

U.S. Armed Forces Retirement Home Record of Decision

Armed Forces Retirement Home – Washington Master Plan 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. 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 mitigations 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 Armed Forces Retirement Home (AFRH), it is my decision to:

- 1) Implement Alternative 3A (hereafter referred to as the Selected Alternative) for the creation of a master plan for AFRH-W that will sustain the AFRH and its primary source of funding, the AFRH Trust Fund.

This Record of Decision (ROD) documents the specific components of my decision and the rationale for my decision. This decision is based on analyses contained in the Draft Environmental Impact Statement (EIS) issued in May 2005; the Final EIS issued in November 2007; the comments of Federal and state 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 build alternatives and the no build 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 AFRH-W 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, low scale residential development along Park Place, and institutional uses around the AFRH administrative and residential areas;
 - Providing park and open space amenities for AFRH-W residents and the surrounding community;
 - Providing affordable housing; and
 - Providing commercial and retail opportunities to serve the surrounding community.
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3 Background and Purpose and Need for Proposed Action

The purpose of the proposed action is to create a Master Plan for the Armed Forces Retirement Home–Washington (AFRH-W) that will sustain AFRH-W and its primary source of funding, the AFRH Trust Fund. Several alternatives have been prepared for the AFRH-W Master Plan. Potential development under each alternative was defined after taking into consideration compatibility with AFRH's mission, compatibility with historic resources and existing environmental conditions, compatibility with surrounding land uses, and analysis of real estate market conditions in the area. Private or governmental development on AFRH-W would occur primarily through leases or sales.

AFRH FINANCIAL BACKGROUND

The Armed Forces Retirement Home is the nation's oldest retirement community for enlisted military veterans. The institution needs new sources of revenue to provide appropriate facilities and services to its elderly residents.

AFRH is an independent federal agency under the jurisdiction of the Secretary of Defense. AFRH relies upon its Trust Fund for operations, maintenance and construction of equipment and buildings. It receives no annual appropriation from Congress.

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AFRH operates under severe financial constraints beyond its control. The Trust Fund is financed with a 50 cent payroll deduction from active duty military, fines and forfeitures from military disciplinary actions (which vary depending upon operational tempo), fees from residents which are capped at 35% of income (less than 1/2 of residents pay the maximum) and interest income. AFRH is restricted by law to investments in low-yield Treasury bonds. In addition, Federal law prohibits AFRH from soliciting contributions, applying for grants, or running capital fundraising campaigns.

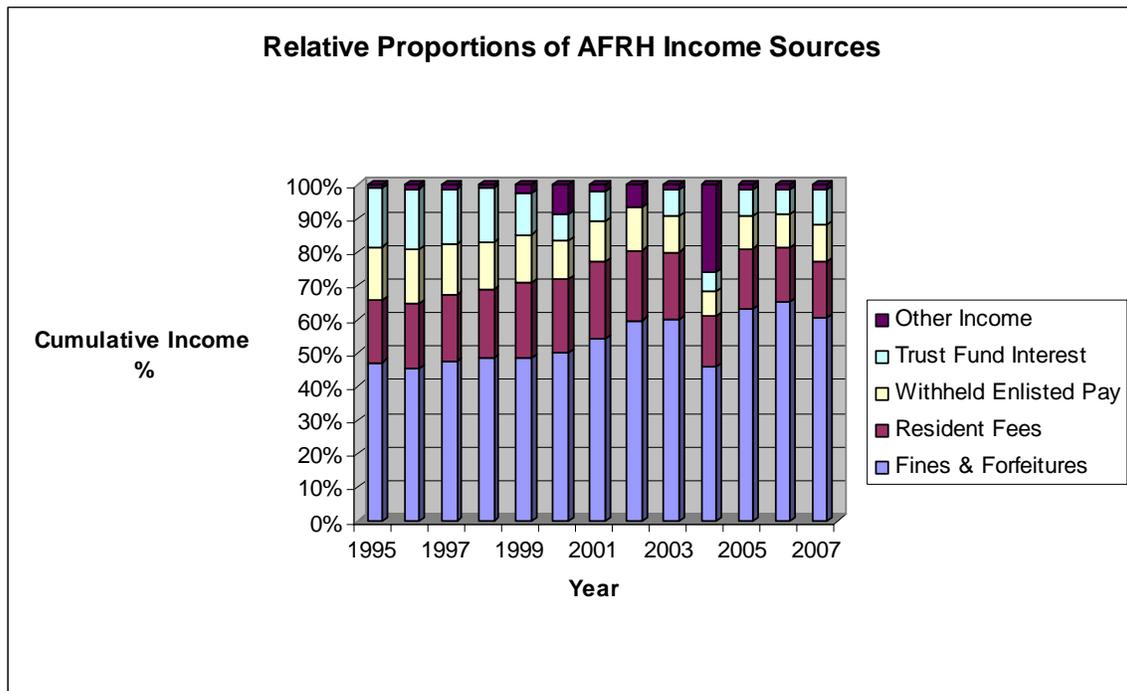
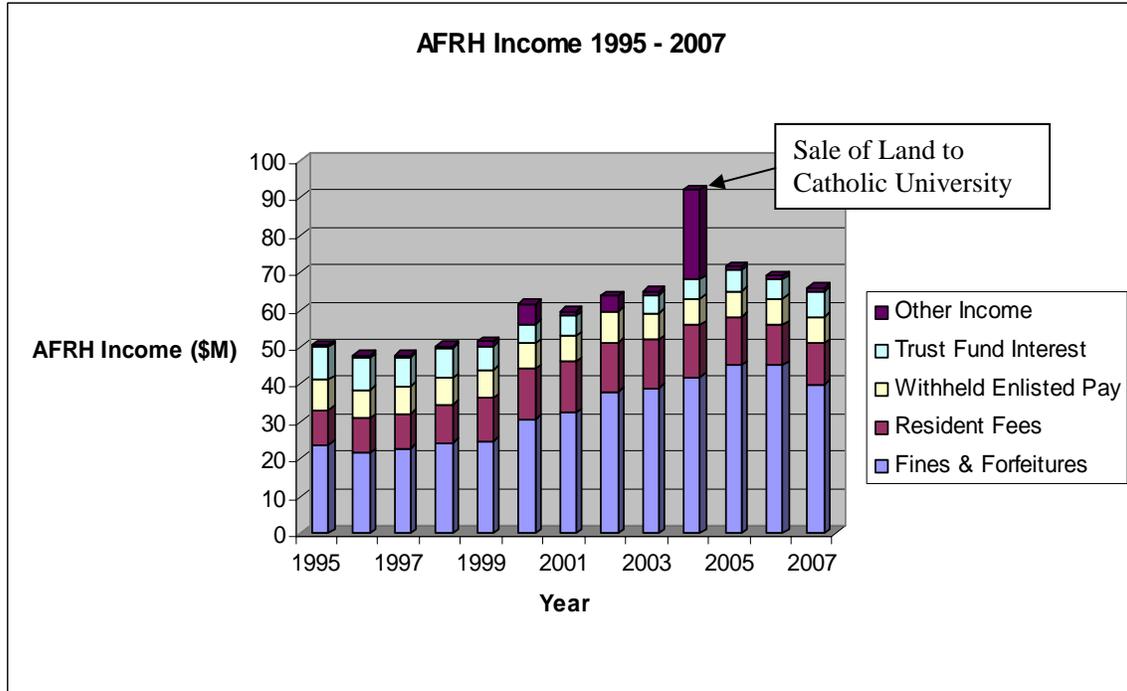
In addition to the structural constraints of its funding sources, in the past AFRH's finances suffered from wasteful spending and inefficient management, circumstances that were exacerbated by the increasing costs of maintaining over 100 buildings on the site. The AFRH Trust Fund fell from \$156 million to \$94 million in the period of 1995 - 2003, as previous administrators spent down the Trust Fund to pay for operational expenses.

This pattern of spending put the institution in jeopardy. To address this problem, Congress passed reform legislation in 2002 that directed the Defense Department to hire professional managers with experience in retirement communities to run the institution and bring costs under control and authorized the sale or lease of assets to generate revenue.

AFRH is currently developing a Master Plan which will guide development of the institution and revenue-generating development for the next 20 years.

INCOME SOURCES

Sources of AFRH funds are described above. Currently, AFRH's largest source of income is the income gained from fines and forfeitures. A summary of income by source for the period 1995-2007 can be seen below.



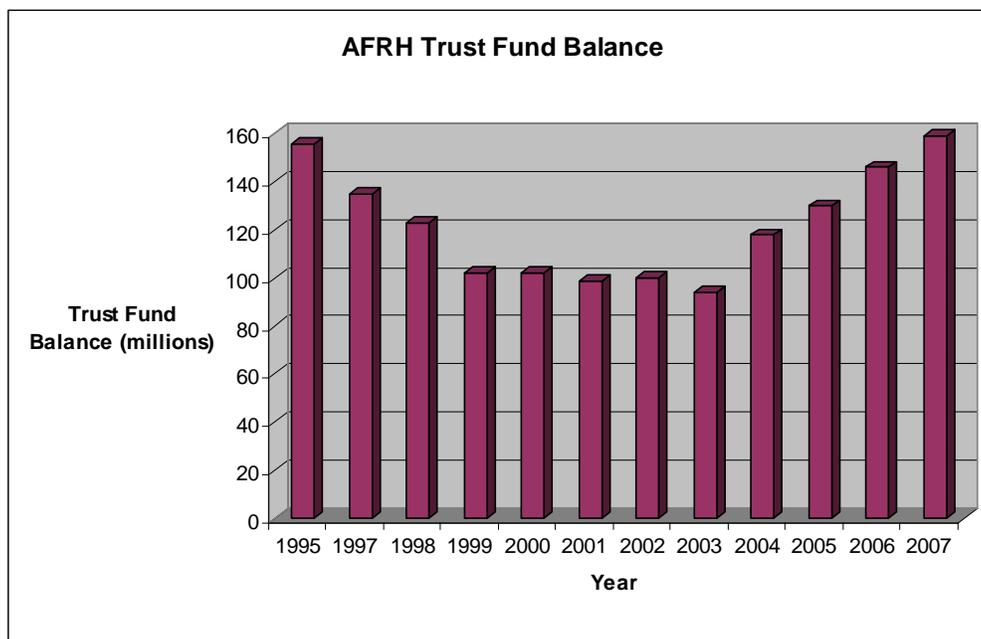
Historically, fines and forfeitures have been approximately 30-40% of AFRH's income. However, for the period 2003 - 2007, due to the wartime increase in military operations, income from fines and forfeitures has averaged over 60% of total income. The chart above shows an increase in the percentage attributable to fines and forfeitures from 45% in 1996 to 65% in 2006. Thus, the largest percentage of AFRH's income is its most variable. Income from fines and forfeitures nearly doubled from 1995 to 2006, from

\$23million to \$45 million, and this is not a sustainable long-term trend. The other three major sources of AFRH's income (50 cent withholding, Trust fund interest, and resident fees) are relatively static, and will not increase significantly over time. (Other income, which is a relatively insignificant percentage of the budget in most years, was greater in 2004 due to the sale of property to The Catholic University of America.)

The instability of AFRH's largest income source and the lack of growth of its other income sources complicate long range financial planning and make it likely that inflation and anticipated increases in operations and maintenance costs for the aging infrastructure will outstrip available revenue sources in the near future. When military operations return to historical average levels, it is likely that AFRH will either operate at a loss or be unable to accumulate additional reserves needed to address required capital expenditures.

AFRH ACTIONS

AFRH has proactively taken many management actions to improve its fiscal situation. Since 2003, the administration reduced the operating budget by cutting staff from 736 to 298, brought both campuses (Washington and Gulfport) under single management, outsourced many non-core services from transportation to security on performance-based contracts, and closed many buildings as it consolidated operations. This has helped to stabilize the Trust Fund, but has not address the long term revenue-generation needs of the institution. In addition, the temporary closure of the Gulfport campus has reduced operating expenses and helped AFRH to rebuild the Trust Fund. However, the largest single reason for the recovery of the Trust Fund has been the surge in fines and forfeitures, which is an unsustainable long-term trend. The Trust Fund balance has returned to 1995 levels only as of 2007 as shown below.



AFRH FINANCIAL NEED

AFRH faces significant financial challenges. In its planning efforts, it has identified two categories of capital needs - 'known' and 'known-unknown' capital needs.

In late 2006, AFRH completed a detailed facilities assessment that identified \$366 million in deferred maintenance and required capital improvements needing funding over the next 10 years. This includes items such as new roofs, new HVAC equipment, and replacement infrastructure. In addition to these specifically identified deferred maintenance and required capital replacement needs, AFRH needs approximately \$5.5 million for a new dementia center. Finally, AFRH will need an increasing amount of operations and maintenance funding to maintain aged infrastructure. Given that the Trust Fund balance stood at approximately \$159 million at the end of FY 2007, this known capital requirement represents a significant challenge.

However, the known capital needs are only a part of the problem. In addition to maintaining its current facilities, AFRH must begin to plan for the next generation of its residents. First, the residents are living longer and becoming more frail and sicker. AFRH needs new facilities in the short-term to cope with the changing health care requirements of its residents. Second, as the current generation of all-volunteer active-duty soldiers reaches retirement age, AFRH anticipates increased demand for housing and specialized services prompting the need for different facilities than the Home currently has. Third, soldiers are returning home with injuries which would have killed them in previous wars and with high levels of Post Traumatic Stress Syndrome. These veterans will require more specialized care and facilities. Thus, AFRH will need to undertake major refurbishments of a number of its facilities to meet the changing future needs of its residents.

AFRH will need significant funds and a reliable income stream to build new facilities to meet the changing needs of future residents and to maintain and modernize its existing facilities. The development of Zones A, B, and C is the mechanism by which AFRH is planning to generate an independent income stream to address its capital needs. Initially, AFRH plans to ground lease Zone A and generate revenue for the Trust Fund. The full development of Zone A is expected to take approximately 12-15 years. At that time, AFRH will have a much firmer picture of the revenue from that development, and will be in a position to determine if development of Zones B and/or C would be required to support AFRH's ongoing capital needs. At this time, in the absence of completed negotiations with its selected developer for Zone A, it is difficult to predict with any reasonable certainty the amount of income that the Zone A development will generate. Even once an agreement is reached, fluctuations in the real estate market will bear on the timing and amount of revenue that may be generated.

AFRH anticipates that the Zone A development will provide income to make substantial progress toward meeting at least its identified near term deferred maintenance and capital needs. Based on comparables, Zone A, developed with the program shown in the Master Plan could generate approximately \$215 million in today's dollars. The transaction is

likely to be structured as a ground lease and AFRH would receive rent over the 60-year term of the lease.

To supplement the Trust Fund and ensure the financial stability of AFRH for future generations of retired military personnel, the National Defense Authorization Act for Fiscal Year 2002 (107 P.L. 107, 24 U.S.C. § 401, et seq.) authorized the Secretary of Defense, to sell or lease AFRH's real estate holdings. AFRH intends to take advantage of the authority provided by this legislation and leverage the value of its real estate by selling or leasing land that is underutilized. AFRH began to implement its financial strategy in 2004 by initiating development studies to determine the best approach for making land available for sale or for development under long-term leases to achieve its financial goals.

The objectives of the AFRH-W Master Plan are to:

- Maximize development of AFRH-W while maintaining the historic character of the site and retaining significant existing open space;
- Provide development uses that are complementary to AFRH-W;
- Ensure that AFRH's facilities are conveniently located for its residents and that there is room for AFRH new facilities on the north campus;
- Provide for the security of the residents of AFRH-W;
- Encourage the rehabilitation and reuse of historic buildings;
- Integrate the landscape and the built form; and
- Where appropriate, respect the character of the adjacent communities and integrate the new development into the city fabric.

4 Alternatives Considered

4.1 Alternatives Studied in Detail (see attached figures)

Alternative 1 – No Action Alternative

Under the No Action Alternative, the action proposed in the EIS would not be taken. AFRH-W would remain under Federal ownership, with AFRH as the holding agency. No new construction would occur on AFRH-W 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 and North Capitol Street restricted to those with business on site. The No Action Alternative does not support the intent of the Armed Forces Retirement Home Act of 1991, as amended (24 U.S.C. §401 et seq.), which allows AFRH

to sell, lease, or otherwise dispose of land determined excess to the needs of AFRH as a means to replenish the AFRH Trust Fund.

Alternative 2

Under Alternative 2 (see Figure 1), AFRH-W would be developed to accommodate a program and density shown in Table 1. This alternative was 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.

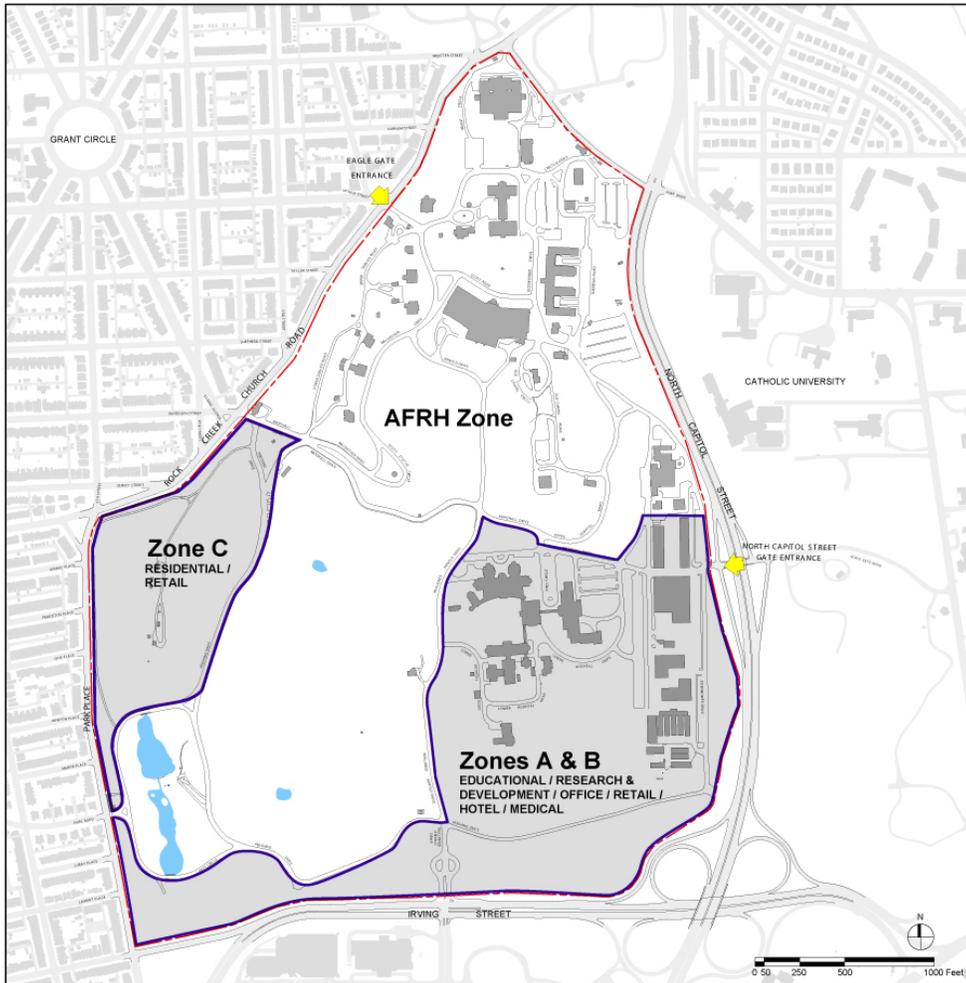


Figure 1: Development Zones - Alternative 2

Table 1: Proposed Development under Alternative 2

Use	Gross Square Footage
Institutional	2,550,000
Residential	992,000
Hotel/Conference Center	200,000
Research & Development	3,200,000
Retail	130,000
Medical	1,600,000
TOTAL	8,672,000

Development zones on AFRH-W would include the following:

- The AFRH Zone is designated for institutional uses and new residential units compatible with AFRH-W operations. There would be moderate infill development within these Zones;
- Zone A1 is designated for educational use including uses compatible with Howard University, Catholic University, and Georgetown University;
- Zones A2 and B would be developed with medical uses compatible with the Children’s Hospital National Medical Center, in addition to the Washington Hospital Center development south of Irving Street;
- Zone B 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; and
- 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.

Alternatives 3A, 3B, and 3C

Under Alternatives 3A, 3B, and 3C (see Figure 2), AFRH-W would be developed to accommodate the program and density shown in Table 2. This alternative was derived from concepts to redevelop portions of the site for mixed use purposes including residential, hotel/conference center, retail, and medical purposes. AFRH has reduced the density of residential development on the western portion of the site from 750,000 gross square feet to 550,000 gross square feet under the Selected Alternative. The gross square footage shown in Alternative 3A incorporates this reduction.

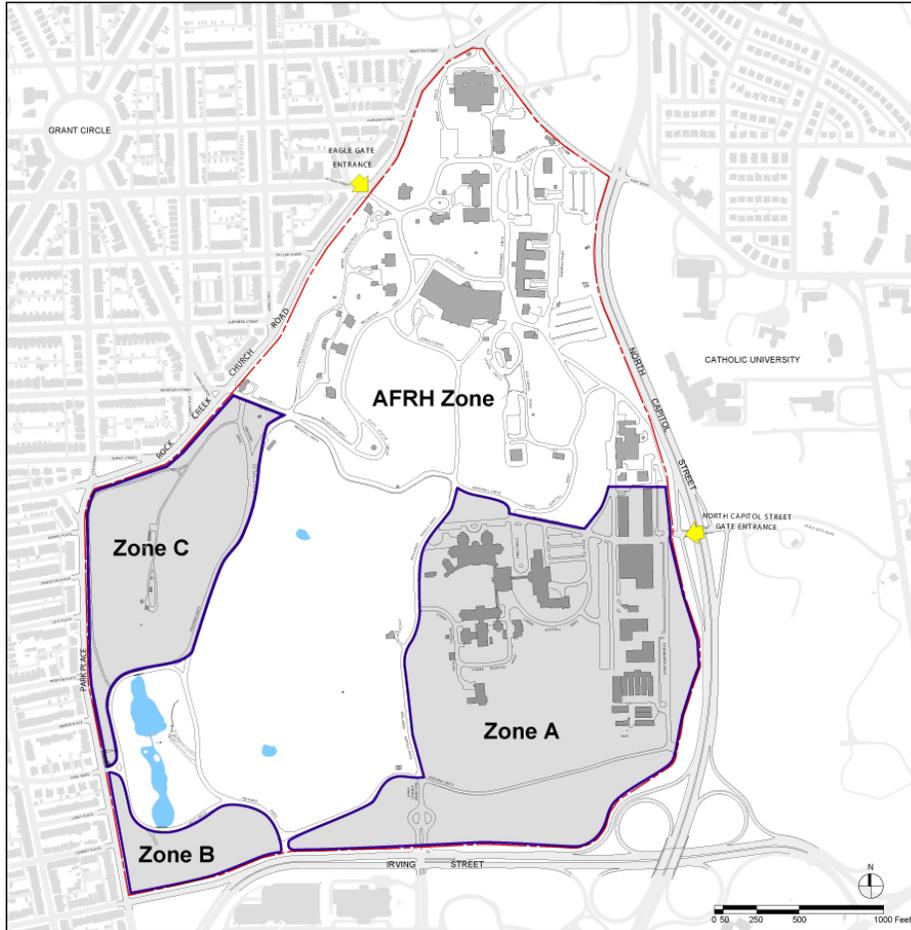


Figure 2: Development Zones Alternatives 3A, 3B, and 3C

Table 2: Proposed Development under Alternatives 3A, 3B, and 3C

Use	Gross Square Footage		
	Alternative 3A (Selected Alternative)	Alternative 3B	Alternative 3C
Institutional	350,000	350,000	350,000
Residential	3,818,234	4,781,819	4,189,331
Hotel/Conference Center	123,026	220,000	200,000
Retail	243,562	241,735	470,763
Medical (including medical office)	240,974	250,000	0
Office/Research and Development	1,383,573	692,000	1,688,600
TOTAL	6,165,369	6,635,554	6,898,694

Note: The values in Table 2 above reflect development densities exclusive of any above ground parking.

Development zones on AFRH-W would include the following:

- The AFRH Zone is designated for institutional uses and new residential units compatible with AFRH-W operations. There would be moderate infill 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 is designated for residential, office/research and development, retail, hotel, and medical uses; and
- Zones B and C are designated for residential development which would take place at a later time.

Alternative 4

Under Alternatives 4 (see Figure 3), AFRH-W would be developed to accommodate the program and density shown in Table 3. This alternative was derived from the concept of developing the site to accommodate institution, residential, retail and office space without the hotel/conference and medical space included in Alternatives 2, 3A, 3B, and 3C.



Figure 3: Development Zones – Alternative 4

Table 3: Proposed Development under Alternative 4

Use	Gross Square Footage
Institutional	350,000
Residential	4,967,000
Retail	300,000
Office	700,000
TOTAL	6,317,000

Development zones on AFRH-W would include the following:

- The AFRH Zone is designated for institutional uses and new residential units compatible with AFRH-W operations. There would be moderate infill development within this Zone;
- Zones A and B would be developed with residential, office, and retail uses; and
- Zone C would contain residential development compatible with the residential development west of Rock Creek Church Road.

4.2 Alternatives Considered but Dismissed from Further Study

As discussed previously, AFRH has focused on the land development option for a number of reasons. These include the magnitude of the immediate and projected future capital needs, the direction from Congress and Department of Defense to manage its trust fund and to be self-sufficient, the unlikelihood of obtaining appropriations, and the absence of legislation that would allow AFRH to seek higher returns on its Trust Fund monies. However, several additional alternatives were assessed to determine whether they were feasible and whether they would meet the project's purpose and need and objectives. Alternatives that were considered in response to suggestions from stakeholders and were not included for further study are described below.

Seek Congressional Appropriations – AFRH-W does not receive direct Congressional appropriations and has been directed by Congress and the Department of Defense to manage its Trust Fund and operate as a self-sufficient, non-appropriated agency. AFRH received appropriated funds for the rebuilding of its Gulfport campus, but those funds were specifically earmarked for that purpose. It is highly unlikely that AFRH will become an appropriated agency, especially given the magnitude of funding required for its capital program, existing budget deficits, and current military spending priorities. In addition, 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. Even if AFRH were to receive additional funding, a Master Plan would still be needed to guide development on AFRH-W. For these reasons, AFRH's need is

best met by considering the land development alternatives and developing a Master Plan for AFRH-W.

None of the other alternatives suggested below would generate sufficient revenue for AFRH-W's needs. AFRH-W has deferred maintenance needs of over \$366 million, the need for a new dementia unit costing over \$5 million, and as yet unquantifiable needs to meet housing and healthcare requirements of veterans of Gulf Wars I and II who may reside at AFRH-W, and the veterans from Iraq and Afghanistan wars with brain trauma, multiple amputations, and historically high levels of post traumatic stress disorder, and their related special housing and health care needs.

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 under several alternatives discussed above. However, these would be located outside of the secured AFRH Zone. As well, this concept would not generate the revenue needed. Additional land use development is necessary in order to provide sufficient revenue to support AFRH's goal of resident-focused care while replenishing 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.

5 Public Involvement

5.1 Scoping

In accordance with NEPA, a scoping process was conducted. The CEQ Regulations define scoping as an early and open process for determining the scope of the issues to be addressed and for identifying the significant issues related to the proposed action (40 CFR 1501.7). Scoping is usually the first direct contact between proponents of a proposed action and the public. Scoping has the following objectives:

- To identify the affected public or agency concerns;
- To facilitate an efficient environmental document preparation process through assembling cooperating agencies, assigning data collection and analysis tasks, and scheduling appropriate reviews;

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- To define the issues and alternatives that will be examined in detail in the environmental document while simultaneously devoting less attention and time to issues which cause no concern; and
- To save time in the overall process by helping to ensure that the environmental document adequately addresses relevant issues.

As part of the scoping process, AFRH sent letters to various Federal and local officials, community groups, special interest groups, area residents, and AFRH-W residents. These individuals were asked to express any concerns, issues, or alternatives they would like to see addressed as part of this analysis.

In addition, AFRH held Scoping Meetings on Thursday, September 9, 2004, from 3:30 to 5:30 p.m. for residents of AFRH-W and from 6:30 to 8:30 p.m. for residents and the public. Approximately 53 people attended the meetings. Poster boards were displayed showing the project location; draft Master Plan concept; a history of AFRH; the EIS process; the Section 106 process; and environmental features to be addressed in the EIS. Project team members were available to explain the proposed project and to answer questions. An informational brochure on the project was provided to the meeting attendees. A PowerPoint presentation was also shown, providing details on the Master Plan and the NEPA and Section 106 processes. Comment forms were available for attendees to complete. Tape recorders were also available for those who wished to record audio comments rather than submit written comments.

5.2 Draft EIS Public Comment Period and Public Hearing

The Draft EIS on AFRH Master Plan was issued on May 20, 2005. The public comment period extended from the date of issuance through July 5, 2005. A Public Hearing to present the findings of the EIS and solicit comments on the document was held on June 22, 2005 at AFRH-W. AFRH presented the Master Plan Alternatives 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 EIS. Thirty-three (33) citizens spoke at the Public Hearing. The proceedings of the meeting, including oral comments, were recorded by a stenographer. The transcript of the public hearing is located in Appendix C of the Final EIS.

In addition, written comments were received from 67 federal and local agencies, community organizations, and individual citizens.

5.3 Final EIS, 30-Day Public Review

The Notice of Availability for the Final EIS for this proposed action was published in the Federal Register on November 9, 2007, opening a 30-day public review period ending December 10, 2007. Copies of the Final EIS were sent to 126 agencies, organizations, and individuals. The Final EIS was made available at two libraries and at AFRH-W.

AFRH received comments on the Final EIS from three agencies and one organization. The comments focused on concerns about meeting resident needs, reuse of existing

buildings, minimization of impacts to historic buildings and landscapes, stormwater impacts, and transportation impacts. All comments were considered in deciding on the Selected Alternative.

5.4 Additional Community Involvement

Following issuance of the Draft EIS, AFRH held a series of meetings with a planning committee and with community members in anticipation of the RFQ for the mixed use redevelopment in Zone A (formerly Zones 3 and 4).

5.4.1 Planning Committee

The Planning Committee for Zone A was comprised of representatives from community associations and Advisory Neighborhood Commissions, the National Capital Planning Commission, the DC Office of Planning, the Urban Land Institute, neighbors including the Washington Hospital Center and Catholic University, and AFRH residents. AFRH held its first meeting with AFRH planning committee on October 5, 2005 from 4:30 p.m. to 7:00 p.m. at AFRH-W. A PowerPoint presentation was given to planning committee community representatives, which consisted of residents, institution representatives, and members of the community. The meeting was tape recorded and the recordings were used to make a transcript of the proceedings. Participants were provided with a background on AFRH as well as an explanation of the importance of the Trust Fund to the residents and the need for development. The purpose of the meeting was to inform the community about the Master Plan and to get feedback on the outcome of the Master Plan and to provide community members the opportunity to comment on proposed development and to ask questions about the Master Plan process.

On October 19, 2005, Planning Committee Meeting No. 2 was held at AFRH-W. Planning committee participants had an in depth discussion regarding meeting the guidelines of the Master Plan. The primary focus was on issues such as the use of open spaces, building heights, and parking structures in Zone A (formerly Zones 3 and 4).

Key issues of concern discussed during the meeting included:

- Site access and security issues;
- Possible tradeoffs between open spaces and building heights;
- Maintaining vistas of the Washington Monument and US Capitol from the site;
- Preserving the character of the site by requiring that developers disturb the site as little as possible; and
- Through traffic possibly adversely affecting community feel.

Planning Committee Meeting No. 3 was held at AFRH on November 3, 2005 from 4:30 to 6:30 p.m. The committee discussed some of the different options and concerns for the proposed development in each zone. Planning Committee Meeting No. 4, held December 7, 2005, walked through the draft Master Plan and further discussed the development options being considered.

Concerns addressed in the meetings included:

- Preservation of historical sites;
- Retaining open spaces;
- Security issues; and
- Public access areas.

5.4.2 Community Master Plan Meetings

The first community meeting was held October 22, 2005, at 3:05 p.m. at St. Paul's Rock Creek Parish on Rock Creek Church Road. Approximately 39 people attended the meeting. Members of the Planning committee explained the history and historic significance of AFRH site and elucidated the need for site redevelopment. Several members of the community expressed concerns regarding the transparency of the process including selection of planning committee representatives and difficulties in navigating AFRH website. The community also voiced concerns about how traffic will be affected, whether there will be adequate open space and accessibility once the site is redeveloped, and when and how the redevelopment process will proceed.

On October 24, 2005, a second community meeting was held at St. Gabriel's Church on Webster Street. About 51 members of the community attended the meeting. Many expressed concern about potential site uses, site access, and whether new residential areas would include affordable housing. Others were concerned about the criteria used for choosing the planning committee members. Some were not feeling that the process was an open one. There were concerns about how many comments would actually be considered since AFRH already had an idea of the amount of development needed to meet its goal. Still others wanted to leave as much land as possible untouched to preserve the historic portions of the site.

The third community meeting was held at 7 p.m., November 3, 2005, at the Sweet Mango Café on New Hampshire Avenue. In attendance were approximately 61 members of the community. Several people voiced concerns about the availability of affordable housing, how existing housing costs would be affected, and how the proposed development would affect property value. Others wanted parkland set aside and wanted public access to the lakes. There were also concerns about traffic and how potential congestion could be mitigated.

AFRH gave presentations to United Neighborhood Coalition (UNIC) on April 4, 2007; to ANC 4 on April 10, 2007; to the Federation of Citizens Associations of DC on April 24, 2007; and to ANCIA Planning and Zoning Committee on May 21, 2007. The presentations covered the background of AFRH, project history, the proposed development for Zone A, project status and updates, project time line, and any questions on presented material.

Issues identified at the community meetings were used as input in preparing the final Master Plan and led to such outcomes as a preferred alternative at the lowest scale of development, guidelines to protect views, provide openings in the historic fence for pedestrians from the adjacent neighborhood and the inclusion of open spaces accessible to the public and buffers on the perimeter. With regard to the planning process, AFRH established a number of ways of providing community input including through meetings open to the general public that were widely advertised, participation at meetings regularly held by organizations and ANCs, an open house and site tours, and the Section 106 process.

5.4.3 Coordination with Agencies, Organizations, and Affected Persons

Coordination with Federal and local agencies, community groups, and other interested parties has been conducted throughout the preparation of this Final EIS. As part of the EIS scoping period, AFRH coordinated with the National Capital Planning Commission, National Park Service, the Advisory Council on Historic Preservation, the Department of Defense, the Environmental Protection Agency, FEMA, and the Federal Highway Administration. Local agencies with which coordination has occurred include the DC Mayor and Council, DC Historic Preservation Office, the DC Office of Planning, District Department of Transportation, and the DC Department of Consumer and Regulatory Affairs, and the DC Department of Public Works. Other organizations with whom AFRH has coordinated include the National Trust for Historic Preservation, Medstar/Washington Hospital Center, Catholic University, Advisory Neighborhood Commissions, various neighborhood civic associations, the DC Preservation League, National Capital Revitalization Corporation, several veteran organizations, and the United Armed Forces Association. Coordination has also taken place with the Washington Metropolitan Transportation Authority and the Metropolitan Washington Council of Governments.

6 Environmentally Preferable Alternative

The Council on Environmental Quality (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 EIS, Table 5 shows the preferable alternative(s) for each of the resources considered.

Table 5 Environmentally Preferable Alternative(s) by Resource Area

	No Action Alternative	Alternative 2	Alternative 3A	Alternative 3B	Alternative 3C	Alternative 4
Natural Resources	√					
Social Environment			√			
Cultural Resources	√					
Transportation	√					
Air Quality	√					
Noise	√					
Utilities	√					
Environmental Contamination		√	√	√	√	√

7 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 Natural Resources

- Direct, long-term, moderate, adverse impacts to topography and soils would occur from clearing, grading, and construction activities.
- No direct impacts to water resources would occur. Increases in impervious surfaces would have indirect, long-term, moderate, adverse impacts on water quality. Channelized streams on AFRH-W may need to be relocated resulting in a direct, long-term, minor, adverse impact. Installation of new stormwater management controls would result in an improvement in stormwater quantity and quality leaving the site. An indirect, long-term, minor, adverse impact on the quality of stormwater runoff would occur.
- Implementation of the Selected Alternative could require removal of mature trees and construction within open space/meadows resulting in a direct, long-term, moderate, adverse impact on terrestrial biota. Increases in impervious surfaces would have indirect, long-term, minor, adverse impacts on aquatic biota.

Impacts on Social Environment

- The Selected Alternative would add 3,818,234 gsf of new residential space housing approximately 6,000 residents and resulting in a direct, long-term, moderate, beneficial impact to the local housing stock and population. Affordable housing will be part of the residential program.
- Low income and minority populations would not be disproportionately affected by impacts of the Selected Alternative.
- Additional residential development would require increased services from the DC Public Schools resulting in a direct, long-term, minor, adverse impact. All new development would require emergency services from the DC Metropolitan Police Department and the DC Fire Department resulting in a direct, long-term, minor, adverse impact. There would also be a beneficial impact on Fire Protection due to the new and renovated up-to-code buildings as well as new fire protection devices on site. Community services such as libraries, social services organizations, community organizations, and churches would likely benefit from the increase in tax base and local population. The number of mail carriers may increase depending on the number of cluster boxes on the site. Therefore, impacts to the U.S. Postal Service are expected to be direct, long-term, minor, and adverse. Under the Selected Alternative, there will be direct, long-term, major beneficial impacts to the public through the creation of publicly accessible bicycle paths, pedestrian paths, two pocket parks, two large open meadows, and a green buffer around the entire perimeter of Zone A.
- The proposed development would be consistent with the Federal and DC Elements of the *Comprehensive Plan for the National Capital*. In some areas, the Selected Alternative would result in a change in land use from open space to residential and commercial development resulting in a direct, long-term, major adverse impact. In addition, the Selected Alternative would act as a catalyst for future development in the area and would have an indirect, long-term, minor, beneficial impact.
- Construction would have a direct, short-term, minor, beneficial impact from the employment of construction workers and expenditures for construction materials. There will be significant opportunities for small and disadvantaged business enterprises (SDBEs) and opportunities for apprenticeships in the construction trades. Long-term, moderate, beneficial impacts would occur from expenditures by new businesses and employees occupying the new development. In addition, a direct, long-term, minor, beneficial impact from the creation of jobs would occur.
- Implementation of the Selected Alternative would have a long-term, major, beneficial impact on AFRH Trust Fund revenues.
- There would be a moderate, long-term, beneficial impact to the District of Columbia from tax revenues on private development on AFRH-W.

Impacts on Cultural Resources

- There could be a direct, long-term, minor to moderate adverse impact on archeological resources from the implementation of the Selected Alternative.
- The Selected Alternatives could change the settings and views of, and therefore have indirect, long-term, moderate adverse impacts to, resources listed on or eligible for listing in the National Register of Historic Places.
- The Selected Alternative could have direct, long-term, major, adverse impacts to the historic cultural landscape on AFRH-W.
- Reuse of historic buildings could have a direct, long-term, moderate beneficial impact.
- A direct, long-term, major adverse impact on the historic district would occur.

Impacts on Transportation

- The Selected Alternative would result in a direct, long-term, major adverse impact on traffic levels in the area. Intersections at North Capitol Street/Michigan Avenue, North Capitol Street/Harewood Road, and Irving Street/1st Street/ Site Access would fail under Alternative 2. Intersections at North Capitol Street/Harewood Road and Irving Street/1st Street/Site Access would fail under Alternatives 3A/3B and 4.

Impacts on Air Quality

- Construction activities would result in short-term, minor, adverse impacts to air quality.
- Traffic increases would result in direct, long-term, minor, adverse impacts to air quality. Stationery sources would result in direct, long-term, major, adverse impacts to regional air quality.

Impacts on Noise

- Construction activities would result in direct, short-term, moderate, adverse impacts to noise levels.
- Traffic increases would result in a direct, long-term, negligible, adverse affect on noise levels.

Impacts on Utilities

- Direct, long-term, minor, adverse impacts on utility capacity would occur. Solid and medical/lab waste would be handled in accordance with appropriate regulations.

Impacts on Environmental Contamination

- The removal of hazardous waste and contaminants in the buildings on the site would have a direct, long-term, minor, beneficial impact.

8 Mitigation Measures Related to the Selected Alternative

8.1 Mitigation Measures to be Undertaken

Potential mitigation measures were identified and recommended in the Final EIS to address the variety of short-term and long-term impacts resulting from the Selected Alternative. With respect to the selected alternative, Table 6 details the mitigation commitments that AFRH (for the AFRH Zone) and/or developers of Zones A, B, and C will implement.

Table 6: Mitigation Measures to be Undertaken

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
Geology, Topography, and Soils	<p>Soil suitability will be determined and appropriate building foundation specifications will be developed.</p> <p>A detailed erosion and sedimentation control plan will be developed prior to construction, based on the requirements of the Watershed Protection Division of the DC Department of Environment.</p>			
Water Resources	<p>A detailed erosion and sedimentation control plan will be developed prior to construction, based on the requirements of the Watershed Protection Division of the DC Department of Environment.</p> <p>The amount of mowed lawns will be minimized and integrated pest management techniques will be used during landscaping and turf maintenance practices to reduce the potential for altering groundwater quality.</p> <p>On-site stormwater management controls will be provided to limit the amount of storm runoff leaving the site during a storm event and to reduce the amount of contaminants in that runoff. Stormwater quantity and quality management practices will ensure no increase in post-development runoff peak flow and will mitigate the impacts of increased stormwater runoff on the combined sewer system. At a minimum, new development will meet the requirements of the DC Department of Environment regulations.</p> <p>Best Management Practices (BMPs) will be utilized to mitigate indirect and cumulative impacts to wetlands</p>			

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	<p>associated with the proposed action. Development in wetland areas is regulated by the USACE pursuant to the Clean Water Act (as implemented by 33 CFR 320-329, March 28, 2000, and 33 CFR 330, March 28, 2000). 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>			
Biological Resources	<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>			
Archeological Resources	<p>Specific Phase 1 archaeological assessments and surveys, as required by the Guidelines for Archaeological in the District of Columbia and recommended by the AFRH-W Phase 1A archaeological study prepared by Greenhorne and O'Mara, will be conducted in defined areas of Limits of Disturbance (LODs) associated with the development locations</p>	<p>Specific Phase 1 archaeological assessments and surveys, as required by the Guidelines for Archaeological in the District of Columbia and recommended by the AFRH-W Phase 1A archaeological study prepared by Greenhorne and O'Mara, will be conducted in defined areas of Limits of Disturbance (LODs) associated with the development locations</p>	<p>Specific Phase 1 archaeological assessments and surveys, as required by the Guidelines for Archaeological in the District of Columbia and recommended by the AFRH-W Phase 1A archaeological study prepared by Greenhorne and O'Mara, 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</p>	<p>Specific Phase 1 archaeological assessments and surveys, as required by the Guidelines for Archaeological in the District of Columbia and recommended by the AFRH-W Phase 1A archaeological study prepared by Greenhorne and O'Mara, 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</p>

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	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.	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.	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.	structures. These investigations should be conducted well in advance of the ground disturbance to avoid conflict with development schedules.
Historic Properties	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	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"> • Barnes Building 	As a condition of development for Zone B, the selected developer will be required to complete the following, but not limited to, specific mitigations: <ol style="list-style-type: none"> 1) Restoration of historic iron fence along the western perimeter of Zone B. 2) Developer will 	As a condition of development for Zone C, the selected developer will be required to complete the following, but not limited to, specific mitigations: <ol style="list-style-type: none"> 1) Restoration of the historic iron and masonry and iron fences along the western perimeter of Zone C. 2) Relocation of Community Gardens from Zone C to

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	<p>of NCPC’s approval of the AFRH-W MP.</p> <p>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 relocated.</p> <p>3) AFRH will develop and implement a Historic Preservation Maintenance Program (HPMP) designed to identify and prioritize the maintenance needs of</p>	<p>(Building 52)</p> <ul style="list-style-type: none"> • Forwood Building (Building 55) • King Hall (Building 59) • Viewing Stand (Building 50) • Bandstand (Building 49) • Mess Hall (Building 57) • Mess Hall Corridor (Building 58) • Hostess House (Building 53) • Quarters 47 (Building 47) <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</p>	<p>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>AFRH Zone. Potential relocation sites will be identified as part of the Landscape Master Plan to be developed by AFRH.</p> <p>3) Undertake specific landscaping to screen Quarters 90 (Randolph Street Gatehouse, Building 90) from the northernmost development on Zone C.</p> <p>4) Developer 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>

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	<p>the contributing historic (built, natural and designed landscape, and archeological) resources. This plan will be developed and implemented within two (2) years of NCPC’s approval of the AFRH-W MP. Copies will be provided to Parties and Consulting parties upon written request after its completion.</p> <p>4) AFRH will integrate the AFRH-W Resource Inventory/Cultural Resource Management Database into the Home’s proposed Computerized Maintenance Management System</p>	<p>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"> • Forwood Building Grounds to the extent grounds are located in Zone A and controlled by developer. (The LaGarde building and secured grounds remaining within the AFRH Zone are excluded until such 		

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	<p>(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 NCPC's approval of the AFRH-W MP.</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</p>	<p>time as the LaGarde building is leased to the developer);</p> <ul style="list-style-type: none"> • 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 allee 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 allee; • Hospital Complex Quadrangle to the extent grounds are located in Zone A and controlled by developer. (LaGarde 		

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	<p>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.</p> <p>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</p>	<p>and secured grounds remaining within the AFRH Zone are excluded until such time LaGarde is leased to the developer);</p> <ul style="list-style-type: none"> • 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 • Pasture Recreation: Developer will preserve to the maximum extent possible the orientation, unaltered topography, and configuration of the Historic Pasture in Zone A. Also, 		

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	<p>defined in the AFHR Programmatic Agreement for review and comment during its development.</p> <p>7) AFRH will complete specific landscape projects as follows:</p> <p style="padding-left: 40px;">a. The Scott/Sheridan Promenade Project will be completed within three (3) years of NCPC's approval of the AFRH-W MP,</p> <p style="padding-left: 40px;">b. The Scott Building Tree Planting Program will be completed as part of the landscape</p>	<p>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.</p> <p>3) The developer will devise and implement an educational interpretation program, including signage focusing on the history of AFRH and AFRH-W in accordance with the Development Agreement with AFRH for Zone A.</p> <p>4) The Developer will complete a tree-</p>		

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	<p>master plan developed in item #5 above</p> <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.</p> <p>9) AFRH will comply with height limits and screening guidance in the Master Plan to protect viewsheds as identified in the HPP</p>	<p>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 MP, as approved by NCPC.</p>		

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	and AFRH-W MP, as approved by NCPC.			
Transportation	As part of any development agreement, AFRH-W will require developers to prepare a transportation management plans detailing strategies to reduce single occupancy vehicle use, such as shuttles to public transportation and incentives for carpools/vanpools.	<p>The following measures will be undertaken by the developer, subject to the reviewing agencies having jurisdiction, as part of the development of Zone A:</p> <ul style="list-style-type: none"> • Provide a new right-in/right-out only access onto westbound Irving Street, NW between the Irving Street/North Capital Street interchange and 1st Street, NW • Provide a full-movement intersection at onto Irving Street at 1st Street, NW • Provide a new full-movement access midway between Kenyon Street, NW 	<p>The following measures will be undertaken by the developer, subject to the reviewing agencies having jurisdiction, as part of the development of Zone B:</p> <ul style="list-style-type: none"> • A new entrance will be constructed from Zone B onto Irving Street. • Construct sidewalks and bike paths to facilitate public access. <p>The developer of Zone B will prepare a transportation management plan detailing strategies to reduce single occupancy vehicle use, such as shuttles to public transportation and incentives for carpools/vanpools.</p>	<p>The following measures will be undertaken by the developer, subject to the reviewing agencies having jurisdiction, as part of the development of Zone C:</p> <ul style="list-style-type: none"> • Re-open the entrance from AFRH-W to Randolph Street, NW. • Construct sidewalks and bike paths to facilitate public access. <p>The developer of Zone C will prepare a transportation management plan detailing strategies to reduce single occupancy vehicle use, such as shuttles to public transportation and incentives for carpools/vanpools.</p>

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
		<p>and 1st Street, NW</p> <ul style="list-style-type: none"> • Reopen the existing gate onto North Capital Street • Construct a sidewalk on the north side of Irving Street, NW between the new entrance to Zone A at First Street and Park Place. <p>The developer of Zone A will implement the approved transportation management plan to reduce single occupancy vehicle use such as shuttles to public transportation and incentives for carpools/vanpools.</p>		
Open Space	The AFRH Master Plan designates open space that will be created and/or preserved for enjoyment of residents of	The AFRH Master Plan designates open space that will be created and/or preserved in Zone A and will be open to the	The AFRH Master Plan designates open space that will be created and/or preserved in Zone B and will be open to the public	The AFRH Master Plan designates open space that will be created and/or preserved in Zone C and will be open to the public

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	the Home.	public.		
Air Quality	Short term construction impacts will be mitigated through the use of proper control measures including maintenance of emission controls on all construction equipment and covering/wetting exposed soils to reduce fugitive dust. Developers and construction contractors will be required to submit a construction management plan including plans to control impacts to air quality during construction.			
Noise	<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> <ul style="list-style-type: none"> • All construction equipment powered by an internal combustion engine will be equipped with a properly maintained muffler; • Air compressors will meet current U.S. EPA noise emission standards; • New construction equipment will be used as much as possible since it is generally quieter than older equipment; • Nighttime construction activities will be minimized; • Portable noise barriers within the equipment area and around stationary noise sources will be established; and • Tools and equipment will be selected to minimize noise. 			
Utilities	<p>Impacts to utilities will be minimized through the following:</p> <ul style="list-style-type: none"> • Preparation of a water conservation plan and policy; • Installation of faucet aerators and low-flow toilets and shower heads in new construction; • Design of landscape plans for minimum water use (e.g., plant native, drought-tolerant species); • Minimization of lawns because of their high water consumption (and energy consumption and air emissions from mowers); 			

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
	<ul style="list-style-type: none"> • 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); • Incorporation of energy conservation measures into new building design to mitigate impacts related to power systems; • Recycling of construction related debris; • Implementation of office recycling programs in government spaces in accordance with Executive Order 13101: Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition; and • 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 (Chapter 20, Title 21 § 2000 et. Seq.). 			
Environmental Contamination & Remediation	<p>All hazardous materials, such as lead-based paint and asbestos-containing materials, will be properly remediated prior to demolition of buildings or building renovations.</p>	<p>For Zone A, the developer will carry out remediation on behalf of AFRH.</p> <p>The oil-water separator at Building 76 will be removed if it is no longer needed.</p> <p>Existing operational UST systems at Buildings 52, 56, and 64 will be tightness tested to confirm that there are no current leaks. Inactive UST systems at Buildings 46 and 75 will</p>	<p>All hazardous materials such as lead-based paint and asbestos-containing materials will be properly remediated prior to demolition of buildings or building renovations.</p>	<p>All hazardous materials such as lead-based paint and asbestos-containing materials will be properly remediated prior to demolition of buildings or building renovations.</p>

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
		<p>be removed and properly closed. Additional subsurface sampling will be completed at Buildings 26/27 and 74A, to evaluate the presence/absence of petroleum hydrocarbons in soil, where no closure data exists. Closure documentation will be obtained and reviewed for the two tanks listed with an “undocumented closure” status (i.e., Building 26/27 and Building 74/74A). If the tanks are present, they will be abandoned in accordance with D.C. Department of the Environment and City regulations.</p> <p>The ash waste material located inside of the incinerator at Building 69 will be removed by a qualified contractor, and</p>		

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
		<p>transported and disposed of off-site as a lead characteristic hazardous waste.</p> <p>The following items were recommended in the Phase II ESA as part of AFRH-W due diligence and will be conducted by the developer on behalf of AFRH:</p> <ul style="list-style-type: none"> • Additional assessment at Building 46 to delineate the lateral and vertical extent of naphthalene, PCE, TCE and related drycleaning solvents and to establish the actual source area. An active or passive soil-gas survey will be performed as the initial investigative task for this assessment, prior to additional soil and 		

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
		<p>ground-water sampling.</p> <ul style="list-style-type: none"> • Wipe samples will be collected on the concrete floor in the Building 77 Pesticides Storage Room to confirm the presence/absence of pesticides and herbicides, if future occupancy or demolition is proposed. • Additional subsurface soil sampling will be conducted in the area of the hydraulic lifts at Building 76, to delineate the lateral and vertical extent of petroleum impact. Petroleum contaminated soils that are removed from the ground at Building 76 or at other buildings at 		

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
		<p>AFRH-W that cannot be used on site as approved fill (typically with a TPH less than 100 mg/kg), must be remediated or transported off site for treatment/disposal at a properly permitted facility.</p> <p>Although no further assessment is recommended at Buildings 48 and 78 (since the levels of detected pesticides were less than RBCs), if greenhouses/ structures at these sites are demolished, the interior soil will need to be characterized prior to disposal.</p>		
Socio-Economic		<p>1. The developer of Zone A will provide opportunities for SDBEs and</p>	<p>1. The developer of Zone B will provide opportunities for SDBEs and apprentices</p>	<p>1. The developer of Zone C will provide opportunities for SDBEs and apprentices in any</p>

	AFRH	Zone A Developer	Zone B Developer	Zone C Developer
		<p>apprentices in accordance with the terms of the development agreement with AFRH.</p> <p>The developer of Zone A will provide affordable housing as part of the development program in accordance with the terms of the development agreement with AFRH.</p>	<p>in any development of Zone B.</p> <p>2. The developer of Zone B will provide affordable housing as part of any residential development program in this zone.</p>	<p>development of Zone C.</p> <p>2. The developer of Zone C will provide affordable housing as part of any residential development program in this zone.</p>

8.2 Mitigation Measures Outside the Jurisdiction of AFRH

The mitigation measures described below are outside the jurisdiction of AFRH, and hence are not being undertaken by AFRH, but would improve the traffic in the vicinity of AFRH-W:

Based on analysis in the EIS, the following transportation improvements are needed under the No Action Alternative and are not a result of the proposed action.

North Capitol Street/Michigan Street

- Construct dedicated right turn lanes on all approaches and construct an additional westbound left turn lane on the westbound Michigan Avenue approach

Irving Street/1st Street NW

- On the northbound approach, provide one shared left and right turn lane, and two exclusive right turn lanes

North Capitol Street/Fort Drive

On the westbound approach, provide one shared left and right turn lane, and one exclusive right turn lanes

9 Unavoidable Adverse Impacts

Some of the Master Planning activities are projected to result in disturbances such as noise, air emissions, occasional traffic congestion within areas not previously or recently subject to these effects. To the extent possible, mitigation and management measures, such as those identified above and in Section 4 of the EIS would be applied to reduce potential effects to acceptable levels. However, some impacts that cannot be mitigated would occur. These impacts, while not likely to be significant to environmental resources, could be considered significant or annoying to individuals potentially affected.

Potential impacts that could occur that could not be mitigated include the following:

- The commitment of land for construction of new buildings within AFRH. The total commitment would include the loss of open space; removal of mature trees, and the permanent changes to the historic cultural landscape currently present at the site. The loss of some of these resources would be permanent although trees will be replaced.
- A commitment of fuel and energy would be required to construct new buildings. Other resource commitments during the construction period would include construction materials and labor. There would be an additional long-term commitment of labor for the maintenance of buildings and infrastructure.

In addition, once new buildings are in place, there is a commitment of utilities, fuel, and power. All of these resources relating to the construction and maintenance of the facility and its infrastructure should be considered irretrievably committed.

10 Record of Decision Approval

Based on the analysis and evaluation contained in the Final EIS, 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:

- 1) Implement Alternative 3A for the creation of a master plan for AFRH-W that will sustain the AFRH and its primary source of funding, the AFRH Trust Fund.



February 26, 2008

Timothy C. Cox
Chief Operating Officer
Armed Forces Retirement Home

Date