

Armed Forces Retirement Home



AFRH-W Master Plan Amendment #2 Section 106 Early Consultation Consulting Party Comment Summary

Comment Period: August 20 – September 3, 2021

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

Table 1: Consulting Party Comment Summary

Consulting Party	Date Received	Comment
Advisory Council on Historic Preservation (see Attachment A)	09/01/2021	No comment
ANC 1A	09/08/2021	<ul style="list-style-type: none"> • Comment on parking • Comments on inclusion of the Heating Plant (already approved in Amendment #1) • Comment on density and impact of more residential use on the Heating Plant.
ANC 5A (see Attachment C)	09/01/2021	Support, no comment
Arlington National Cemetery (see Attachment D)	09/08/2021	No comment
Committee of 100 on the Federal City (see Attachment E)	08/30/2021	<ul style="list-style-type: none"> • Support • Comment on archaeology language (recommendations v. requirements) • Comment on the street edge guidance related to the delineation of the historic pasture and need to clarify objectives.
National Capital Planning Commission (see Attachment F)	09/08/2021	No comment
National Park Service (see Attachment G)	09/01/2021	No comment

The following table provides all Consulting Party comments for review. Copies of all original correspondence are included as attachments.

Table 2: Consulting Party Comments

	Consulting Party	Date Received	Comment
1	Advisory Council on Historic Preservation (see Attachment A)	09/01/2021	While we have no comments regarding the second amendment to the Master Plan, we remain available to provide our advisory opinions in the event of a dispute during the 2008 PA's implementation.
2	ANC 1A (see Attachment B)	09/08/2021	Related to the Section 106 review, ANC1A has no objection to the inclusion of Townhomes, the reconfiguration of Parcel M, or other areas not specifically addressed in this response.
3	ANC 1A (see Attachment B)	09/08/2021	ANC1A notes that the amendment proposes to change planned underground parking to above ground facilities. We understand that this is a less costly way to proceed. We also note that the amendment states that overall parking demand will be less due to the density and land use changes. However, a key and historic feature of the AFRH-W is open green space and meadows. With this in mind, shifting parking to above ground facilities is contrary to the historic nature of the AFRH-W and every effort needs to be taken to preserve and maintain as much green space as possible – including strategies that discourage and minimize the need to draw traffic to and from the campus. With this in mind, we do not support surface parking lots or an increase in the above ground-built environment to house cars. This would have a significant negative impact on the historic nature of the AFRH-W.
4	ANC 1A (see Attachment B)	09/08/2021	In general, ANC1A is not opposed to the new building program that includes more residential and less commercial uses or the additional density. We recognize that residential uses are in many ways preferable to commercial uses by reducing destination traffic to the campus. However, as this amendment seeks to incorporate changes approved in Amendment #1, we do have general concerns related to preserving historic viewsheds, maintaining as low a profile as possible in the overall building types, and preserving as much greenspace as possible. More specifically, we feel that the shift from commercial to residential uses may have a negative impact on the Heating Plant added to Zone A in Amendment #1 without

	Consulting Party	Date Received	Comment
			additional protections to prevent further degradation of the AFRH-W's historic resources, which we address below.
5	ANC 1A (see Attachment B)	09/08/2021	ANC1A supports the overall reactivation of the 1907 Power House (Building 46) designed by Capt. John S. Sewell of the Corps of Engineers within the overall amendment plan provided additional steps are taken to minimize negative impacts on this historic resource (listed below). The ANC sees the potential benefits of adaptively reusing the historically contributing buildings associated with the central heating plant in Zone A, but does not agree that doing so will be without negative impacts to the historical integrity of the 1907 Power Plant without a stronger commitment to its protection and preservation. As a purpose-built utilitarian power plant building, many observers are unlikely to understand the importance of the structure or recognize that it is a scarce building type in the District of Columbia. Therefore, ANC1A requests that the following actions be considered as part of the Amendment process: We request that the 1907 Power Plant be reviewed and put forward for consideration as a landmarked structure. Early Twentieth Century power plant structures are scarce in D.C., with ANC1A only being aware of a similar building on the campus of Catholic University. These structures were necessary for the support of their respective campuses, especially as they existed in what was then largely undeveloped rural areas of D.C. with no access to city-wide services. These plants were required for each campus to be self-sufficient. Furthermore, in the case of AFRH-W, the power plant was a critical element not just for residency, but also for the modern operation of the AFRH-W hospitals.
6	ANC 1A	09/08/2021	We equally request that a history story board

	Consulting Party	Date Received	Comment
	(see Attachment B)		or some other information marker be included near the Power Plant to contextualize the importance of this building and make its history accessible to future residents of the campus and Zone A development.
7	ANC 1A (see Attachment B)	09/08/2021	In addition to the Power House's scarce building type, its preservation is important in the broader context of construction of Government facilities at the AFRH-W and beyond. By the time Capt. John S. Sewell of the Corps of Engineers resigned from his post in April 1907, he had overseen the construction of the AFRH-W mess hall, power house, and other buildings of the campus as well as the new government printing office, extensive improvements to the Washington Barracks reservation, managed construction of the Army War College, and construction of the new building for the Department of Agriculture. The history and preservation of these structures collectively is important. ANC1A looks forward to our continued engagement in the development of Zone A, and to the additional meetings, reviews, and conversations that need to occur to address our additional concerns related to housing affordability, equitable access to green space, improving connectivity to the campus, and mitigating traffic impacts.
8	ANC 5A (see Attachment C)	09/01/2021	Our preliminary review suggest that the proposed changes are consistent with the overall development plans, including the envisioned Cloverleaf at North Capital and Irving, and are reflective of welcomed improvements that can be supported by the community. As such, in accordance with Section IV.c2 of the 2008 AFRH-W Programmatic Agreement (PA), ANC5A support the proposed changes and is pleased to submit the following comments regarding AFRH's Proposed Masterplan Amendment. Please be advised that, due to legislative restrictions, ANCs are generally unable to make official decisions within 15 days. As such, ANC5A respectfully ask that this response be accepted as our preliminary response pending final approval at our next regularly scheduled meeting on September 22,

	Consulting Party	Date Received	Comment
			2021 (6:45pm).
9	Arlington National Cemetery (see Attachment D)	09/08/2021	The proposed areas of change to the Master Plan will have no effect on the Soldiers' and Airmen's Home National Cemetery, a property eligible for the National Register of Historic Places and owned and managed by the Department of the Army.
10	Committee of 100 on the Federal City (see Attachment E)	08/30/2021	We are pleased to see the considerable attention to detail incorporated in this Master Plan Amendment, respectful as it is of the wonderful resource the AFRH-W campus is and pleased to participate in this early consultation process on the proposed MPA amendment.
11	Committee of 100 on the Federal City (see Attachment E)	08/30/2021	Specific Design Objectives, Pasture Street Edge, pg. 11: - The language used, "delineate and emphasize the historic pasture," may be too vague to be evaluated. Is the intention to isolate the pasture from the townhouses, or to blend the back yards of the townhouses with the pasture? "Delineate...the pasture" does not appear to state with sufficient clarity what the goal is here and more guidance on this point would make it easier for the developer to see what the goal is, and for meaningful evaluation of whether or not it has succeeded. For example, if isolation of the pasture from the townhouses is intended, perhaps there should be language about blocking the view of the townhouses from the pasture and vice-versa, or, on the contrary, if the yards of the townhouses are intended to blend directly into the yards, some guidance telling the developer how to "delineate" more clearly, to the end of avoiding confusion on what is the desired outcome.
12	Committee of 100 on the Federal City (see Attachment E)	08/30/2021	Exhibit 7: Archaeology, page 17 The revised language concerning archaeological assessment contains this

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

Consultation Notes:

- The following Consulting Parties requested an extension to submit official comments: National Capital Planning Commission, Friends of the Old

Soldiers' Home, ANC 1A, and Arlington National Cemetery. Note that ANC 5A provided a reply that will be formalized at the commission meeting on 9/22/21.

- The following Consulting Parties did provide a written response to the Early Consultation Memorandum:
 - D.C. Historic Preservation Office
 - U.S. Commission of Fine Arts
 - D.C. Office of Planning
 - National Trust for Historic Preservation
 - D.C. Preservation League
 - Advisory Neighborhood Commission 4C
 - Advisory Neighborhood Commission 4D
 - Advisory Neighborhood Commission 5E
 - U.S. Army
 - The Catholic University of America
 - Ward 1 Councilmember
 - Ward 4 Councilmember
 - Ward 5 Councilmember
 - Military Officer Association of America
 - Friends of the Old Soldiers' Home
 - President Lincoln's Cottage

ATTACHMENT A:



September 1, 2021

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

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

Dear Mr. Seffens:

In August 20, 2021, the Advisory Council on Historic Preservation (ACHP) received your notification regarding the referenced action in accordance with Stipulation IV(C) of the *Programmatic Agreement Among the Armed Forces Retirement Home, National Park Service, the National Capital Planning Commission, the Advisory Council on Historic Preservation, and the District of Columbia State Historic Preservation Officer Regarding the Armed Forces Retirement Home - Washington, D.C. Master Plan and On-Going Maintenance and Rehabilitation of Historic and Cultural Resources and Development Activities* (2008 PA as amended). While we have no comments regarding the second amendment to the Master Plan, we remain available to provide our advisory opinions in the event of a dispute during the 2008 PA's implementation.

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

Sincerely,

A handwritten signature in blue ink that reads "Jaime Loichinger".

Jaime Loichinger
Assistant Director
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION
401 F Street NW, Suite 308 • Washington, DC 20001-2637
Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

ATTACHMENT B:



ADVISORY NEIGHBORHOOD COMMISSION 1A

SMD 1A01 – Layla Bonnot
SMD 1A04 – Chris Hall
SMD 1A07 – Mukta Ghorpadey
SMD 1A10 – Rashida Brown

SMD 1A02 – Dieter Lehmann Morales
SMD 1A05 – Christine Miller
SMD 1A08 – Kent C. Boese
SMD 1A11 – Dotti Love Wade

SMD 1A03 – Vacant
SMD 1A06 – Brandolon Barnett
SMD 1A09 – Michael Wray
SMD 1A12 – Vacant

September 8, 2021

(via email only)

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

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

Dear Mr. Seffens,

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

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

Parking

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

Advisory Neighborhood Commission 1A
3400 11th Street NW, #200
Washington, DC 20010

ANC1A – MPA#2 COMMENTS – RESPONSE TO SECTION 106 REVIEW FOR AFRH-W

September 8, 2021
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Density and Land Use

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

1907 Power Plant Building

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

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

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

In addition to the Power House's scarce building type, its preservation is important in the broader context of construction of Government facilities at the AFRH-W and beyond. By the time Capt. John S. Sewell of the Corps of Engineers resigned from his post in April 1907, he had overseen the construction of the AFRH-W mess hall, power house, and other buildings of the campus as well as the new government printing office, extensive improvements to the Washington Barracks reservation, managed construction of the Army War College, and construction of the new

ANC1A – MPA#2 COMMENTS – RESPONSE TO SECTION 106 REVIEW FOR AFRH-W

September 8, 2021

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

ANC1A looks forward to our continued engagement in the development of Zone A, and to the additional meetings, reviews, and conversations that need to occur to address our additional concerns related to housing affordability, equitable access to green space, improving connectivity to the campus, and mitigating traffic impacts.



Kent Boese, ANC 1A Chair
SMD 1A08

CC: comments@afrh.gov
Carrie Barton – carrie.barton@preservespaces.com

ATTACHMENT C:

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

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

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

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

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

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

Thanks in advance for acknowledgment and response.

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

Sent from my iPhone

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ATTACHMENT D:

Stevens, Rebecca L CIV (USA) <rebecca.l.stevens35.civ@mail.mil>

Wed, Sep 8, 2021 at 12:32 PM

To: "Justin Seffens" <Justin.Seffens@afrh.gov>

Cc: "Carrie Barton (carrie.barton@preservescares.com)" <carrie.barton@preservescares.com>, "Sullivan, Agnes K CIV USARMY HQDA ANC OSA (USA)" <agnes.k.sullivan.civ@mail.mil>

Sir,

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

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

Rebecca L. Stevens, AIA
Cultural Resources Manager
Arlington National Cemetery
1 Memorial Avenue
Arlington, Virginia 22211

ATTACHMENT E:

From: Kirby Vining <chair@committeeof100.net>

Sent: Monday, August 30, 2021 8:40 PM

To: Comments <Comments@afrh.gov>

Subject: C100: MPA #2 Comments from the Committee of 100 on the Federal City - Kirby Vining

Dear Mr. Seffins,

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

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

Specific Design Objectives, Pasture Street Edge, pg. 11:

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

Exhibit 7: Archaeology, page 17

The revised language concerning archaeological assessment contains this phrase:

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

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

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

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

-Kirby Vining, Chair, C100.

<http://committeeof100.net/>

<https://twitter.com/Commof100DC>

<https://www.linkedin.com/company/committee-of-100-on-the-federal-city/about/>

ATTACHMENT F:

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

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

Thanks
Jamie

Jamie E. Herr, AICP, LEED-AP

Community Planner
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ATTACHMENT G:

Smith, Kathryn G <Kathryn_Smith@nps.gov>

Wed, Sep 1, 2021 at 3:31 PM

To: "comments@afrh.gov" <comments@afrh.gov>

Cc: Justin Seffens <justin.seffens@afrh.gov>, Carrie Barton <carrie.barton@preservescapescapes.com>, "Gossett, Tanya" <Tanya_Gossett@nps.gov>, "Krueger, Bradley A" <Bradley_Krueger@nps.gov>, "Bartolomeo, Nick" <Nick_Bartolomeo@nps.gov>

Mr. Seffins:

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

Sincerely,
Kathryn

Kathryn G. Smith

National Historic Landmarks & National Register Coordinator
National Park Service
Interior Region 1 - National Capital Area
202.619.7180
202.913.3859 mobile

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

NCA Website <https://www.nps.gov/RESSNCR>

NHL Website <http://www.nps.gov/nhl>

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