standards that are established for this type of designation. These practices include, among several other things, establishing boundaries for the woodland.
2. Locate replacement trees within previously diminished areas of Chapel Woods West, west of Arnold Drive, so that the overall area of this specific section of the woodland does not change.
Details regarding these proposed actions are provided within the attached document.

Thanks,
Carrie

Carrie Barton

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On Fri, Aug 15, 2014 at 12:32 PM, Carrie Barton <carrie.barton@preservescapes.com> wrote:

Tim,

Understandable. I'm torn though on what to do if the tree growth we are looking at dates from outside the period of significance. We have really gone back and forth about it a lot. For instance: if we have an 1890 building, and it had a wing that was torn down in 1955, but a new wing was built in its place in 1980, would we protect that wing because it is within the footprint of the original wing if the POS ends in 1951? I realize comparing a built resource and landscape resource may be tricky, but I am just thinking about this as we go. It is an interesting comparison nonetheless. So if we could show that the vegetation slated for removal dates outside the period of significance, would we require something beyond the 1:1 replacement that is already called for in the MP, HPP, and PA. That was the mitigation we set up to protect overall tree growth at AFRH and to restore removed trees, regardless of whether they are historic.

We have thought about the "invitation" part previously and have considered other options for how to ensure that the invitation does not stay open for more intact areas of the woodland. We can revisit that if you think that there is still a threat or adverse effect.

Thanks for thinking this through.

Carrie

On Fri, Aug 15, 2014 at 12:16 PM, Dennee, Timothy (OP) <timothy.dennee@dc.gov> wrote:

I tend to see it a little differently: that the loss of woods previously (as you mention, the western boundary
has moved east) should not be an invitation to more loss, and that the HPP, etc. call for restoring trees when they are lost.

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From: Carrie Barton [mailto:carrie.barton@preservescapes.com]
Sent: Friday, August 15, 2014 12:11 PM
To: Dennee, Timothy (OP)
Cc: Trocolli, Ruth (OP); Jennifer Hirsch; Justin Seffens; Molly McDonald
Subject: Re: URR 34

We have had many conversations with you about Chapel Woods, so I have put a lot of time and focus on this issue through the URR. In the past, discussions are typically focused on the larger woodland to the east, and I think what we (or at least I) did not understand before is how much change there has been on this swath of Chapel Woods, west of Arnold Drive. The integrity analysis in the HPP did not delve into a detailed study of the area, and this area was completely forgotten about when drawing the Character Area boundaries, which is an issue we didn't even touch in the URR (see map attached). What we found this time around is that this area was previously cut back even farther than it is now, and much of the western boundary is (relatively) new growth that has come back since the disturbance in the 1950s (see aerial comparison). Even with that new growth the western boundary is not what it used to be, and the overall area of the woodland west of Arnold Drive is greatly reduced.

Understanding the changes over time, we have looked at this a couple of different ways. (1) The western boundary of the woods is not intact, and as long as we retain a woodland buffer (the spatial relationship) between the Meadow and Arnold Drive, a shift in the western boundary in itself does not change the overall character or RLS of the woodland and is therefore not adverse OR (2) Because of previous disturbance, what is left is even more precious and should not be disturbed. We went back and forth about this a lot at the meeting with Ruth and Shane and much more internally at AFRH. In the end, because the fact that much of this vegetation does not date from the period of significance, the latter thought process didn't make as much sense to me. AFRH is still committed to the 1:1 replacement of any mature trees, but we came to the ultimate conclusion that the overall effect does not require additional mitigation.

Thoughts? I am happy to look into this further.
On Fri, Aug 15, 2014 at 11:46 AM, Dennee, Timothy (OP) <timothy.dennee@dc.gov> wrote:

Carrie,

Thanks. It’s a good URR, but I think that the further cutting back of the Chapel Woods is problematic. I’ve probably mentioned the importance of maintaining the woods previously.

Tim Dennee
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timothy.dennee@dc.gov
www.planning.dc.gov/hpo

From: Carrie Barton [mailto:carrie.barton@preservescapes.com]
Sent: Friday, August 15, 2014 10:51 AM
To: Dennee, Timothy (OP); Trocolli, Ruth (OP)
Cc: Jennifer Hirsch; Justin Seffens; Molly McDonald
Subject: URR 34

Tim and Ruth,

On behalf of AFRH, we are submitting URR 34 for the relocation of two golf holes and the restoration of the Ball Field. The full URR and drawing attachment can be accessed here:

URR 34 and Attached Drawings
Ruth, please note that based on our meeting in July, AFRH is in the process of working with Paul Kreisa to conduct a cut and fill analysis for the entire campus to expand upon the more basic topo comparison that we did for this URR. We will keep you updated on the status of the additional analysis if you need it to conclude your assessment of effect for this URR.

Once Section 106 is concluded, we will submit for final design review through NCPC and CFA, as discussed at our meeting in July.

Please let me or Justin Seffens know if you have any questions or if you have any difficulties accessing the file. We are happy to discuss the project with you at any time.

And have a great weekend!

Thanks,
Carrie

Carrie Barton

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Help DC become an Age Friendly city by participating in the Block by Block Walk on Saturday, September 6. Sign up here to volunteer.
See the conversation that went on offline with Tim. He has officially determined that he does not concur with our finding of no adverse effect. I told him I would come work with you to come up with a mitigation package by the end of the week, so I will go ahead and put something together for your review.

---

Forwarded message
From: Carrie Barton <carrie.barton@preservescapes.com>
Date: Mon, Aug 18, 2014 at 1:43 PM
Subject: Re: URR 34
To: "Dennee, Timothy (OP)" <timothy.dennee@dc.gov>

Tim,
Since I came on board with AFRH in April, I have worked with the golf course architect to see what options we have in terms of design, and the alternative you are reviewing is the one that minimizes the overall cumulative effect on the campus and resources. If you do not concur that there is no adverse effect, I believe that mitigation for the potential effect on Chapel Woods is preferable to shifting the hole and affecting other resources that are considerably more intact. I will work on developing mitigation to see if we can resolve the effect appropriately and in a way that ensures the protection of the woodland. Justin is out of the office until Thursday, but we should have something to you by the end of the week.
Carrie

On Mon, Aug 18, 2014 at 1:35 PM, Dennee, Timothy (OP) <timothy.dennee@dc.gov> wrote:

What I am saying is simply that the woods should remain where it is, and replacement trees should go where trees are removed.

Tim Dennee
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Yeah, I knew the building analogy was tough, and yet still something worth asking and thinking about when trying to sort through this. I understand your point.

We are proposing 1:1 replacement of any removed mature trees in Chapel Woods, and based on our assessment on site, there would still be a substantial woodland buffer. So to clarify one more thing: you are saying that the 1:1 replacement of removed mature trees in the woodland is not sufficient, even if the replacement trees are located within the Chapel Woods Character Area? Or even if we can ensure they are within Chapel Woods West, west of Arnold Drive if possible?

On Fri, Aug 15, 2014 at 5:24 PM, Dennee, Timothy (OP) <timothy.dennee@dc.gov> wrote:

Yes, I guess I disagree. I don’t think the analogy with a building is fully applicable because a wood is a living thing, and few of the trees probably go back to the founding of the institution; they replace themselves. The extent of the woods is important; if it gets too thin, I think it really loses its character. And I don’t see why the treatment of a landscape consisting of trees would be lesser than that for individual or copses of trees that are not considered particularly important.
Agreed, but I have determined that there is not an adverse effect because of the reasons stated in the URR. Just to be clear, are you disagreeing with the determination of effect?

Tim Dennee  
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Tim,
I am not sure if my last email got us off track. How would you like to proceed?

Carrie