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8 RESPONSES TO COMMENTS

The Draft Environmental Impact Statement (EIS) on the Armed Forces Retirement Home (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.

In addition, written comments were received from 67 federal and local agencies, community organizations, and individual citizens. Thirty-three (33) citizens spoke at the Public Hearing. Comments received at the Public Hearing were recorded by a stenographer.

Responses to substantive comments are addressed in the following section. Copies of written comments, along with a copy of the Public Hearing transcript, are included in Appendix C.

Comment Number	EIS Section Number	Commenter	Comment	Response
1.	General	AFRH Home Master Plan Committee	Chapter 1, page 1-9, 1.9.1, Impact on Security and Safety of Residents The issue of maintaining the security and safety of the AFRH-W resident community pre-construction, construction and post construction is not discussed within the current draft of the	The Master Plan will include a new secured perimeter that will maintain the security of AFRH-W operations for its residents. Development Zones A, B, and C (formerly Zones 3, 4, 5, and 6) would be open to the public.

Comment Number	EIS Section Number	Commenter	Comment	Response
			EIS. Question: how will this issue be addressed and/or mitigated?	
2.	General	AFRH Home Master Plan Committee	In several areas within the EIS the KHC is referred to as a hospital. Question: Will consideration of KHC as a health center rather than as a hospital have any impact on the final Environmental Consequences contained within the EIS?	The EIS has been revised to indicate that the King Health Center is not a hospital. This change does not affect the conclusions of the EIS. The conclusions of the EIS would not change if the King Health Center was considered a health center rather than a hospital.
3.	General	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and	If land is to be developed under "GOV" zoning, then all government building standards must be applied, including the most up-to-date environmental standards. For example, the EIS should detail that any development on GOV-zoned land would have to be GSA LEED certified.	AFRH will seek developers who place emphasis on low-impact development and environmental sensitivity, including the utilization of tools such as LEEDs.

Comment Number	EIS Section Number	Commenter	Comment	Response
		Janet Wahl, Abby		
4.	General	Carstensen, James	The impact study talks about having no impact on historic monuments. Considering the historic value of these grounds, we ask what is the rush? What is the rush to lease this precious surrounding land for eight-story condos, massive buildings with huge asphalt parking lots, and the accompanying traffic jams and smog? Once the land is developed it's gone forever. We believe there is a better way. There are ways to generate revenue from the land without destroying it. There are ways to get the Armed Forces Retirement Home the money it needs without building upon one of its most precious resources. Some would have us to believe that this debate is about	As stated in Section 1.3, AFRH's fixed income sources are insufficient to fund campus operations and improvements. Without implementation of the Master Plan, the AFRH Trust Fund will continue to diminish risking the viability of the home for both current and future residents.

Comment Number	EIS Section Number	Commenter	Comment	Response
			whether to erect six-story buildings or four- story buildings or to put condos here or there. That's a false debate. The issue is this. We need to make sure that the Soldiers Home doesn't fall under further financial neglect. Let's get the home the financial resources it needs but let's not sacrifice this great asset…. What we see is a rush to development. This issue is far too important to take the expedient way out. If we do our children and grandchildren will never see the land as Lincoln saw it. There is a better way. Working together we can do the right thing not only for ourselves, for our community, but for the entire nation and all generations to come.	
5.	General	Catherine McCarthy	150 years of tradition down the tubes, the military veterans squeezed into a few acres of what used to be their beautiful	Comment noted.

Comment Number	EIS Section Number	Commenter	Comment	Response
			and peaceful home. What a shame.	
6.	General	Crandall, Bill	Any development should be guided by firm, well-articulated guidelines mandating exceptionally high architectural quality, design/aesthetics, balance of uses, and good integration into existing neighborhood fabric. Especially in parcel 6 in areas adjacent to residential Petworth and Park View. If profit for the Home is the sole motivation and the highest bidder wins, we could end up with clumsy, ugly, ill-conceived projects that will potentially degrade - rather than enhance - the greater community	AFRH is continuing to work with the community and local agencies on the creation of design criteria which will guide all phases of development on the site.
7.	General	DC Office of Planning	The planning/development goals of the McMillan Sand Filtration site can be applied to the AFRH site. These include: 1) providing publicly accessible	Comment noted. The goals of the AFRH-W Master Plan have been established to ensure that the Master Plan is developed in a manner that meets

Comment Number	EIS Section Number	Commenter	Comment	Response
			recreation/open space; 2) preserving and adaptively reuse of site features; 3) creative development of the site, such as incorporating historic features, civic elements, and green buildings; 4) mitigating neighborhood impacts; and 5) maximizing revenue-producing opportunities on both private and non-profit components of the site.	the long-term needs of the AFRH while recognizing the importance of the AFRH-W resources and the local community.
8.	General	District of Columbia Department of Housing and Community Development	DHCD understands the need of the AFRH to create a development Master Plan that will be used to sustain the AFRH in the long-term, by replenishing its primary sources of operational funding, the AFRH Trust Fund. You proposed to accomplish this with revenue derived from the sale or lease of surplus parcels of land on the AFRH North Capitol Street Campus. We note that Congress has authorized, as part of	Comment noted.

Comment Number	EIS Section Number	Commenter	Comment	Response
			the National Defense Authorization Act for Fiscal Year 2002, the AFRH to sell or lease any property excess to its needs, with the approval of the Secretary of Defense, for the specific purpose of replenishing the AFRH Trust Fund. DHCD applauds and supports the AFRH for developing a Master Plan concept framework that has identified six zones of surplus land around the perimeter of the AFRH Campus that can be developed without compromising the historic landmark character of the historic core of the Campus. DHCD supports the development of infill institutional uses that will be compatible with current AFRH operations located in the designated Zone 1 development area. This specific proposal is common to all four Master	

Comment Number	EIS Section Number	Commenter	Comment	Response
			Plan development alternatives presented.	
9.	General	Douglas, David	I am a neighbor. I'm 40 feet from the Soldiers home and the young man from the Hospital Center that said he was a neighbor, that was part of Soldiers Home. That was the apple orchard that I played in. They had another meeting here when they put the three hospitals down there. Veterans and the Hospital Center, and they said that they were going to move the orchard and now that's the parking lot for the cathedral. That's where the orchard was supposed to be. So let me tell you once they start they are not going to stop. You can come in any gate in this place. I taught my son how to run cross-country right in this park. Security got bad and instead of trying to solve the	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property.

Comment Number	EIS Section Number	Commenter	Comment	Response
			problem they locked the place up. And you can't keep fear out. You have to face fear. You can't just keep locking yourself up. And that's what you have to do. And if you let them start pouring the concrete you are going to lose this place and you need it.	
10.	General	Felder, Charles	As with other zones, more comprehensive alternate plans are needed in order to assess the heavily adverse environmental impact of construction on the area of zone #1 and the health hazards to the in-dwelling population.	Construction activities can create fugitive dust from demolition, site grading, construction, wind erosion, and vehicular activities which can cause health related issues to persons in the vicinity of the activities. Measures to mitigate these types of impacts are provided in Section 4.5 of the EIS.
11.	General	Felder, Charles	Why are the Sheridan and Scott buildings not sensitive areas in regard to air quality, noise and the debris of construction in Zone #1?	Sheridan and Scott are sensitive areas. Mitigation measures outlined in the EIS have been identified to minimize and mitigate impacts to the residents of these facilities.

Comment Number	EIS Section Number	Commenter	Comment	Response
12.	General	Felder, Charles	Is it necessary for King Health Center to be evacuated to the proposed new King Hospital complex in Zone #1 before development begins in zone #3?	A new King Hospital complex is not proposed in the AFRH Zone (formerly Zones 1 and 2) at this time.
13.	General	Felder, Charles	When will construction begin on the King Hospital Complex, which will be directly adjacent to the dormitories of Independent Living, Assisted living, COPD, dementia patients and the clinics?	Schedules for construction will be determined after selection of a developer.
14.	General	Hafvenstein, Lauri	It is my conclusion that the EIS fails to address the impact of such large-scale development on the city and the surrounding neighborhoods in terms of traffic, air quality, storm runoff, temperature and noise. It fails to address the need for retention of green space and the initiatives by the federal and local government to expand and enhance	Impacts to the human environment have been rigorously evaluated and disclosed in the EIS. Additional information on parks and open space has been added to Section 4.2.4 of the Final EIS. The District of Columbia regulates both the quality and quantity of storm water runoff from proposed development sites. DC storm water regulations are intended

Comment Number	EIS Section Number	Commenter	Comment	Response
			public use parklands.	to prevent: 1) an increase in the quantity of storm water runoff from development sites, and 2) an increase in pollutants and suspended solids (quality) in surface runoff from proposed development. AFRH will be preparing a sedimentation and erosion control plan measures per DC regulations.
15.	General	Jackson, Latosha	I, too, like Mr. Douglass who lives 40 feet away from Soldiers Home, have sentimental feelings about allowing such a large development to be built. There are lots of kids in the area and traffic along the side streets will be unbearable. I have lived in the neighborhood 40 years and I am sure money can be raised to help the soldiers in another manner.	Comment noted.
16.	General	Jones, Amina	As a 19 year old college student that is contemplating joining the Armed Forces, I think that with the property that they	Comment noted.

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			want to develop should be used for another retirement facility. I know that if I in fact decide on joining the armed forces and one day I will in fact be a senior, I would want somewhere to go when I am too tired to take care of a house or other property that I might own. This estate was created for veterans, people that have served their country well… I say no construction on the soldier's home.	
17.	General	Larson, Michael Maready, Gerald	Maps of the site showing outlined borders of potential development zones, simple square footage estimates, and projected simple financials do not provide the information necessary in order to adequately determine the effect of the proposed master plan upon the historic fabric of the AFRH-W, upon the historic fabric of surrounding	The goals and alternatives provided in the EIS are the goals and alternatives for the Master Plan. The EIS includes a rigorous analysis of impacts to resources including historic resources, the community, and traffic.

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			neighborhoods, upon surrounding roadways, and upon the local environment. The DEIS (and by extension the Final EIS) is useless without inclusion of the full proposed master plan; it seems impossible to make the determination of effect presented in the DEIS with the bare-bones information about the proposed master plan that has been provided.	
18.	General	Marlow, Jacquelyn	There should be a balance between the need and the community. The presentation of the proposed building should not contrast what is already established in the neighborhood. This is to say it should not look like downtown DC Chinatown but that it should blend into the style and fashion of the established neighborhood.	Design guidelines are being developed which will prescribe architectural design and building height limits. Residential development in Zone C (formerly Zone 6) would be two to three stories in height in keeping with the Parkview and Petworth neighborhoods. The only place a building may be taller is in the vicinity of the AFRH-W

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				entrance at the end of Illinois Avenue.
19.	General	McGilvray, Andrew	As a matter of law, we must question the accuracy of the DEIS's characterization that AFRH parcels leased for development (instead of being sold) would remain subject to "GOV" zoning, rather than be subject to the District of Columbia's municipal commercial/residential zoning. We maintain that the uses proposed in the Master Plan documents are not inherently governmental in nature and, therefore, that D.C.'s municipal commercial/residential zoning authority would apply regardless of whether the land is leased or sold.	It is AFRH's intention to be a conscientious steward of its campus and any development that may take place there. The DEIS's characterization regarding zoning complies with applicable law. AFRH will carefully and assiduously consider land use comments or recommendations submitted by the District of Columbia. To date, AFRH has discussed and/or coordinated its project with the following District of Columbia Government offices: the Mayor, the Council, the Historic Preservation Office, the Office of Planning, the Department of Consumer and Regulatory Affairs, and the Department of Public Works. AFRH will continue its ongoing consultation and

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				coordination with the District of Columbia government for land use matters, and will be a cooperative neighbor throughout the project.
20.	General	MedStar/ Washington Hospital Center	MedStar/WHC fully supports the concept of development of the property being proposed in the plan. As the owner and operator of the medical complex on land immediately to the south across Irving Street, we believe that appropriate development compatible with AFRH and neighboring uses is important for the efficient use of land to benefit the community and City as a whole.	Comment noted.
21.	General	MedStar/ Washington Hospital Center	The clinical and research components of MedStar/WHC's plan have a unique compatibility with the mission of the home and could assist in providing or	Comment noted. The Master Plan Alternatives are not based on any single proposal. All proposals will be considered as the

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			coordinating development for this important site. In addition, the site would allow the expansion and renovation of WHC facilities, which can become a model for the delivery of medical services.	AFRH goes forward with implementation of the Master Plan.
22.	General	MedStar/ Washington Hospital Center	MedStar/WHC has the capacity and will pursue the opportunity to develop the entire property in an integrated and intelligent manner, respectful of the community and AFRH residents and guided by the leadership of AFRH.	Comment noted.
23.	General	National Trust for Historic Preservation	We … urge the Armed Forces Retirement Home to very carefully consider the impacts of the master planning process. In earlier master plans changes were made to the property that we now know dramatically changed the property and affected its historic character. We would not want to see	The AFRH understands the importance of the historic value of the AFRH-W. As the Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts to resources including the historic character of the site.

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			that happen again.	
24.	General	National Trust for Historic Preservation	First, as you all know, the draft EIS makes it very clear that there will be under these development alternatives long-term direct, major, and adverse impacts on the historic resources. We think the draft EIS needs to be looked at and modified to address those a little bit more carefully. For example, most of the alternatives that are proposed propose a great level of development and we think that alternatives should be looked at that can achieve some of the goals the Armed Forces Retirement Home is trying to achieve but reduce the level of development and therefore can reduce the impact on historic resources. Particularly in that regard are the views from the Armed Forces Retirement Home. Many of you know that President	The AFRH assessed a range of alternatives that would meet the long-term financial needs of the Home. Views from and to significant historic features of the AFRH-W are a major consideration in the design guidelines being prepared as part of the Section 106 process as mitigation for the adverse impacts that the proposed undertaking may have on the historic resources at the AFRH-W.

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			Lincoln enjoyed those views and was undoubtedly inspired by those views as many of you all have been. We want to make sure that the development alternatives that are looked at are done in a way that they will minimize the impact on those views over the long term.	
25.	General	Patykewich, Leslie	One of the draft EIS objectives indicates that the Master Plan will *"preserve and improve the essential components of the AFRH-W for residents and the community"* However, most EIS findings indicate *minimal negative impact* on diverse aspects of the environment, indicating few or any areas where the options contribute positively. In general, it appears the draft EIS falls short in showing improvement and preservation of the historical value, the environment, and the city's absorptive	As required by the National Environmental Policy Act, the EIS discloses adverse as well as beneficial impacts of the proposed action. As the Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts. Essential components of the AFRH-W, including resident areas, core historic resources such as the U.S. Soldiers' and Airmen's Home National Historic Landmark and National Register Historic District, and open-space such as

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			capacity.	the golf course, are preserved in the Master Plan Alternatives. AFRH-W is located on 272 acres. Of these, 112 acres that make up the Historic Core and the Central Green will not be developed. Further, 56 acres are reserved for AFRH use and 104 acres are available for development in phases.
26.	General	Patykewich, Leslie	According to the draft EIS, the Master Plan will "Grow the Trust Fund to not only meet the needs of today's residents, but the needs of future generations as well." It does not appear that the EIS has adequately addressed quality of life needs of the current residents nor the long term requirements of the AFRH to meet the future (and likely growing) needs of veterans. (Again, I refer to the thoughtful comments of our veterans and concerned community on this matter).	As stated in Section 1.3, AFRH's fixed income sources are insufficient to fund campus operations and improvements. Without implementation of the Master Plan, the AFRH Trust Fund will continue to diminish risking the viability of the home for both current and future residents. The quality of life for the residents is of the utmost importance to the AFRH and is a key goal of the Master Plan.

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			This should be the real goal of any proposal and I would encourage their current and future needs to be elevated to the highest priority.	
27.	General	Patykewich, Leslie	Although, the Master Plan indicates it will *"Attract development, at fair market value, that is compatible with the mission of the AFRH"*, I am concerned that fair market value does not take into account the need for low income housing or the need to maintain the wonderful diversity of the community. The environmental justice findings indicate that low income and minority populations would not be disproportionately affected by impacts of the alternatives. However, there appear to be no benefits to these groups in terms of housing options. Furthermore, I would like clarification as to how	The exact type and cost of new housing and retail space, if any, to be built on the AFRH-W would depend on market conditions and on decisions by the developer(s) and is beyond the scope of this EIS. Residential housing, retail, and office buildings are all compatible uses with the AFRH-W since these types of uses already exist on the site.

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			residential housing, retail, and office buildings are "compatible with the mission of the AFRH."	
28.	General	Prather, Marcel	As do many of my neighbors, I find it hard to accept that alternatives which won't ruin the very nature of the Soldier's Home as a retirement community and take away one of D.C.'s few remaining open spaces, have all been explored. I also am convinced that no matter which of these development projects is selected, noise and traffic will impact the surrounding neighborhoods profoundly. I urge the planning committee to consider the negative impact all of these development scenarios will have on both the Soldier's Home residents and our neighborhoods.	The EIS includes a rigorous analysis of impacts to the human environment including noise, transportation, transit, parking, and community services.
29.	General	Quick, George	Proposed plans 2, 3, and 4 call for institution development in the area	The institutional uses referred to in Alternatives 2, 3, and 4 would consist of

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			around the Sheridan building. This opens a whole can of worms. Institutional can be anything from a prison to an insane asylum.	additional facilities to serve or complement the AFRH or institutional uses such as schools.
30.	General	Richardson, Janisha	I am a resident of Columbia Heights on Princeton Place, NW. I ask that the EIS look into having a public park instead of selling the land to developers. I also ask that the community have strong voice in the development of the land.	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property.
31.	General	Robert Davaney	4-26: The AFRH-W is zoned GOV, Government and therefore is not subject to local zoning regulations unless portions of the site are sold to private parties. Implementation of the AFRH-W's Master Plan would result in a considerable change to zoning on the site if segments of the AFRH-W are sold. If the land for development were leased, it	Comment is outside the purview of this EIS.

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			would be subject to zoning. Based on the statement that leased land is not subject to zoning because the AFRH-W is government, this exemption, when applied to Home Residents, has a positive effect because Home Residents will be exempt from DC control and may keep the domicile of their choice. This will allow residents to vote for their Representatives and Senators. A domicile in a "No State Tax state" will have a positive effect on our Home Residents. 4-30: In addition, the presence of the AFRH in the City would bring the benefit of tax revenue from any resident employee, as well as local commercial entities that do business with the AFRH. "Resident employee," If the employee is	

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			a resident of DC and employed at AFRH, yes, they should pay DC taxes. But if it means a Home Resident employee working in AFRH, that creates an issue. Present policy does not provide for home Residents to work for a salary at AFRH. No effect on the social status of AFRH residents. 3-18: According to the District of Columbia Generalized land Use Map, land use on the AFRH-W is characterized as "federal," meaning that the land and facilities onsite are occupied by the federal government (DC Office of Planning, 2002). A site occupied by the federal government should be considered a "Federal Instrumentality" and immune from State control. DC has	

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			characterized AFRH-W as "federal." 3-23: Sales and Use Taxes: This District of Columbia imposes sales and	
			use taxes on the purchase or consumption of tangible personal property or services with the District. Sales or use at the AFRH-W are not within the District and taxes should not be collected. This is a positive impact on the social status of Home Residents. 3-24: Individual Income Taxes: Individual income taxes re levied on all individuals who are domiciled in the District. (Black's law Dictionary describes a domicile as the place a person states that it is where his is to live permanently and when he is absent, he will return.) AFRH-W Employees who are residents of the District would pay	

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			individual income taxes. (Of course, if they live in the district and work at AFRH-W, they should pay DC taxes.) AFRH-W residents may be domiciled in another State. Voting rights are not removed from a resident domiciled in another sate and the income tax laws of that domiciliary prevail. Full application of 3-24 will have a positive effect on Home Residents. 3-25: In 1851, the Federal Government purchased farmland surrounding the Cottage to form the historic core of what was called the Military Asylum (HFH, 2004). General Scott used some the $175,000.00 to pay his troops, buy supplies and offered the remainder to Congress to establish the Soldiers Home (ibid).	

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			US Code, Title 24 is entitled "Hospitals and Asylums" and the Armed Forces Retirement Home is established under Title 24. In my opinion, being an inmate in the Asylum is not at all bad. We are definitely not under the control of the District of Columbia. 3-29: The same area was listed in the National Register of Historic Places as a historic district in 1974. the area designated as Nation Historic Landmark was listed in the National Register of Historic Places as a historic district on February 11, 1974, under the name "U.S. Soldiers' and Airmen's Home" (EHT Traceries, 2004). 3-31: In 1988, The District State Historic Preservation Officer (SHPO) determined that the entire 272 acre AFRH-W property is eligible for listing	

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			in the National Register as a Historic District. The rationale for my comments is to ensure that the final EIS is accepted that Home Residents of AFRH-W will keep their rights to declare a domicile of their choice and enjoy the voting rights and taxing authorities of their choosing. Residing at AFRH-W for medical or whatever reason must not mandate that residents forfeit their hard fought-for privileges and rights. It should be resolved that if zoning and various sundy laws are not enforceable on AFRH-W property, why aren't AFRH-W residents entitled to the same consideration?	
32.	General	Shelley, Allison	Please reconsider, this project will forever change the historic nature of this valuable piece of property – one of the very few green spaces left in our city, as well as a historically significant	Under the Master Plan Alternatives studied in the EIS, approximately 182 to 188 acres (67 to 70 percent) of the AFRH-W would remain in open space. As the Master Plan is implemented, the

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			landmark. Surely there are more environmentally responsible ways to raise the needed funds. Judging by the comments made at the public hearing, it seems that neighbors and home residents had not been contacted about any of these plans before they were created. Let's take some time here. It seems reasonable to assess the resources available – including government grants and subsidies for the preservation of open green spaces, before launching into massive, irreversible development that does not enhance the community with needed parks, etc. but surely promises to worsen traffic and parking issues in the neighborhood.	AFRH will make every effort to further avoid and minimize impacts to resources including the mature trees on the facility. After the release of the DEIS, the AFRH took an active role in involving the community through several community meetings and the development of a Planning Committee to review the Master Plan design guidelines. The Planning Committee is comprised of representatives from the community, institutional neighbors, the development industry, and District and Federal planning agencies.
33.	General	Stephens, Arlus J.	The DEIS overlooks the historical importance of the property and maintaining its coherence. There should	The AFRH understands the importance of the historic value of the AFRH-W. The AFRH has coordinated with the

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			be more detail in the DEIS including consideration of knowledgeable sources on the subject, such as the Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation.	Advisory Council and the National Trust during development of the Master Plan and will continue coordination throughout the development process.
34.	General	Sullivan, Matthew	I find the proposals contained within the draft EIS to be far too potentially damaging to the environment of NW Washington DC. I believe that the sheer amount of concrete and asphalt alone will disrupt the local ecosystem. The current green space acts as a natural buffer to the heat retention and decreased drainage of the concrete that exists outside the home.	See response to Comment #25. The AFRH will make every effort to avoid and minimize impacts as the Master Plan is implemented. AFRH will seek developers who place emphasis on low-impact development and environmental sensitivity.
35.	General	Swanson, Lisa	I know some people think there should be no development here at all. I'm with the Sierra Club. You might think I'd say that too but sometimes development in	Comment noted.

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			an already developed city area if it's done well, if it's done ecologically and with the people in mind, is better than creating a sprawl elsewhere and knocking down trees in a lot of other places.	
36.	General	Sylvia, Elton Sr.	As I look over your Environmental Impact Statement, this plan could be prosperous for the AFRH. Also it could become a financial drain on the budget. I can also see the AFRH-W in the future will lack admission to the home forcing the home to close. My questions… if this should happen would the "US Old Soldier's Home" become a National Historic Preservation Museum? How about a Granite Wall with all residents that have lived here from 1841 to present, have their names engraved? Our grandchildren and great	Comment noted.

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			grandchildren would have a great time.	
37.	General	Valenti, Cliff	Personally, I am against development of any of the property of the Armed Forces Retirement Home (especially zone 6 along Park Place), with the exception of renovation / expansion of existing buildings. I believe redevelopment along Georgia Ave is essential to the quality of life in this area of DC, and any competing development risks over-development.	Comment Noted. Zone A (formerly Zones 3 and 4) is located along North Capital Street and would serve a different market than the planned Georgia Avenue development. It is anticipated that development along Georgia Avenue would occur before the development in Zones B and C (formerly Zones 5 and 6). Development in Zones B and C would be undertaken in later phases if needed to meet the Home's financial needs. If AFRH decides to pursue its development plans for this site, the alternatives proposed will take into consideration the adjacent historic neighborhoods to the west as well as views into the AFRH-W site. Development in these zones is intended to reflect the character and scale of the

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				adjacent fabric. The residential uses located in these zones will be built at a scale similar to the existing residential neighborhood and medical, institutional, institutional and commercial uses proposed along the southern and western portion of AFRH-W.
38.	General	Valenti, Cliff	The May 2005 draft contains many contradictions: • Section 1-9 says Minority / Low Income populations potentially could be disproportionately affected vs. section 2-17 Low Income and minority populations would not be disproportionately effected. • There may not be sufficient infrastructure to support the additional facilities (1-11) vs. "no direct impacts to water resources" (2-16) and other statements listed throughout (see vii,	Section 1.9 of the EIS provides indicators against which alternatives are assessed to determine if impacts would occur and, if so, what the severity of the impact would be. This section of the document does not illustrate what will happen rather it describes the type of impacts that should be looked for when assessing and describing impacts in Chapter 4, Environmental Consequences. Table 2-10 provides a summary of the impacts discussed in Chapter 4.

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			viii).	
39.	General	Valenti, Cliff	Almost all of the Impact Summary shows a negative effect to the existing community: • More traffic on roads the draft says are already congested (vii). • Alt 3A/3B and 4 site access would fail (2-20) North Capital St would fail • Removal of mature trees (2-16) • Adverse effects on aquatic life (2-16) • Adverse effects to topography (2-16) • Increase noise level (viii) • Degraded air-quality (viii)(1-11)(2-20) • Decreased green space • Increase in city and federal services (2-17) • Direct, long-term adverse impact on archeological / historical significance	See response for comments # 25 and 37. As required by the National Environmental Policy Act, the EIS discloses adverse as well as beneficial impacts of the proposed action. As the Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts. As required by the National Environmental Policy Act, the EIS discloses adverse as well as beneficial impacts of the proposed action. As the Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts. AFRH as part of its development agreements with developers intends to enter into a transportation management plan. At this time, there is insufficient

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			(2-19) Says current Lincoln cottage views would be adversely affected, yet the city and federal government have spent allot of money to preserve this historic sight. Only short term interests of developers and profiteers are served by this plan, but the long term interests of Washington DC, residents of Petworth, and residents of the Old Soldiers Home are not represented.	information to develop transportation management strategies as each alternative proposed creates different traffic conditions. The traffic impact study in the EIS is a worst case scenario and will be updated to reflect the alternatives that AFRH will implement. AFRH will encourage developers that present concepts that propose well developed plans that will mitigate adverse environmental impacts.
40.	General	Van Wye, Brian	Substantial efforts (e.g.: a set aside of jobs) should be made to ensure that DC residents benefit from job opportunities associated with construction and development	Comment is outside the scope of this EIS.
41.	General	Van Wye, Brian	Little effort made to clearly explain alternatives and criteria to evaluate them. Presentation esoteric. Not detailed	Detailed descriptions of the alternatives under consideration are included in Chapter 2 of the EIS.

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			description of alternative – brochure had too little info – much less than the presentation.	
42.	General	Walsh, Deborah	I received a flyer two days ago. Why was I left out? This plan is not designed for the good of the internal or external community. This is about people making money and not about the men in this home needing money.	The AFRH assessed a range of alternatives that would meet the needs of the Home.
43.	General	Welch, Suzanne	Transitional Housing Corporation The EIS did not adequately address the housing demands and needs pressing on the District today. Affordable housing is in great demand and need, not embassy housing, hotels or high rise condo. Please consider the enclosed Housing in the Nations Capital 2004 by the Urban Land Institute and Fannie Mae Foundation, where residential uses are	The exact type and cost of new housing and retail space, if any, to be built on the AFRH-W would depend on decisions by the developer(s) and is beyond the scope of this EIS.

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			considered at least 20% should be affordable for sale or for rent housing for low and moderate income families.	
44.	1.1	Cody, Martin	Somewhere in Introduction state what this EIS does not include: 1. No economics of various options and alternatives 2. No input from the "Master Plan" with its goals or alternatives. 3. No priorities are given to various options as benefiting the residents, eg; hospitals, medical schools, cancer research center/clinics are better than residential units (4000 homes/apts) traffic, car parking problems, etc. get last priority to foreign embassies (no value for residents – only money).	The AFRH assessed a range of alternatives that would meet the needs of the Home. The goals and alternatives provided in the EIS are the goals and alternatives for the Master Plan. The development uses identified in the alternatives are compatible with the mission of the AFRH.
45.	1.3	Hafvenstein, Lauri	Just how much money must be raised to support the ongoing requirements of the	The Home plunged into a financial crisis in the 1990s when expenses routinely

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			AFRH?	began to outstrip revenues. In 2002, Congress ordered the Home to hire professional managers with experience in retirement community operations and gave the Home permission to develop its underutilized property in order to replenish the Trust Fund and generate new funding sources. Since then, a new administration has brought costs under control by consolidating operations, cutting expenses and the number of employees and using vendors to provide high quality services for lower prices. These measures will save the home $1.1 billion over a 5-year period. In 2004, the Trust Fund had a balance of $118 million after adding a one-time $22 million infusion of cash from the sale of a piece of land to Catholic University. While these

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				innovations helped, the Home cannot continue to sell off pieces of its legacy and cost saving measures alone cannot generate the funds needed to pay for new buildings and major renovations which are needed to guarantee a safe and secure home and high quality medical services for future generations of American heroes.
46.	1.3	Patykewich, Leslie	Share the financial report of AFRH that shows how much revenue is required and how much will be generated with these and other options. Share the projected capacity needs of AFRH (in terms of space and growing numbers of veterans ensuring that quality of life is NOT compromised)	See Comment # 45. The AFRH *Fiscal Year 2004 Annual Performance And Accountability Report* is available on the internet at http://www.afrh.gov/files/pdf/afrhannualreport.pdf
47.	1.3	Swanson, Lisa	Though sensible growth in areas with existing roads, schools and other	See Comment # 45. The AFRH *Fiscal Year 2004 Annual*

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			services is preferable to creating sprawl, we do not need to sacrifice increasingly precious green space, useable by all for recreation and other purposes, to development for unsubstantiated need for income. Until the financial situation is explained the "needs" of this entity are justified, further development that compromises the economic and physical health of the neighboring community cannot proceed.	*Performance And Accountability Report* is available on the internet at http://www.afrh.gov/files/pdf/afrhannualreport.pdf
48.	1.3	Tulchin, Drew	The EIS does not mention, suggest, or provide financial information as to how sale of land and development thereof is really a solution to the economic challenges of the AFRH Master Plan. The first solution of non-sale should explore other revenue generation schemes, including but not limited to: reduction in costs, better budgeting,	No decisions regarding the lease or sale of land have been made. Additional information on the financial needs of the AFRH and steps already taken to reduce costs is included in Section 1.3.

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			increasing contributions from enlisted men, fund-raising, and rental of existing resources. Without a sense of the economic need, there is no way to determine if the suggestions truly would be successful or not. Options other than just sale must be explored, as sale is a short term gain, not a long term sustainable solution.	
49.	1.3	United States Department of the Interior Office of Environmental Policy and Compliance	In addition, the financial needs of the AFRH that have stimulated this proposal are not quantified. Beyond stating the need for increased funds, there is no indication of how much of the facility must be converted to revenue generating development in order to sustain the facility. Without such information, we believe the master plan lacks a sound basis for decision making.	See Comment # 45. The AFRH *Fiscal Year 2004 Annual Performance And Accountability Report* is available on the internet at http://www.afrh.gov/files/pdf/afrhannualreport.pdf

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50.	1.3 and 2.1	Donahue, Kathleen	Alternative 1 is no action but is unlikely to be a viable option. Alternatives 2-4 utilize all of the conceptual development zones and none of the alternatives consider only partial development of the six zones. Not clear why so much development is required because there is no financial information included. The final EIS should have development alternatives that would have less impact on the surrounding area, or a disclaimer about why less development is not financially feasible for AFRH.	AFRH will seek developers who place emphasis on low-impact development and environmental sensitivity, including the utilization of tools such as LEEDs. Under the Master Plan Alternatives studied in the EIS, approximately 182 to 188 acres, or 67 to 70 percent, of the AFRH-W would remain in open space. Additional information on the financial needs of the AFRH and steps already taken to reduce costs is included in Section 1.3.
51.	1.4	AFRH Master Plan Committee	To understand the "essential components of the AFRH-W" it is necessary to have available a listing of these essential components of the AFRH-W. Question: In detail, what are the	Essential components of the AFRH-W including resident areas, core historic resources such as the U.S. Soilders' and Airmen's Home National Historic Landmark and National Register

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			essential components?	Historic District, and open-space such as the golf course, are preserved in the Master Plan Alternatives.
52.	1.5	Department of the Interior	Section 1.5 Background should acknowledge the importance of the AFRH-W in the history of the design of the City of Washington. It is notable that the setting and planning of the AFRH-W has been of concern and assigned importance for well over one hundred years. The presence of the "Soldiers Home" at the time of the development of the "MacMillan Plan" in 1902 underscores the dependence upon this park-like setting to continue in a vain similar to the parkland of Rock Creek. It appears to have been the status of The Soldiers Home as a continuing stable presence that allowed the area between Rock Creek and the Anacostia	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property. In addition, under the Master Plan Alternatives studied in the EIS, approximately 182 to 188 acres (or 67 to 70 percent) of the AFRH-W would remain in open space. Design guidelines are being developed which will prescribe building height limits. As the Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts to resources including the mature trees on the facility.

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			River to retain or create few park, open space and recreation areas in Northeast Washington. Portions of the proposed Master Plan suggested for development would severely reduce the contribution that the current facility now makes and should make to the park and open space component of the Nation's Capital.	
53.	1.8	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	Some important stakeholders were not on your list of individuals and organizations to whom the DEIS was provided. The District of Columbia Department of Parks and Recreation (DPR) was not served with the DEIS. My understanding is that they did not learn of the draft EIS until July 1 inadequate time to properly respond and even then only learned of the DEIS through concerned city residents. The comment period for the DEIS should be	The AFRH has coordinated with stakeholders and government agencies throughout the development of the Master Plan and the EIS. The National Park Service Philadelphia Office is responsible for reviewing EISs for the Northeast and National Capital Regions. Notification of the availability of the Draft EIS was sent to the Associate Regional Director of the Office Lands, Resources, and Planning for the National Capital Region.

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			extended so that DPR can complete its own comprehensive planning process in a way that can consider potential use of part of the AFRH property to meet city park needs. In addition, it is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the DEIS. Notice of the DEIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for Washington's monumental core or to the superintendent of Rock Creek Parkway.	
54.	1.8	Crandall, Bill	The AFRH needs to seriously and substantially incorporate neighborhood concerns into any development plans. Not just lip service, a pat on the head, and checking 'get community input' off the to-do list.	AFRH has involved the residents of the Home throughout the Master Plan process and will continue to do so. The quality of life for the residents is of the utmost importance to the AFRH and is a key goal of the Master Plan. The AFRH is committed to involving the

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				community as it moves forward with implementation of the Master Plan. In addition to the public hearing on the draft EIS that was held in June, AFRH continues to encourage dialogue with the community through ANC meetings, a website developed for the purpose of providing the community with development plans and where the community can register to provide input. The next phase of this involvement will include meeting with the community to review the proposed Master Plan design guidelines. AFRH plans to have three community meetings in the neighborhoods of Parkview, Petworth and Pleasant Hill during the months of October and November this year. It will inform the community through the Department of Planning and various

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				local media. AFRH will also directly contact residents that have provided contact details to provide them with information on community meetings. The website set up for the purpose of this community outreach is www.afrhdevelopment.com
55.	1.8	DC Office of Planning	A major suggestion is that the process for including the District government and the general public, particularly the surrounding neighborhoods, should be clearly outlined and adopted for the entire process. Both the District government and surrounding neighborhoods should be afforded ample opportunity to determine how the programmatic targets for each development scenario and any sufficient alterations are massed on the site and	See response to comment # 54.

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			respond to concerns/requirements related to historic preservation, adaptive reuse of existing structures, open space, transportation and economic impacts. It has been the District's experience that community charrettes (workshops) are an effective way to allow residents and other stakeholders to participate and help shape outcomes of planning/development processes.	
56.	1.8	Feny, Adrian	As you are aware, there is a number of very active community groups which have weighed in on this proposed development and since the likely footprint is so large, perhaps as large as eight million square feet, it's imperative to continue to not only welcome community input but really to ensure the comments and concerns of those affected are incorporated into the final	See response to comment # 54.

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			version of the environmental impact study and ultimately the master plan for the project.	
57.	1.8	O'Brien, Bob	I do think it's premature to submit these proposals without residents having had the opportunities to become more familiar with the plans and the effect it will have on their lives here at Armed Forces Retirement Home.	See response to comment # 54.
58.	1.8	Patykewich, Leslie	Lastly, contrary to the stated objective of ensuring *"an open, participatory process with the AFRH-W residents and the community",* I do not feel that the community was given the sufficient time or information needed to actively participate in this process and question the earnestness of the AFRH's intent to engage the community in this process. Few of us knew of the June 22 meeting and even fewer of any prior steps. I	See response to comment # 54.

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			refer to the many written and voiced comments supporting this concern. I would like the AFRH to extend and open this process and would also like to ensure that from here out, the AFRH be more transparent and take more active steps to ensure stakeholder participation. I would also like to ensure that a community representative participate in all meetings and that minutes and updates be shared monthly.	
59.	1.8	Patykewich, Leslie	Improve transparency: ensuring community representation and monthly updates. Provide three dimensional mapping of proposal. Describe the EIS process in terms of participation and transparency and conduct a survey of stakeholders to measure their perspective of the process	See response to comment # 54.

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			thus far.	
60.	1.8	Sullivan, Matthew	I would encourage the AFRH to consider slowing down the pace of proposed development. Once an area is sold and developed, it's gone forever. While I have no problem, per se, with development at AFRH, I would like to see a more thought out process that includes community involvement at all phases.	See response for #54. AFRH needs financial return in 2007 so the pace of the proposed development cannot be slowed down. AFRH has elected to phase its development. AFRH plans to solicit offers for development of Zone A (formerly Zones 3 and 4) in the immediate future. Development in Zone B and C (formerly Zones 5 and 6) would be undertaken in later phases if needed to meet the Home's financial needs.
61.	1.8	Valenti, Cliff	How do the Soldiers feel about this? Every soldier I have talked to either doesn't know about it, or is against it. I am told by long time residents in the neighborhood that the reason public access was closed off at the Old Soldiers Home was because they wanted it to be	AFRH has involved the residents of the Home throughout the Master Plan process and will continue to do so. The quality of life for the residents is of the utmost importance to the AFRH and is a key goal of the Master Plan.

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			peaceful and quite for the soldiers, now we're talking about creating a city within a city? The increase from the Lincoln Cottage is certainly going to make it busier around there, but not to the point that creating this huge development will.	
62.	1.8	Van Wye, Brian	Thus far, efforts to engage the community in the process have been inadequate: I read the paper and listen to the radio and walk streets near the AFRH, but I have heard nothing about this proposal until a few weeks ago – despite the fact that Federal Regulation notice appeared in August 2004.	After the release of the DEIS, the AFRH took an active role in involving the community through several community meetings and the development of a Planning Committee to review the Master Plan design guidelines. The Planning Committee is comprised of representatives from the community, institutional neighbors, the development industry, and District and Federal planning agencies.
63.	1.8	Williams, Virginia	I'm a resident of Petworth and am a bit concerned that the Soldier's Home development decisions are being made	After the release of the DEIS, the AFRH took an active role in involving the community through several community

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			too fast, and with only one public hearing. For what it's worth, here's a recent article in the NY Times that makes the case to proceed slowly, and with care, because 100-year-old trees won't shade our family picnics if they're paved over in a quick effort to make a profit. (article included with copy of comment)	meetings and the development of a Planning Committee to review the Master Plan design guidelines. The Planning Committee is comprised of representatives from the community, institutional neighbors, the development industry, and District and Federal planning agencies. The AFRH will make every effort to minimize impacts to the mature trees on the facility.
64.	1.9.2	AFRH Master Plan Committee	Chapter 1, page 1-12, Site Landscaping "…depend on decisions by the developer(s) and is beyond the scope of this EIS". Question: Should there be a system in place assuring that any "decision" by the developer maintains the visual esthetics philosophy or concept of the AFRH-W? Note: This question relates to one of the	Design guidelines which will be included in the Master Plan will be written to emphasize the importance of the historic landscape and other resources. All proposals for development will be assessed against these guidelines and developers will be required to abide by them.

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			stated objectives of the EIS (page 1-3) "Preserve and improve the essential components of the AFRH-W for the residents and the community.	
65.	2. 0 General	Felder, Charles	Since the irretrievable loss of the AFRH-W Historic District, which is eligible for listing in the National Register, adversely impacts on all present and future AFRH-W eligible veterans, can modified plans and other sources of income also be investigated through the Master Plan?	AFRH has assessed a range of alternatives which are consistent with the requirements of the National Defense Authorization Act of 2002.
66.	2.0 General	Adams, Nathaniel Jr.	Senior Citizens who now tire of caring for their regular houses in DC must now relocate in MD or VA for "senior communities." Could not some of this property become properties for "senior community" establishment, whereby seniors would purchase or lease reduced-	The alternatives studied in the EIS include residential housing. The type and size of this housing has not yet been determined.

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			size residences?	
67.	2.0 General	Boylan, Kathy	Fund the Old Soldier's Home by: 1. Change the requirements to allow homeless veterans and disabled veterans, their monthly checks would help fund the home. 2. Invite Not for Profit groups serving veterans to take over unused buildings and pay rent. 3. Allow U.S. Park Service to take over land for park. Park Service would then pay for mowing and other land, tree, and pond care. 4. Demand that the Federal Government pay to maintain the Armed Forces Home. 5. Stop the war in Iraq and use the money for funding. 6. Use the home to serve some of	AFRH has assessed a range of alternatives which are consistent with the requirements of the National Defense Authorization Act of 2002.

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			the thousands of seriously wounded soldiers returning from Iraq and Afghanistan. Also serve the needs of the many who are returning from war suffering from a mental disorder. 7. Close Walter Reed and use the money for the Soldier's Home	
68.	2.0 General	Byke, Emil	I attended Mr. Cox briefing of the DEIS on June 15. What I perceived is that Mr. Cox's main issue is how to increase revenue for the Home Trust Fund – I have two simple solutions which would not cost the Fund 1. Congress in 1995 passed a bill to increase donations from active duty personnel the sum of fifty cents to one dollar per month – all that needs to be done is to have Dept of Defense order it to be.	The increase of payroll deductions is outside the scope of this EIS. Reuse opportunities are being considered for many of the buildings on site including the LaGarde Building.

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			2. Transfer or lease to the Veterans Administration the King Health Center specifically the LaGarde Building. This building cost the Fund approximately 65% of our operating budget.	
69.	2.0 General	Catherine McCarthy	Why so many housing units? Are we to become just another small sub division of DC?	The alternatives assessed in the EIS were developed with varying mixes of office, commercial, and residential uses.
70.	2.0 General	David Douglas	Please, please, be a good steward… keep the green space, we need the OXYGEN!	Under the Master Plan Alternatives studied in the EIS, approximately 182-188 acres (67 to 70 percent) of the AFRH-W would remain in open space.
71.	2.0 General	Edward Strites	Please preserve our Grant Building and have developers include it for their plans. Include opportunities for the able bodied residents to be employable on part-time/full-time basis by the developers/contractors and for future	Comment noted. Reuse opportunities are being considered for many of the historic buildings on site including the Grant Building.

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			work opportunities after development is over. Provide projects educational/medical/ recreations opportunities to residents to ensure quality of life improvement, enticement thereby.	
72.	2.0 General	Friesel, Larry	… there should be more plans to build at least one more dormitory in addition to the Scott and Sheridan buildings.	Comment noted. The AFRH Zone (formerly Zones 1 and 2) has been designated for development of additional facilities to serve the residents of the AFRH, if needed.
73.	2.0 General	Friesel, Larry	There has been mention made of a parking garage. I believe, this would be an outstanding addition to concentrated the parking, rather that spread the parking around in different parking areas The location should be at the end of the Sheridan building across the street from the existing security office or location, in the parking area that is now in that	Comment noted.

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			location. The parking garage should be a least five stories height and have a least 2 elevators to transport the people using the facility.	
74.	2.0 General	Friesel, Larry	AFRH-W should immediately adjust or change the age minimum criteria to accommodate some from those conflicts and/or actions.	Comment noted. A change in the resident age is outside the scope of this EIS.
75.	2.0 General	Friesel, Larry	I was in attendance to most of the meetings if not all and it is apparent that everyone has an opinion as to what and how this land is used. Again, the over 150 year historic usage should always be emphasized to the Veterans and not offices and parks that have limited value to the residents.	Comment noted.
76.	2.0 General	Friesel, Larry	The Sherman Building – the front of the building has been renovated and restored, but the first 2 floors in the	Comment noted. Retention and reuse of historic buildings is considered in all of the Master Plan Alternatives.

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			middle of the building has been ignored or left to storage and general deterioration. This building, historically has been built as a dormitory, but is now office space, storage and hobby rooms on the third floor. More and better usage of this building is sorely needed. If funds are available to do the necessary work on the front 3 floors and the relocation of the security offices, then funds should be there for the 2 floors in the middle of the building.	
77.	2.0 General	George, Michael R.	Make Areas 3, 4, 5 AFRH-W National Graveyard.	Use of the AFRH-W property for a cemetery would not generate the funds needed to meet long-term AFRH needs.
78.	2.0 General	Jones, Timothy	Return to an increased agricultural use of land; studies have shown that the most profitable farms are close to urban centers. A certified USNA organic farm will reduce AFRH costs of operation and	These alternatives would not generate the funds needed to meet long-term AFRH needs

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			generate revenue. Green houses and hydroponics gardens can generate year round revenue stream. Fresh Fruits and vegetable can be made available to Washington Hospital complex. Additional fish farming can be source of funds as well.	
79.	2.0 General	Josephine Soboleski	Security Safety Serenity For such a "vast" undertaking – are these truly a part of the "master plan?" I hope so.	The AFRH has considered security, safety, and quality of life in developing the Master Plan Alternatives shown in the EIS. The Master Plan will include a new secured perimeter that will maintain the security of AFRH-W operations for its residents. Development in Zones A, B, and C (formerly Zones 3, 4, 5, and 6) would be open to the public.
80.	2.0 General	McLaughlin, Amy	Please re-work your plan to consider a park, running/biking path and green spaces that would be accessible to neighbors. I would be willing to pay an	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the

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			annual fee to have access to this land as I am sure others would. This could be a potential source of revenue.	property. The Master Plan will include circulation plans including pedestrian walkways within the AFRH-W.
81.	2.0 General	Michael Longwell	The one solution to solving the AFRH financial problems was not addressed. This solution would raise the $.50 a month deduction form active duty military (enlisted and warrants) to $1.50 ($1.00 is already authorized but not implemented). This solution would generate an additional $14 million per fiscal year exceeding by $3 million in any of the proposed plans. This solution (a very viable and realistic one) would generate more revenue without leasing or selling of any land. This solution would be paid for by the very service members who on day may be living here. It makes a lot of common sense.	AFRH has assessed a range of alternatives which are consistent with the requirements of the National Defense Authorization Act of 2002.

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			This is a realistic solution not a political one.	
82.	2.0 General	Patricia McClinton	I am against #6, put in near North Capitol Street.	Comment noted. Development in Zones B and C (formerly Zones 5 and 6) would be undertaken in later phases if needed to meet the Home's financial needs.
83.	2.0 General	Van Wye, Brian	Public parks and green spaces must be a part of this plan if AFRH expects community support. Walkways across the property (E-W) should be incorporated	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property. The Master Plan will include circulation plans including pedestrian walkways within the AFRH-W.
84.	2.0 General	Van Wye, Brian	Retail should be part of the final design on both east and west sides of AFRH	Retail components have been included in each of the Master Plan Alternatives.
85.	2.0/General	Adams, N.M. Jr	Instead of new construction for "condos," why not utilize existing vacant dormitory building and greatly "under-	Reuse of existing buildings on the AFRH-W is considered under all of the Master Plan Alternatives.

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			used" dormitories. Contracts could be awarded to reduce each building to bare walls and floors; followed by subsequent complete "up-scale" re-furbishment to the maximum levels attainable (both interior and exterior). Once down, such apartments could be sold at the highest "market-rates" which are now prevalent. Such an effort would result in the large income levels which you are seeking and should be compatible with the neighborhood complaints.	
86.	2.0/General	AFRH Master Plan Committee	All eight character areas obscure historic views and open spaces from within the AFRH-W. The sequestered golf course is almost the only open space and cannot be seen from off the compound. What are the possible ways to consider expanding the open space areas within the EIS span of control?	The building heights in each of the alternatives have been established with the sites viewsheds in mind. The development zones shown in the Master Plan Alternatives include open space which will be designed to enhance the AFRH-W campus.

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87.	2.0/General	AFRH Master Plan Committee	After scoping, might modified alternative plans be formulated to develop fewer zones, in the event that overall adverse effects of developing all zones are too severe?	The AFRH plans to solicit offers for development of Zone A (formerly Zones 3 and 4) in the immediate future. Development in Zones B and C (Zones 5 and 6) would be undertaken in later phases if needed to meet the Home's financial needs.
88.	2.0/General	AFRH Master Plan Committee	The golf course driving rage is considered an essential component of a golf course. Will the golf driving range be maintained or relocated? If relocated, where?	Until the design plans are developed it is not known if the driving range will be relocated. If the driving range is relocated, a separate NEPA document would be prepared to assess the environmental impacts of that action.
89.	2.0/General	AFRH Master Plan Committee	The uniquely strategic location of the AFRH-W on secure government property serves as a military and Homeland Security vantage point as a point of protection for the Capital of the United States. The property has been used in the past to station defensive	The need for the AFRH-W to serve a military or homeland security function has not been identified.

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			equipment and materials and serve as a landing and staging area. What has been the response of the appropriate Defense Department agencies to the potential loss of the ability to use the AFRH-W for purposes of national defense?	
90.	2.0/General	AFRH Master Plan Committee	Is there any construction, improvements, modifications, etc. contemplated or contained within the Master Plan for any area not currently designated within a zone? Note: There is no mention in the document relating to the environmental impact on any of these areas. Example: Part of the golf course is within Zone 4. To maintain the credibility of a golf course requires a minimum of nine holes. If the credibility of the course is to be retained,	There is no development contemplated for the areas not designated within a zone. Two golf course holes will be affected by the development in Zone A (formerly Zones 3 and 4). These two holes will be relocated closer to the Scott Building for the convenience of the AFRH residents.

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			where will the two dislocated holes be moved and what will be the environmental impact of this construction?	
91.	2.0/General	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	Retention of all of the existing mature trees in the historic character areas are particularly essential for historic-preservation purposes. All development alternatives must be crafted in such a way as to preserve the mature trees.	As the Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts to resources including the mature trees on the facility.
92.	2.0/General	Barreto, Carlos and Sandra Kenngott, Christine	Other true alternatives to the proposed development plan must be explored. The four "alternatives" listed in the DEIS are not really different from one	AFRH has assessed a range of alternatives which are consistent with the requirements of the National Defense Authorization Act of 2002 and the

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		McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby Stephens, Arlus J.	another, but merely slight variations on a single theme. More effort should be made to provide true alternatives with a variety of financial and real estate options to solve the underlying concern namely the budget of the AFRH.	purpose and objectives of this proposed action.
93.	2.0/General	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	The location of a park in Zone 6 in the AFRH EIS would be easily accessible to dense development in neighboring Colombia Heights and to planned dense residential development along Georgia Avenue, as well as dense development planned for the rest of the AFRH site. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northwest and northeast D.C. Among the alternatives, the DEIS has	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property.

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			not considered alternatives that would provide significant parkland for the neighborhood to the west of AFRH. As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of Soldier's Home were developed in the early 1900s around the presence of the Soldier's Home as open space.	
94.	2.0/General	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet	For parcels, or portions of parcels, which have historic significance or character, the development plan must spare them from development, possibly including through alternatives such as land trusts or sale of certain parcels, or portions, for use a parkland. Both options should be added as viable alternatives that allow for revenue but also conservation.	The AFRH understands the importance of the historic value of the entire AFRH-W campus. As the Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts to resources including the historic character of the site. The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the

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		Wahl, Abby Stephens, Arlus J.		property.
95.	2.0/General	Brown, Rebecca	I strongly feel that there are alternatives not yet considered for receiving the finances needed. Other than acquiring funds directly from the US Congress, there are options for retaining greenspace. Please see the http://www.lta.org/conserve/options.htm for information on conservation easements.	Conservation easements would not generate the level of income needed to sustain the AFRH Trust Fund and viability of the Home.
96.	2.0/General	Brown, Rebecca	I am extremely supportive of opening the property for access to the community. The fences and barbed wire around the land is not only unfriendly and eyesore, it fosters neighborhood discontent. To have this land so close but inaccessible is a huge disservice to the community. Community gardens, playgrounds and walking trails would	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property.

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			increase the goodwill between the neighbors and the AFRH.	
97.	2.0/General	Brown, Rebecca	If development is indeed needed, I would welcome environmentally friendly green buildings with thoughtfulness of the viewsheds and keeping as much open space as possible.	See response to Comment #25. AFRH will seek developers who place emphasis on low-impact development and environmental sensitivity, including the utilization of tools such as LEEDs. Under the Master Plan Alternatives studied in the EIS, approximately 182 to 188 acres (or 67 to 70 percent) of the AFRH-W would remain in open space.
98.	2.0/General	Carstensen, James	We examined the plan for this land drawn up by a few executives and consultants. We don't see anything in the document that talks about national parks. We don't see anything in reference to recreational trails or recreational areas or even parks for the performing arts like the Virginia's Wolf Trap or Chicago's Ravinia. We don't see the talk of the	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property. Recreational uses, even where user fees are charged, would not generate adequate revenue to meet the long-term needs of the AFRH. Under the Master Plan Alternatives

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			need to preserve open space for the retired soldiers, the entire community of Washington, and the nation.	studied in the EIS, approximately 182 to 188 acres (or 67 to 70 percent) of the AFRH-W would remain in open space
99.	2.0/General	Crandall, Bill	Any development should strive to preserve a reasonable amount of managed green space that is accessible to the public.	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property.
100.	2.0/General	District of Columbia Historic Preservation Office	Despite the bulk proposed, the proposed uses and the general development zone locations are likely workable. But the fact that the EIS alternatives range from a no-build option to options in excess of six million square feet of new construction suggests that there are alternatives in between – and consideration of all alternatives to avoid or minimize adverse effects is the intent of Section 106.	The AFRH assessed a range of alternatives that would meet the needs of the Home and the purpose and objectives of this proposed action.
101.	2.0/General	George, Michael	I'm a home resident and I'm against	Use of the AFRH-W for a cemetery

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			getting rid of our land. They tell us it's for the trust fund. Nobody ever sees this trust fund. If they want to do something with the land make a national cemetery out of it. If they got to take it from us make it a cemetery for the Soldiers Home. They're running out of cemeteries. That will work.	would not generate adequate revenue to meet the long-term needs of the AFRH.
102.	2.0/General	Glance, Jason Kenngott, Christine McGilvray, Andrew	The AFRH needs money, but the Washington DC campus is not operating at full capacity. In order to rectify this, the current residents of the AFRH in Gulfport should be relocated to Washington and the entire Gulfport campus should be sold for development. The historical and environmental value of the Washington DC campus clearly makes it the asset to preserve. The historical value of the Gulfport campus is negligible, but its commercial value is	The AFRH-Gulfport provides a critical resource for housing retired military personnel in the southeast region of the U.S. While this site is temporarily not operational due to damages it sustained as a result of Hurricane Katrina, the Gulfport facility is expected to be operational again. AFRH is not considering a disposition of this asset.

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			great ("The Mississippi Gulf Coast region boasts some of the finest beaches, fishing, casinos, restaurants, resorts, entertainment, shopping, and championship golf courses in the southeast United States." -- AFRH web site). Liquidation of the Gulfport campus should therefore yield considerable revenue.	
103.	2.0/General	Hafvenstein, Lauri	Any plan to alter the Armed Forces Retirement home property must include a provision to preserve the natural beauty and restful, restorative nature of the landscape and its views. This is, according to the Deputy General Counsel for the National Trust for Historic Preservation “integral to the Monument’s historic context and interpretation”.	Design guidelines which will be included in the Master Plan will be written to emphasize the importance of the historic landscape and other resources. The building heights in each of the alternatives have been established with the sites viewsheds in mind.
104.	2.0/General	Hafvenstein, Lauri	Long-time residents here talk of	Resident gardens will not be eliminated

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			anticipating the progress of the gardens tended by residents of the AFRH each summer, a ritual that dates back some 150 years. Sadly, it is all too easy to imagine how different the neighborhood will be if those historic gardens are replaced by high-rise buildings.	under any of the Master Plan Alternatives. The gardens may be relocated closer to the AFRH-W residences so that they are more accessible to the Home's elderly residents.
105.	2.0/General	Hafvenstein, Lauri	Why are there only two alternatives—no development or large-scale development with buildings up to eight stories completely surrounding the periphery of the property?	The AFRH assessed a range of alternatives that would meet the needs of the Home and the purpose and objectives of this proposed action. The No-Action Alternative has been studied, as required by NEPA, to provide a baseline for assessing the magnitude of environmental effects of the action alternatives.
106.	2.0/General	Hafvenstein, Lauri	Has there been any exploration of alternatives, such as a land swap or partial development of areas that are less historically significant?	A land swap is not consistent with the requirements of the National Defense Authorization Act. The AFRH understands the importance of the

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				historic value of the AFRH-W, and as the Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts to resources including the areas that are historically significant.
107.	2.0/General	Hafvenstein, Lauri	Has there been any consideration given to opening some of the property to public access for parks and recreation?	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property.
108.	2.0/General	Hamilton, Heather B.	I am extremely disturbed that there is no plan to preserve community green space. Any community development, particularly when it is getting rid of what little green space we have in our community, should be mandated to maintain at least 10% of the space as parkland accessible to the community. It's bad enough that the children at Park	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property.

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			View Elementary, a few blocks south, have only a concrete lot to play in; it would be a travesty if the children of the neighborhood were not provided with a real park when it would be so easy to maintain some of the lovely trees and open space.	
109.	2.0/General	Hoffman, Sandra	Among the alternatives that are considered, like prior speakers, I'd like to urge the Armed Forces Retirement Home to work with the DC government and federal government to find alternatives for funding or for land use including possibly exchanges of land with other federal agencies where perhaps you can find a site that would be more appropriate for development and then perhaps this can become a park. Maybe that's a way to work things out.	A land swap is not consistent with the requirements of the National Defense Authorization Act. AFRH needs a stable source of revenue in the Trust Fund to adjust to variations in operation and capital expenses. In 2004, AFRH generated $92 million in revenues from military fines and forfeitures, monthly payroll deductions from enlisted military personnel, resident fees, and interest earned by the Fund and donations. The fines and forfeitures have increased due to the war in Iraq, but cannot be

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				sustained as a viable long-term source of revenue. The 1% interest earned by the Fund and the payroll deductions from enlisted military personnel cannot be increased without an act of Congress. In 2004, the operating expenses for the Home were $38 million net and this year with the increase of the site population by approximately 50% with the additional residents from Gulfport those expenses are expected to be higher. Without an aggressive strategy to augment its revenue stream and built its Trust Fund, AFRH's financial stability is bleak as the fund balance will get depleted to pay for operating and capital expenses.
110.	2.0/General	Kenngott, Christine	Option 1, do nothing, would be my choice. But since that is not financially	The AFRH is continuing to assess ways to allow public access onto portions of

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			viable, there should be an option that provides something for the community. There should be a park or public green space for people, not just 100% development for maximum profit. These plans do not take into consideration the local community, but are designed to benefit outside developers most.	the AFRH-W, including access to the ponds on the southwest portion of the property.
111.	2.0/General	McFadden, Marion Mollegen	I request that the development contain a large green space buffer zone between the edge of the property and any housing, commercial, or embassy buildings. Since the neighborhood has no other parks (other than the small Parkview baseball field at Princeton and Warder), the view is precious. However, the large iron gate separating the AFRH from the neighborhood has always been a source of frustration; we can see the beautiful grounds, but only through bars.	Design guidelines which will be included in the Master Plan will be written to emphasize the importance of green space within the development. The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property. Under the Master Plan Alternatives studied in the EIS, approximately 182 to 188 acres (or 67 to 70 percent) of the AFRH-W would

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			My mother used to tell stories of family picnics at the Old Soldiers Home in the 1940s. While I realize that the park grounds will not be wholly opened to the public, I believe the development creates a positive opportunity for permitting the local community to better enjoy the campus. By creating open space accessible to the public between Park Place Northwest and the development, down past the duck pond, the project could accomplish its financial goals while buffering the noise and traffic dangers and adding sorely needed, accessible greenspace.	remain in open space.
112.	2.0/General	MedStar/ Washington Hospital Center	This City has limited large tracts of land for development. When large parcels become available for use, a variety of possibilities should be considered that maximize the benefits to the community,	Comment noted.

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			both financially and substantively. Because of the character of the land use south of Irving, medical, education, research, and other related institutional uses should be considered.	
113.	2.0/General	Murphy, J. Dahl	Think our congress and lawmakers should support our retired troops. That the AFRH is low on money is inconceivable. Suggest congress put the home's support in the US yearly budget. Do not support development of any part of the home and therefore want alternative #1 to take affect. Do not touch this historic site for the gains of developers and real estate moguls.	Comment noted.
114.	2.0/General	National Trust for Historic Preservation	The National Trust is particularly concerned about the limited range of alternatives explored in the DEIS. Because of the potential impacts that would occur as a result of the high level	The AFRH assessed a range of alternatives that would meet the long-term financial needs of the Home. The AFRH understands the importance of the historic value of the AFRH-W. As the

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			of development currently proposed in the DEIS alternatives, we strongly urge the AFRH to develop additional alternatives that would involve less construction in order to reduce the adverse impacts on historic resources, as required by 36 C.F.R. §§ 800.6(a) and 800.1(a). For example, using Figure 4-1 as a starting point, DEIS at 4-37, we recommend developing alternatives that would reduce the overlap between Development Zones and Intact Character Areas.	Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts to resources including the historic character of the site.
115.	2.0/General	O'Brien, Bob	We seem to have four proposals on the agenda, all of which have been developed with little or no input by the residents. As I see it, this meeting and the previous one on the same subject only summarize the proposals being submitted to EPA. At the first meeting I	See response to comment #54. The AFRH-W does not have a preferred alternative. All of the Master Plan Alternatives were assessed in the Draft EIS to provide a thorough comparison of the environmental impacts associated with each alternative.

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			attempted to have it clarified as to which proposal the administration was favoring or was more in favor of than others. I was not successful on that. But I find it difficult to believe that they do not have a distinct opinion about which of these plans should be the one to be accepted.	
116.	2.0/General	Patykewich, Leslie	Consider and address additional options: non development, more conservative development options and combinations of several development and nondevelopment options	The AFRH assessed a range of alternatives that would meet the long-term financial needs of the Home and the purpose and objectives of this proposed action.
117.	2.0/General	Quick, George	The suggested plan to destroy the Home is ridiculous. The proposed purpose of the plan is to raise money to pump up the AFRH fund. This is neither desirable nor necessary. There would be no shortage of funds if non-disabled veterans were no longer accepted as residents. There would be no shortage	Comment noted.

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			of funds if a reasonable users fee were assessed each resident.	
118.	2.0/General	Swanson, Lisa	While the draft EIS appears to consider a range of options for the effects of developing spaces on the AFRH-W, the potential development options proposed to generate revenue does not include the potential of opening this middle-city green space to the public without further extensive development. The current AFRH-W website proudly promotes "a city within a city" with amenities that the Petworth, Park View and other adjacent neighborhoods have been lacking for years: an auditorium for films and live entertainment, a golf course and driving range, stocked fish ponds, community garden space, a bar and restaurant or space for a large catered event, a bowling alley, craft	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property.

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			studios, magnificent and modest buildings of historical interest, and superb vistas within a landscape relatively untouched for almost two centuries. With sound management and promotion, by opening access gates to the public, all of these amenities could provide additional commercial and recreational resources for the surrounding residential neighborhoods, apart from the larger-scale development planned at Georgia Avenue/New Hampshire Avenue, with none of the short- or long-term adverse effects.	
119.	2.0/General	Taylor, Joseph	Recommendations: Sell off the Le Guard Medical Facility. Drop the 60 year old age limit. Level fees so that all Residents pay the same. Reduce medical staff. Cut the current staff level even more. Many	See response to comment #45. Appropriate levels of operational changes have been made at the Home over the last several years to improve the financial status of the facility.

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			residents would rent space for storage and we have lots of empty space.	
120.	2.0/General	The Potomac Conservancy	Creating an urban parkland would offer residents and the public a respite from the congestion of the metropolitan area. The unique historical nature of AFRH-W and its monuments would draw citizens to the area. The federal land converted to open space would then be available to the general public. The residents of AFRH-W would also receive physical and mental benefits by use of the open space. The retention of open space would also maintain the scenic viewsheds of the historical buildings and the greenspace for the residents and neighbors. Organizations abound who can aid AFRH-W in creating an urban park.	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property. The development zones shown in the Master Plan Alternatives include open space which will be designed to enhance the AFRH-W campus.
121.	2.0/General	The Potomac	The Potomac Conservancy recommends	The AFRH is continuing to assess ways

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		Conservancy	consideration of additional alternatives that incorporated a mix of uses, public open space, and historic preservation. The Potomac Conservancy advocated a mixed-use development that provides some community open space, particularly saving the community garden. This proposal would mitigate the environmental impacts from the DEIS alternatives.	to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property. Resident gardens will not be eliminated under any of the Master Plan Alternatives. The gardens may be relocated closer to the AFRH-W residences so that they are more accessible to the Home's elderly residents.
122.	2.0/General	The Potomac Conservancy	The sale of the land to developers would be a quick fix to a long-term problem. The sale is a one-time event and may not solve AFRH-W's financial difficulties. A more sustainable long-term solution needs to be addressed. The environment, cultural, and historic negative impacts resulting from	Comment noted.

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			development of the land outweigh the sale and the resulting cash inflow to AFRH-W.	
123.	2.0/General	Tubman, Michael	Nor does the draft EIS afford any opportunities for greater public access to green areas. On p. 3-17, the draft EIS identifies the need for more public parks and green spaces as part of the land use plan of The Comprehensive Plan for the National Capital. Later, on p. 4-23, the draft EIS concludes that Master Plan Alternatives would "conserve open space on the site," but it does not include any opportunity for public access to this open space. On p. 4-38, the draft EIS acknowledges that the use of the Soldier Home as public parkland is compatible with the traditional residential neighborhoods surrounding it. I would feel more comfortable supporting any of	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property.

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			the Master Plan Alternatives if some public access was given to the existing green areas within the Soldiers Home property, thereby making the Master Plan Alternatives consistent with the stated goals of the Comprehensive Plan.	
124.	2.0/General	Valenti, Cliff	Other alternatives to generating revenue for the Old Soldiers Home need to be discussed. Our Federal Government has the responsibility to make sure our soldiers are adequately funded in their retirement. Giving up their gardens and green space or their prescription drugs should not even be an issue. Granted, this proposal is the easiest out for the financial woes of the AFRH, but it's a band-aid.	AFRH has considered alternatives allowed under current law to provide the additional revenues needed for the home.
125.	2.1	AFRH Master Plan Committee	Chapter 2, page 2-3, figure 2-1 Why is the Sheridan Building included in Development Zone 1?	The AFRH Zone (formerly Zones 1 and 2), totaling approximately 56 acres, is preserved for development to be

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				completed primarily by or on behalf of AFRH Development. No major changes to the Sheridan Building are proposed as part of the Master Plan.
126.	2.1	AFRH Master Plan Committee	Chapter 2, page 2-4, Zone 1 Zone 1 is designated for institutional uses compatible with the AFRH-W operations…. In detail, please define and explain the institutional uses?	See response to comment # 125. Institutional uses in the AFRH Zone (formerly Zones 1 and 2) would consist of facilities that would directly serve the residents of the AFRH-W or compatible uses such as educational facilities.
127.	2.1	District of Columbia Department of Housing and Community Development	Dense new institutional and commercial uses that generate a great deal of traffic should be concentrated and focused in Development Zone 3 established in the Master Plan. North Capitol Street and the existing North Capitol Street entrance have more capacity to be able to accommodate the traffic that these new institutional/commercial uses will generate.	Comment noted.

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			Development of proposed new medical uses should be concentrated on the Development Zone 4 located on Irving Street directly adjacent to the existing hospital complexes located south of Irving Street NW. Traffic generated from these new medical uses should enter at a new entrance located at the existing First Street and Irving Street intersection that currently serves traffic from the hospital complexes south of Irving Street.	
128.	2.1.2	Hamilton, Heather B.	I strongly oppose the proposal for retail shops on parcel 6. Retail shops will only make the streets between the developed parcel and Georgia Avenue a corridor for additional foot and automobile traffic, and therefore drug traffic, which will increase the violence level in our already-violent neighborhood. By the	See response to comment # 37. Development in Zones B and C (formerly Zones 5 and 6) would be undertaken in later phases if needed to meet the Home's financial needs.

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			time that the new development is completed, the shops at the Georgia Avenue metro, only 3 blocks away, will have been completed. There is no need to add additional retail.	
129.	2.1.2 and 2.1.3	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby Stephens, Arlus J.	The DEIS mentions any project being in keeping with the neighborhood, but that standard does not actually appear to be consistently applied in the document. That error must be corrected. For example, alternatives 2 and 3A suggest development in Zone 6 that is not at all in keeping with the adjacent neighborhood's architecture. The existing neighborhood is comprised entirely of rowhouse architecture, with a maximum of three stories in height.	See response to comment # 37. Residential development in Zone C (formerly Zone 6) would be two to three stories in height in keeping with the Parkview and Petworth neighborhoods. The only place a building may be taller is in the vicinity of the AFRH-W entrance at the end of Illinois Avenue.
130.	2.1.2 and 2.1.3	Brown, Rebecca	I am thoroughly against more medical buildings in zone 5. It would add no	Comment noted.

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			needed services to the immediate residential community.	
131.	2.1.2, 2.1.3, 2.1.4	District of Columbia Department of Housing and Community Development	Residential uses of a scale compatible with the low-rise townhouse development in the adjacent Park Place and Petworth neighborhoods should be located in the Development Zones 5 and 6 identified in the Master Plan. The existing Park Place and Rock Creek Church road streets are both rather narrow and small scale streets. The traffic generated by new townhouse scale residential development can be more easily handled on Park Place and Rock Creek Church road as they are presently configured.	Comment noted.
132.	2.1.2, 2.1.3, 2.1.4	District of Columbia Department of Housing and	Particular attention should be paid to the details of the residential developments to be constructed around (to the north and south of) the two large fishing ponds	Comment noted.

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		Community Development	located at Park Place and Irving in the southwest corner of the Campus. These two ponds have some of the most intact undisturbed landscaping on the entire AFRH Campus. The existing landscaped character of these ponds should be respected and preserved to the maximum extent possible by the new residential developments that will be built next to them.	
133.	2.1.2, 2.1.3, and 2.1.4	Brown, Rebecca	If new residences are added, I would strongly advocate for them to be built with a similar design to the current character of the neighborhood and to include some low-impact commerce. While Georgia Avenue is slated for improvement, currently there are few services (shops, restaurants, etc) in the area.	See response to comment # 37. Residential development in Zone C (formerly Zone 6) would be two to three stories in height in keeping with the Parkview and Petworth neighborhoods. AFRH is continuing to work with the community and local agencies on the creation of design criteria which will guide all phases of development on the site.

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134.	2.1.2, 2.1.3, and 2.1.4	Carstensen, James	Simply stated - I am opposed to any and all additional development of zone 6 along Park Place, NW in the AFRH proposal. Any additional development should be conducted at the already developed areas along North Capitol Street and Michigan Avenue.	Comment noted. The AFRH plans to solicit offers for development of Zone A (formerly Zones 3 and 4) in the immediate future. Development in Zones B and C (formerly Zones 5 and 6) would be undertaken in later phases if needed to meet the Home's financial needs.
135.	2.1.2, 2.1.3, and 2.1.4	Department of the Interior	The Department believes there is a need to develop an alternative that specifically address the park and open space value and contribution to the City as a whole. In our judgment, the areas identified as 5 and 6 should be considered critical components of an overall park, open space, and landscape component of this retirement home and the city as well. To allow these two areas to be developed for either housing or for embassies would excessively hem in the current	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property. Development in Zones B and C (formerly Zones 5 and 6) would be undertaken in later phases if needed to meet the Home's financial needs.

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			and further use of the golf course and ponds to a point that their future would be threatened. We recommend that a new alternative be developed which would create a public park including the golf course. In order to relieve AFRH-W from the maintenance costs, consideration should also be given to transferring the new park to the District of Columbia or the National Park Service for management.	
136.	2.1.2, 2.1.3, and 2.1.4	Hamilton, Heather B.	Any residential or institutional/embassy development should be required to provide parking for each resident/employee.	In order to meet the National Capital Planning Commission's goal to reduce the dependency of vehicles within the District through minimization of parking, one parking space for each resident or employee is not feasible.
137.	2.1.2, 2.1.3, and 2.1.4	McFadden, Marion Mollegen	Also, unlike some of my neighbors, I request that if any housing is created, the AFRH require that at least 15% of the	The type of residential housing including income level will be determined by the market and is not prescribed in the

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			units be affordable to low- to moderate-income families. The rapid gentrification of Parkview and Petworth have priced out many potential buyers and renters who grew up in the area and would like homes of their own. I request that preference for these units be given to long term DC residents.	Master Plan. The AFRH will assess proposals submitted through a formal Request for Proposal process.
138.	2.1.2, 2.1.3, and 2.1.4	Tubman, Michael	In many of the alternatives (2,3A, 4), the EIS proposes to use zone 6 for residential development with some retail space as well. In Alternative 2, the EIS refers to areas "compatible with the residential development west of Rock Creek Church Road." It should be noted that compatibility with the surrounding neighborhoods would require open streets. Gated neighborhoods would not be compatible with the existing openness and community atmosphere of the	The Master Plan will include a new secured perimeter that will maintain the security of AFRH-W operations for its residents. Development Zones A, B, and C (formerly Zones 3, 4, 5, and 6) would be open to the public.

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			surrounding Park View and Petworth neighborhoods. Moreover, current residents should have access to any new retail developments.	
139.	2.1.3	Friesel, Larry	Proposal #3B seems to be the best alternative in my opinion. The historic use of this land for more than 150 years should be persevered, and of the utmost thought in changes or planning for the land.	Comment noted.
140.	2.1.3	NCPC	With this primary objective in mind, the Commission staff review of the DEIS finds either alternative 3A or 3B appear to best achieve that objective while still maintaining significant and important qualities of the existing facility campus	Comment noted.
141.	2.1.3	Tubman, Michael	Alternative 3B also holds potential in its suggestion for the development of an embassy in zone 6. This could be a positive addition to the neighborhood,	According to the DC Metropolitan Police, additional police patrols would not be required for embassies.

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			offering the neighborhood prestige and potential commercial customers of local shops. However, p. 4-22 recognizes a need for increased police presence only in the event of demonstrations. The FEIS should recognize that foreign missions would require a greater constant police presence both at the site and in the surrounding neighborhood.	
142.	2.1.3	Valenti, Cliff	Every option, except the "no action" option, is huge in scale, even 3B, which shouldn't even be on the table since the State Department has clearly stated they have no interest in putting Embassies and such at the sight.	Embassies were considered in conformance with the Foreign Missions and International Organizations element of the Comprehensive Plan for the National Capital.
143.	2.2	Patykewich, Leslie	I am particularly concerned that the financing alternatives eliminated from the detailed study (section 2.2, p. 2-15) were not given full consideration and I am requesting that they be revisited. In	See response to comment # 45. The AFRH assessed a range of alternatives that would meet the needs of the Home and the purpose and objectives of this proposed action. AFRH needs a stable

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			addition, I would also like to encourage the Armed Forces Retirement Home to examine other options that may yet to have been considered. Among those mentioned at the June 22 meeting were: requesting U.S. Congress to create a line item and support for recurrent funding; examining opportunities to exchange land with the DC government; environmental easements; establishing a land trust, etc.	source of revenue in the Trust Fund to adjust to variations in operation and capital expenses. In 2004, AFRH generated $92 million in revenues from military fines and forfeitures, monthly payroll deductions from enlisted military personnel, resident fees, and interest earned by the Fund and donations. The fines and forfeitures have increased due to the war in Iraq, but cannot be sustained as a viable long-term source of revenue. The 1% interest earned by the Fund and the payroll deductions from enlisted military personnel cannot be increased without an act of Congress. In 2004, the operating expenses for the Home were $38 million net and this year with the increase of the site population by approximately 50% with the additional residents from Gulfport those

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				expenses are expected to be higher. Without an aggressive strategy to augment its revenue stream and built its Trust Fund, AFRH's financial stability is bleak as the fund balance will get depleted to pay for operating and capital expenses.
144.	2.2	The Potomac Conservancy	The Potomac Conservancy strongly suggests that the AFRH-W consider other alternatives to the sale or lease of the land to developers in order to create a more long-term, environmentally-sound, sustainable solution to the economic difficulties. We question why other alternatives to land development are not seriously analyzed in the DEIS, instead of merely being included in a quick paragraph mentioning other suggested sources of income. These alternatives do not appear to be fully	The alternatives dismissed, as described in Section 2.2 of the EIS, would not generate sufficient revenue for the long-term needs of the AFRH.

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			analyzed.	
145.	2.3	AFRH Master Plan Committee	Chapter 2, page 2-18, Economy, Employment, and Income Under the column master Plan Alternatives, the first paragraph appears to be in error. Question: If this paragraph is not in error, what is the rationale supporting the statement?	The Draft EIS text was in error. The first paragraph under Master Plan Alternatives has been deleted in the Final EIS.
146.	2.3	AFRH Master Plan Committee	Chapter 2, page 2-19, Historic Properties Under the heading Master plan Alternatives, the indication is that the alternatives 2 through 4 will have direct long term adverse impacts. The properties and structures contained within the confines of the AFRH-W have a broad and resonating effect on and from the military customs, traditions and culture.	Reuse opportunities are being considered for approximately nine structures in Zone A (formerly Zones 3 and 4). Another reuse opportunity includes, but is not limited to, the Grant Building and the Forwood Building. Most of the historic buildings onsite will be preserved with implementation of the Master Plan. In addition, as the Master Plan is implemented, the AFRH will make every effort to further avoid and

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			Question: What specific reuse is planned within the Master Plan? What mitigation measures are possible to preserve the historic culture of the AFRH-W for future military generations?	minimize impacts to the historic character of the site.
147.	2.3	AFRH Master Plan Committee	Chapter 2, page 2-20, Air Quality Under the Master Plan alternatives discuss causes of both long term and short term adverse impacts to air quality. What mitigating measures and/or contingency plans are in place to cope with AFRH-W residents who currently have respiratory problems? What system will be in place to measure the net result of this adverse impact on the incidences of respiratory ailments (i.e. COPD) on AFRH-W residents?	Two types of impacts to air quality can affect human health. First construction activities can create fugitive dust from demolition, site grading, construction, wind erosion, and vehicular activities. These impacts can be mitigated through emission controls on construction equipment and covering/wetting exposed soils to reduce fugitive dust. The AFRH will require contractors involved in onsite construction to take these measures to minimize impacts on air quality.
148.	3.1.1	Arguto, William	Page 3-35, Character Area 5: Pasture,	There are no prime or unique farmland

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		EPA	states that "The Pasture represents the natural agricultural landscape that was once vitally important to the self-sustaining farming activities on the site and illustrates the 19th century pastoral appearance of its once active farming lands." Prime and unique farmland impacted by the project should be delineated regardless of the current state of cultivation. These efforts should be coordinated with the National Resources Conservation Service. Impacts to prime and unique farmland should be avoided. However, if this is not possible, the Final EIS should explain the implications of developing the prime and unique agricultural land with respect to the Farmland Protection Policy Act as well as describe the mitigation measures for those impacts.	soils, as defined by the Farmland Protection Policy Act, located on the AFRH.

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149.	3.1.2	Arguto, William EPA	Page 3-3 of the Wetlands Section states that the largest drainage area on the AFRH-W, approximately 105 acres, drains into two ponds in the southwest corner of the site via a paved flume. The second largest drainage area, approximately 65 acres, flows north to south through the center of the campus via a paved flume and storm sewers. "Prior to any disturbance of these areas, a Jurisdictional Determination (JD) from the USACE would be needed to determine if these features are considered waters of the U.S. and therfore under the USACE's jurisdiction."	Comment noted. The AFRH will seek a Jurisdictional Determination prior to undertaking activities which may impact Waters of the U.S.
150.	3.1.3	Arguto, William EPA	The DEIS states that portions of forested areas, mature trees, and meadow habitats would be replaced with developed areas. The Final EIS should provide a complete	Information on terrestrial plants and animals is included in the EIS. Under the Master Plan Alternatives studied in the EIS, approximately 182 to 188 acres

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			description of the terrestrial habitat resources in the study area. Complete species lists for mammals, birds, amphibians, reptiles, and plants present in the study area should be provided. The composition and characteristics of each community type should be summarized and the functions and total acreage indicated. In addition, the species should be mapped relative to habitat locations and species density.	(67 to 70 percent) of the AFRH-W would remain in open space. Therefore the site's carrying capacity for wildlife will not be substantially altered by the Master Plan Alternatives.
151.	3.1.3	Arguto, William EPA	Although it was noted on page 3-7 that crappie, bass, and catfish are species found in the two fishing ponds, the fish and benthic invertebrates in the ponds within the study area should be surveyed. An analysis of both fish and benthic communities should be conducted to determine the quality and function of the aquatic biota. The	Best Management Practices for stormwater management will be utilized in all new development to ensure quality and quantity control of stormwater. Quality control measures will be designed to ensure that water quality in the fishing ponds is not impaired by the proposed development.

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			purpose of the survey is: 1) to detect impairment of aquatic biota, 2) to assess the relative severity of the impairment, 3) to prioritize sites for more intensive evaluations, and 4) to define baseline conditions and documenting recovery from impairment following mitigation actions. The loss of forested areas and open spaces combined with an increase in impervious surfaces lends itself to more pollutants entering the ponds. Reduced nutrients to streams, affects food supply for fish, etc. Therefore, specific mitigation measures must be outlined to alleviate adverse effects to the aquatic biota present in the ponds.	
152.	3.2.1	AFRH Master Plan Committee	Chapter 3, page 3-11, Table 3-2 On page 3-9 first paragraph "The AFRH-W is located within Census Tract	Demographic information on the AFRH-W residents has been added to Section 3.2.1 and impacts to this population have

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			23.02” There should be sufficient demographic data available at AFRH-W to treat the population as a separate entity for the purposes of this study. (1) How would the same data (i.e. Population, Race, Median Household Income, Poverty Status) appear if AFRH-W was displayed separately as a separate column to facilitate a closer observation of the population most affected by the proposed Master Plan? (2) Why were the Social Characteristics and Economic Characteristics not included as a distinct table for tract 23.02 (and separately for the AFRH-W to provide a more complete and accurate picture of the population most affected by the proposed Master Plan?	been expanded in Section 4.2.1.

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153. .	3.2.1 and 4.2.1	Felder, Charles	Why under the EIS, are the residents of the AFRH-W not considered a distinct, unique and viable population affected by all environmental issues; or as a local community; or as a minority population to be considered under Executive order #12898?	Demographic information on the AFRH-W residents has been added to Section 3.2.1 and impacts to this population have been expanded in Section 4.2.1.
154. 4	3.3	Arguto, William EPA	As indicated in the DEIS, the AFRH-W is a National Register-Eligible Historic District. The master plan alternatives would have direct, long-term, major, adverse impacts to cultural resources and the historic district. The pristine areas that characterize the AFRH-W area and that are associated with and represent historical significance will be lost due to the proposed development. Additionally, new construction would likely alter the historic context of individual buildings and building	Figure 3-8 provides a map of historic resources outside of the AFRH-W.

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			groups. Cultural landscape features would be disrupted or lost entirely. In addition, the proposed alternatives could potentially affect historic properties outside of the AFRH-W. The historic properties outside of the AFRH-W are discussed within the DEIS. However, a map depicting their location in relation to the AFRH-W would be helpful in determining their proximity to cultural resources within the AFRH-W site. Although a Programmatic Agreement is being developed that will identify mitigation measures as well as design guidelines for the defined character areas, the loss of cultural areas is great and permanent. The DEIS does not propose scaling down the proposed developed areas to retain some (or all) of	

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			the intact character areas nor to preserve the open space/meadows or the historic cultural landscape. Thus, of the alternatives proposed, there is no significant difference in the degree of impact.	
155.	3.3.3	Larson, Michael Maready, Gerald	The Area of Potential Effect as presented in the DEIS appears to be too small to adequately determine the effect of the proposed master plan upon the National Register listed and eligible sites in the vicinity. The methodology used to determine the boundaries of the APE is neither described nor justified in the text of the DEIS. The boundaries of the APE should be expanded to include all of Petworth, and a new determination of effect should be prepared to reflect the expanded APE. In order for the public to fully	The Area of Potential Effect (APE) was delineated to include all resources that could be affected directly by construction or indirectly visually, by noise, or other impacts such as traffic. The DC Historic Preservation Office has concurred with the APE. The AFRH-W Resource Identification and Evaluation is available at the AFRH and at the DC Historic Preservation Office.

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			understand the implications of the proposed master plan, the **full text** of the *AFRH-W Resource Identification and Evaluation* should be included in the text of the Final EIS, in one of the appendices at the very least.	
156.	3.6	AFRH Master Plan Committee	Chapter 3, page 3-52, 53, Noise - The last paragraph describes the "land uses near the AFRH" as Category B. Category B is described as "moderately sensitive land uses, including residents, churches and hospitals". This EIS has given no consideration to the environmental consequences on the specific AFRH-W population whose average age is 77 years and who reside in assisted care and long term care nursing home environment. What would be the Noise Level Results (Table 3-10) if the area within the	Land Use Category A is land for which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to serve its intended purpose. Existing noise levels in the interior of the AFRH-W (sampling points 4 and 7) are below the levels noise abatement levels for Category A as shown in Table 3-9. The Master Plan Alternatives would not result in noise levels above Category A at these same points.

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			apartments of the AFRH-W were designated as Activity Category A rather than Category B which is the current category assignment for the "land uses near the AFRH-W"?	
157.	3.8	DC Office of Planning	AFRH-W has considerable issues with regard to hazardous waste and corollary contamination. First and foremost, the AFRH-W currently does not have an operations and maintenance (O & M) program in place to manage wastes and other environmental contaminants. Secondly, it is not currently identified as a RCRA hazardous waste generator in the draft EIS even though EHA has it *listed* with an EPA ID number. Furthermore, the following contaminants or areas of concern have been identified with the past and current operation of the	The AFRH is committed to remediation of environmental conditions within the AFRH-W and has taken steps to cleanup known sources of contamination. Based on research for the Phase I and Phase II Environmental Site Assessment, there is no evidence to suggest that unexploded ordinance or medical waste are located on the grounds of the AFRH-W.

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			AFRH-W: - 3 out of service USTs (underground storage tanks) - 3 abandoned USTs near Buildings 46 and 76 - 3 active USTs associated with Buildings 52, 56, and 64 storing diesel fuel for emergency generators - Possible perchchloroethylene ground contamination associated with former laundry in Building 46 - Former hazardous materials/petroleum use areas in Buildings 73, 76, and 77 - Surplus pesticides stored in Building 77. Conceivably, DDT and chlordane could be housed there given the age of the units	

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			- Spent solvents, paint thinners, paint waste, drummed lead paint debris, possible hydraulic fluid - Known asbestos containing materials (ACM) throughout the facility It is also a distant possibility that, given the opening date of the facility (1851), there could be some ordnance issues. Although AFRH-W is neither a fort, nor lies in the "circle of forts" area that comprise much of the formerly-used defense sites (FUDS), it may still be possible to unearth munitions during any required excavations in addition to medical waste and attendant equipment/supplies/bottles, etc. given its pre- and post-Civil war status. As a result, we recommend that an anecdotal review of requisite documents, photographs, etc. be conducted should a	

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			light or heavy geophysical study be contemplated for any ordnance/medical waste debris, etc	
158.	4.0 General	Carpenter, Gracie	Not one of the proposed alternatives will have a "minor" impact on this area. All changes will be very "major" in affecting AFRH-W, being permanent. Traffic into and out of AFRH-W will increase tremendously. I don't believe any roads surrounding AFRH-W can carry the additional cars, i.e., quantity, size, frequency. Sound level testing was not done near the Sheridan Building because of ongoing road work on N. Capitol Street. I think it still needs to be done because even once construction begins on hopefully a parking garage for AFRH-W, the noise level will still be high for those of us who live on that side of AFRH-W. A sound barrier of some	The EIS includes a rigorous analysis of impacts to resources including transportation, transit, and parking. While AFRH-W residents have historically been affected by noise from North Capitol Street, the proposed action will not appreciably affect noise levels after construction is complete. Site landscaping in the new development, including the type of potential trees, is outside the scope of this EIS. No large forested areas would be removed under the Master Plan Alternatives.

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			sort would be on order. But instead of constructing concrete, perhaps tree around the perimeter would work towards reducing noise levels, be aesthetically pleasing to look at, and would also help in making air quality better. Soil erosion is a concern. With the shallow tree root system here, care needs to be taken to perhaps replant trees with stronger root systems, ones that won't blow over with the first strong winds. Forested areas should only be removed minimally. We have fox and deer on the grounds also. Please leave some areas undisturbed.	
159.	4.0 General	Cody, Martin	Add: Section on "Resident Impact" from reduced walking area, grass, flowers, garden elimination, and construction dust, noise of equipment, traffic, CO2, etc.	The impacts described in the EIS are impacts to the "human environment." Therefore, all of the impacts described in the EIS comprise the collective impacts on the AFRH-W community's

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				environment.
160.	4.0/General	AFRH Master Plan Committee	The discussion under the various subheadings within Chapter 4 presents a multitude of mitigation measures. Will the mitigation measures presented in the final copy of the EIS be a required part of any contract entered into with a developer to construct any or all of the planned development zone sites under the Master Plan? Will the mitigation measures presented in the final copy of the EIS be a required part of the final copy of the Master Plan for the AFRH-W?	Following circulation of the Final EIS, the AFRH will issue a Record of Decision. This Record will document all mitigation measure which will be taken as the Master Plan is implemented.
161.	4.0/General	AFRH Master Plan Committee	Chapter 4, page 4-19 first paragraph Under the alternatives, there is a potential increase in population to approximately 7,500 persons. With this extreme in population, as well	The Master Plan will include a new secured perimeter that will maintain the security of AFRH-W operations for its residents. Development Zones A, B, and C (formerly Zones 3, 4, 5, and 6) would

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			as the interim increase in the worker population during any construction period, what specific security measures are to be taken to protect the environment?	be open to the public. Projected increase in population is over the development period of 10 years. The Security and Access Plans in the Draft Master Plan outlines security measures to all Character Areas and addresses needs of AFRH residents. AFRH will include provisions in Development Agreements to ensure the security of the environment and residents.
162.	4.0/General	AFRH Master Plan Committee	"Cumulative Impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking	The impacts described in the EIS are impacts to the "human environment." Therefore, all of the impacts described in the EIS comprise the collective impacts on the AFRH-W community's environment. Additional information on cumulative impacts has been added to the Final EIS.

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			place over a period of time. Question: Will the final copy of the EUS address the issue of cumulative impact of the Master Plan on the immediate confines of the AFRH-W community?	
163.	4.0/General	AFRH Master Plan Committee	Question: What specific base line data will be used or established against which to measure effects of any cumulative impact on the immediate environment and the cultural impact on the resident community?	The impacts described for the No Action Alternative form the baseline against which the impacts of the Master Plan Alternatives are measured.
164.	4.0/General	AFRH Master Plan Committee	When economic, social and natural or physical environments are interrelated then the EIS will discuss all these effects on the human environment. The Master Plan will definitely have an impact on the human environment within the AFRH-W. In what section of the EIS will the	All of the impacts described in Chapter 4, Environmental Consequences, are impacts to the human environment, and thus, are the impacts to the residents of the AFRH-W.

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			Cultural Impact Assessment be completed and included as a part of the final copy of the EIS? What will be the specific measures included within the EIS to evaluate the cultural impact within the AFRH-W resident community?	
165.	4.0/General	AFRH Master Plan Committee	What initiatives are in place or planned to control visitor access to the AFRH-W grounds?	The draft Master Plan contains Security/Access Plans that discuss the security of each of the Character areas on AFRH-W grounds and access to AFRH-W post development of Zones A, B, and C (formerly Zones 3, 4, 5, and 6). The Master Plan will include a new secured perimeter that will maintain the security of AFRH-W operations for its residents. Development Zones A, B, and C would be open to the public.
166.	4.0/General	DC Office of	The impact of future development on surrounding neighborhoods and District	The draft EIS includes a rigorous analysis of impacts to resources

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		Planning	facilities is of utmost concern. Cumulative impacts of all proposed development on the surrounding area should be adequately addressed. Impact analyses should be conducted for transportation, traffic, transit and parking networks, as well as libraries, schools, recreation centers and other services.	including transportation, transit, parking, and community services. Additional information on cumulative impacts has been added to the Final EIS.
167.	4.0/General	Meredith Lathbury Potomac Conservancy	The Potomac Conservancy recommends, in any case, that mitigation and conservation efforts be implemented to preserve the environmental integrity of the area. In order to mitigate the environmental impacts of the current and proposed development, modern techniques need to be implemented. For example, reduction of impervious surfaces will decrease the amount of polluted runoff. In addition, incorporating rain gardens will filter the	See response to comment #6. The AFRH will make every effort to avoid and minimize impacts as the Master Plan is implemented. In addition, AFRH will seek developers who place emphasis on low-impact development and environmental sensitivity. Best Management Practices for stormwater management will be utilized in all new development.

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			polluted runoff from current impervious surfaces which will then help to protect the quality of the fish ponds and channeled streams. Retention of mature trees will improve air quality and protect local fauna. (And also be consistent with National Capitol Planning commission's program to protect older growth trees and overall vegetation). Reducing fertilizer and pesticides and only adding these chemical at certain times on the golf course will ensure increased water quality. The utilization of green building techniques such as green rooftops will help mitigate other negative effects occurring from development. In general, there are an abundance of common sense, environmentally-sound methods to be implemented in order to ensure the	

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			natural integrity of AFRH-W. Creating a model environmentally-healthy redevelopment will demonstrate what a sustainable, low-impact, in-fill development can be.	
168.	4.0/General	Patykewich, Leslie	Environment: It does not appear that the draft EIS sufficiently considered either green development approaches or the cumulative effect of the AFRH development and the already approved nearby development on the community and broader environment. It also appears that traffic and air quality impact were underestimated.	See response to # 39. AFRH will seek developers who place emphasis on low-impact development and environmental sensitivity. The EIS includes a rigorous analysis of impacts to resources using standard professional techniques. Traffic and air quality modeling has been used to predict future conditions under each draft of the Master Plan Alternatives. Additional information on cumulative impacts has been added to the Final EIS.
169.	4.0/General	Stephens, Arlus J.	Both residents of the AFRH and neighbors who live to the west of the	See response to comment #37. The development alternatives

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			Home benefit, much as President Lincoln did when he lived in the Anderson cottage, from the relative calm and quiet provided by the green campus of the Home. The EIS notes that the noise level in the area is that usually found in parks. Area residents enjoy being able to walk past the property and to see its green expanses when looking out their windows or down their streets. In this way, the AFRH has provided area residents with a real source of wealth that improves their quality of life in ways that they could not purchase no matter what their income was. This neighborhood does not seem poor to its residents no matter their income because it does not look like a poor neighborhood. The increased traffic, noise, and loss of green beauty and calm	neighboring the west side of the campus integrate the neighborhood fabric and incorporate open space.

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			will take away something of irreplaceable value in their lives.	
170.	4.0/General	Swanson, Lisa	The EIS does not consider the cumulative effects of slated development at Georgia Avenue/New Hampshire Avenue or the potential development of the Macmillan Sand Filtration site.	Cumulative impacts of development on Georgia Avenue and the McMillan Sand Filtration site were considered in the traffic analysis. Additional information on cumulative impacts has been added to the Final EIS.
171.	4.0/General	Swanson, Lisa	Other statements have addressed the changing but overwhelmingly residential characteristics of the immediate neighborhood. For the purposes of any development within the District of Columbia, the environmental impact considerations must include not only the perimeter neighborhoods, but also the Anacostia and Potomac rivers and the Chesapeake Bay.	The primary impacts to the Anacostia and Potomac Rivers and the Chesapeake Bay would come from untreated and unregulated stormwater runoff from the proposed development. The AFRH is committed to providing adequate stormwater management and using low-impact development techniques to minimize impacts such that there is negligible to no impact to these distant resources.

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172.	4.0/General	Swanson, Lisa	If you look at the map of the District of Columbia this is huge. This is a huge, prominent green space that needs a lot of attention. Anything that happens here will have a lot of effect not just on the perimeter neighborhood, on the Chesapeake Bay, the Potomac River, all of the greater environment that we're not really talking about tonight, so we can't forget about that.	See response to comments #4, #170, #171. Design guidelines which will be included in the Master Plan will be written to emphasize the importance of green space within the development.
173.	4.1	Stephens, Arlus J. Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David	The DEIS does not consider the heat-retention impact that the proposed dramatic replacement of green meadows, lawn and trees with buildings and paved surfaces will have on temperatures in the surrounding area. The dominant green space on the current AFRH campus has a cooling effect that will be radically	Under the Draft Master Plan Alternatives, impervious surfaces on the AFRH-W would increase between 34 and 37 acres. Approximately 182 to 188 acres (or 67 to 70 percent) of the AFRH-W would remain in open space. Because the region surrounding the AFRH is urbanized, the additional impervious

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		Tufu, Adan and Janet Wahl, Abby	altered if heat-retaining buildings, parking lots, and roads are constructed where grass and trees now stand. The increased temperatures will result in higher cooling bills, particularly burdensome for the elderly poor, or an increased frequency of dangerous summer conditions for those who cannot afford air conditioning, again particularly the elderly poor. Increased temperatures will also worsen the impact of the increased automotive exhaust associated with the proposed development by promoting local ground-level ozone formation. It will also have a deleterious effect on those neighbors with respiratory conditions. Similarly, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the	area on the AFRH-W would have a minor effect on air temperature. Impacts to air quality are assessed in Section 4.5 of the EIS. AFRH will seek developers who place emphasis on low-impact development and environmental sensitivity.

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			immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality.	
174.	4.1.2	Arguto, William EPA	Page 4-10 states that "Where possible, the open channel systems on the AFRH-W campus should be utilized to alleviate additional loads on the combined sanitary/stormwater sewer system." However, jurisdiction determination of the channel systems may prevent utilization as a stormwater management system. It is the recommendation of the EPA to discourage the utilization of non-tidal wetland systems for stormwater treatment and management. Numerous studies have shown that siting these facilities in wetlands leads to the degration of aquatic ecosystems by	Comment noted. The AFRH will seek a Jurisdictional Determination prior to undertaking activities which may impact Waters of the U.S.

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			contributing to thermal pollution and downstream warming. Furthermore, an in-stream stormwater management and water quality treatment facility will alter hydrology, and increase erosion and sedimentation rates. Retaining stormwater and changing the natural flow rate will alter the natural level of the water table and change the surrounding wetlands vegetation. Water temperature, habitat composition, and food availability are all directly affected when streamside vegetation is lost. Stormwater management structures in wetlands will not prevent pollutants such as fertilizers, pesticides, spills, sediment, and urban contaminants such as bacteria, heavy metals and petroleum from automotive activities, from entering the surface waters since the structures are	

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			already in the surface water. Wetlands are important components to the aquatic ecosystem that provide flood flow desynchronization, maintenance of water quality, habitat and nutrient uptake functions. EPA's mandates include the preservation of these environmentally significant values and functions.	
175.	4.1.2	Arguto, William EPA	Page 4-13 states, "The stormwater storage requirement for the site can be satisfied with stormwater management ponds, underground storage pipes or concrete structures built in conjunction with quality control structures, or a variety of urban Best Management Practices (BMPs)." Although low impact best management practices such as bioretention facilities, infiltration trenches, dry wells, and rock trench level spreaders are proposed to reduce the	Best Management Practices for stormwater management will be utilized in all new development to ensure quality and quantity control of stormwater. The AFRH will seek developers who place emphasis on low-impact development and environmental sensitivity.

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			effects of stormwater, it is important to note that stormwater ponds and other stormwater facilities do not replicate natural systems, which greatly slow water before it reaches streams, wetlands and other waters. Development results in the loss of trees and other vegetation, the compaction of soils by heavy equipment and the creation of vast stretches of connected impervious areas. These combined factors are extremely difficult to compensate for using traditional practices. Prior to the development of any structural stormwater practices on a site, significant reductions in stormwater quantity and quality impacts can be made through enhancements to site design.	
176.	4.1.2	Stephens, Arlus J.	Many residents in the area to the west of	See response to comment #14.

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		Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	AFRH use their basements for living space or rent them out to gain much needed income. AFRH enjoys the physical advantages of being the third highest point in the District of Columbia. The draft EIS has not considered how dense construction on the AFRH property will change the water table and how this might affect basements in the adjacent, lower lying area, or simply what will be the effect to drainage systems, natural or man made. A raised water table could result in a serious damage to the use of basements and a substantial loss in income.	The majority of development on the AFRH-W would occur on the eastern portion of the property. Given the topography on the AFRH-W, most of the additional surface water runoff created from the increase in impervious area would flow east and away from the neighborhoods located adjacent to the western boundary of the AFRH. Surface water runoff created from the increase in impervious area on the western and eastern portions of the site would be subject to stormwater management to ensure that there are no impacts to groundwater recharge or flooding.
177.	4.1.2	The Potomac Conservancy	The destruction of open space in an urban setting creates numerous problems. First, the addition of impervious surfaces will create increased	See response to comment #176. Best Management Practices for stormwater management will be utilized in all new development to ensure quality

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			run-off and lead to the degradation of the fish ponds, and channeled streams. The streams and runoff eventually add to the overall decline in our major waterways such as the Potomac River and Chesapeake Bay.	and quantity control of stormwater. Therefore there will be negligible to no impacts to on- or off-site surface water resources.
178.	4.1.2.2	AFRH Master Plan Committee	The golf course is intended to remain a permanent part of the facility outside of the zoned development area. Past and present storm water run-off adversely affects several fairways and greens. The third hole fairway, and most heavily, the area of the eight green. Mitigating measures are estimated to greatly reduce further storm water and waste water run-off with minor long term adverse effects. Even a minor increase of run-off and pollution will severely damage the	Best Management Practices for stormwater management will be utilized in all new development to ensure quality and quantity control of stormwater to minimize any impacts to resources such as the golf course. At this time, there is no cross compound construction expected as part of the development. Utilities will be connected to the street utilities closest to the development. For example, development in Zone A (formerly Zones B and C) will be connected to utilities off of North Capitol Street.

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			eighth hole, making it unplayable both short and long term. Cross compound construction will create new structures, pipe lines and impede access to the golf course both short and long term.	
179.	4.1.2.2	DC Office of Planning	The mitigation measures outlined in the draft EIS report address both the short- and long-term impacts of the increased stormwater runoff that would be generated as a result of increased imperviousness from the development. In particular, we strongly support implementation of the low impact development (LID) practices such as bio-retention, infiltration trenches (where the soils are suitable), dry wells, rock trench level spreaders, and vegetative controls outlined in the report. However, in addition to the above list of	Best Management Practices for stormwater management will be utilized in all new development to ensure quality and quantity control of stormwater. The AFRH will seek developers who place emphasis on low-impact development and environmental sensitivity.

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			best management practices, we recommend that the developers also look into the feasibility of green roofs because of the numerous environmental benefits that can be achieved from such systems.	
180.	4.1.2.2	District of Columbia Department of Housing and Community Development (DHCD)	Maximum use should be made of environmentally sensitive "green' building and site design strategies (such as permeable parking lot paving and green building roofs) in order to minimize the increase in the amount of new impervious pavement and building tops generated by proposed development in the six development zones of the Master Plan.	The AFRH will seek developers who place emphasis on low-impact development and environmental sensitivity.
181.	4.1.2.2	Donahue, Kathleen	Tables 4-4, 4-5, and 4-6 highlight various issues related to storm water runoff. Unlike table 4-3, no baseline is provided to indicate how the values	Baseline impacts for the No Action Alternative have been added to Section 4.1.2.2 of the Final EIS.

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			compare to pre-development levels. This information is necessary to understand the real impact of the development on the watershed.	
182.	4.1.3	Arguto, William EPA	To determine the baseline value of the habitat and the severity of the potential impacts from the proposed project, EPA recommends that a baseline Habitat Evaluation Procedure (HEP) be completed on the study area using the U.S. Fish and Wildlife Services's Habitat Evaluation Procedure. If the impacts of the wildlife and terrestrial habitat are unavoidable, the HEP will help to determine the type of mitigation measures which would be considered appropriate for the potential impacts. Measures to avoid potential adverse impacts to these resources should be evaluated and implementation and	Because the Master Plan Alternatives studied in the EIS, approximately 182 to188 acres (67 to 70 percent) of the AFRH-W would remain in open space, the AFRH does not believe a full HEP analysis is warranted for the proposed action. As the Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts to resources including the mature trees on the facility.

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			mitigation plans to minimize impacts should be developed. Where such impacts cannot be avoided, adequate compensation developed through habitat assessment must be implemented.	
183.	4.1.3	Donahue, Kathleen	Although this section addresses reduction in green space and wildlife habitat, it does not address the issue of human/animal contact caused by the reduction of habitat. This could increase levels of road kill from animals entering developed areas from green space. I believe the impact on terrestrial biota would be higher than stated in the DEIS.	Under the Master Plan Alternatives, the majority of the proposed development would occur in and around portions of the site which have been previously developed. Approximately 182 to 188 acres, or 67 to 70 percent, of the AFRH-W would remain in open space. Wildlife on the AFRH-W has adapted to living in an urban environment and there would be minimal change in the conditions under which wildlife currently live.
184.	4.1.3	Kenngott, Christine	A call for a more thorough assessment of impact to wildlife is in order. To simply say this is an urban area so impact is	Under the Master Plan Alternatives, the majority of the proposed development would occur in and around portions of the site which have been previously

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			minimal is absolutely false.	developed. Approximately 182 to 188 acres (or 67 to 70 percent) of the AFRH-W would remain as open space. Wildlife on the AFRH-W has adapted to living in an urban environment and there would be minimal change in the conditions under which wildlife currently live.
185.	4.1.3	Kenngott, Christine	At the current time, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality.	The AFRH-W is largely open space with mature trees forming landscaping features primarily in the Chapel Woods Character Area. This is located in the AFRH Zone (formerly Zone 2) which is reserved for AFRH use. Development alternatives are being considered in Character areas classified as Modern Impact, Pastures and Cultivated Field. No large forested areas would be removed under the draft Master Plan Alternatives. Removal of mature trees

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				on the property would have a negligible effect on air quality.
186.	4.1.3	Songer, Melissa	I would call for a more thorough assessment of impacts to wildlife. To simply say this is an urban area so impact is minimal is absolutely false. As a Smithsonian research biologist who has studied urban ecosystems, I am sure impact to such an area is not minimal and will be trying to pursue a study which will prove it if development of Zone 6 proceeds. This area should be off-limits. Preserving this area will be some protection for wildlife that will be affected by the development.	Under the Master Plan Alternatives, the majority of the proposed development would occur in and around portions of the site which have been previously developed. Approximately 182 to 188 acres, or 67 to 70 percent, of the AFRH-W would remain in open space. Wildlife on the AFRH-W has adapted to living in an urban environment and there would be minimal change in the conditions under which wildlife currently live. Development in Zones B and C (formerly Zones 5 and 6) would be undertaken in later phases if needed to meet the Home's financial needs.
187.	4.1.3	Stephens, Arlus J.	The DEIS did not make clear that any development would include retention of all mature trees. Keeping these trees is	See response to comment #185. As the draft Master Plan is implemented,

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			important, particularly in the historic character areas. All development alternatives must be crafted in such a way as to preserve the mature trees.	the AFRH will make every effort to further avoid and minimize impacts to resources including the mature trees on the facility. In 2004, AFRH completed a Resources Identification and Evaluation Study that has enabled it to protect most of the mature trees identified and to create a draft Master Plan sensitive to the Character areas of the site.
188.	4.1.3 and 4.3.2	Department of the Interior	The AFRH-W presents special and unique values to the overall setting of the Nations Capital in that it provides viewpoints from which the National Capital can be seen, as well as having a significant presence when viewed from many locations. Thus, we believe that the FEIS should define specific building height limits and levels of mature tree growth preservation. Certainly the	Design guidelines are being developed which will prescribe building height limits. As the final Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts to resources including the mature trees on the facility.

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			indication of the general extent of development and landscaping of the area should be envisioned in the FEIS in order to indicate the scope of impacts and extent of mitigation necessary.	
189.	4.2	AFRH Master Plan Committee	Within Section 4.2 Social Environment the only consideration is given to Population and Housing with no mention of the Social or Economic Characteristics outline in the Fact Sheet for Census Tract 23.02 (that tract in which the AFRH-W is located). Reference to Question (2) under Chapter 3, page 3-11. Why is no consideration given to the consequences of the proposed alternatives on the social environment and the Social and Economic Characteristics of the "Ground Zero: impact area of the alternatives (Sheridan	Demographic information on the AFRH-W residents has been added to Section 3.2.1 and impacts to this population have been expanded in Section 4.2.1.

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			and Scott buildings at the AFRH-W)?	
190.	4.2.1	Donahue, Kathleen	Social Environment - States that the affect of the change to the views from the Park View neighborhood would have long term, moderate, and adverse from the perspective of those residents who may prefer to look out on open space. I can attest, as one of those residents, that the affects to my view would be severe or highly noticeable or major. No mitigation measures are included in this section. Development proposals could require the maintenance of significant green space in this area along with development, so that only some of the traditional views are disrupted.	Design guidelines are being developed which will prescribe architectural design and building height limits. Residential development in Zone C (formerly Zone 6) would be two to three stories in height in keeping with the Parkview and Petworth neighborhoods. Approximately 182 to 188 acres, or 67 to 70 percent, of the AFRH-W would remain in open space. Development in Zones B and C (formerly Zones 5 and 6) would be undertaken in later phases if needed to meet the Home's financial needs.
191.	4.2.1	Tubman, Michael	Park View residents enjoy a view of the trees and green areas of the Soldiers Home. The draft EIS recognizes the loss of this viewshed on p. 4-19,	Design guidelines will be put in place to mitigate impacts to viewsheds to the extent possible. The AFRH is working with a community planning group to

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			unfortunately no mitigation measures are mentioned for this loss. The FEIS should include the option of mitigating at least some of this loss of the historic "park view" of the neighborhood.	develop these guidelines.
192.	4.2.2	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	The proposed development will have disproportionate negative health effects on minority populations. Specifically, air pollution problems are local as well as regional in scope. The nearby neighborhoods would experience the largest change in air quality from the increased traffic and other pollution sources associated with the proposed development. Further, local air pollution is linked to increased incidence of respiratory illness. Three different recent studies being published this month in Epidemiology find a significant link between daily ground-	The EIS assesses the Master Plan Alternatives conformity with the National Ambient Air Quality Standards (NAAQS). According to the EPA, the primary NAAQS standards “are designed to establish limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly.” The EIS acknowledges that the Alternatives would all result in emissions of nitrogen oxide above the “de minimus” (or conformance) level. Therefore, the AFRH will be required to conduct a General Conformity

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			level ozone in cities and mortality rates in the next 3 days. Ozone is formed when pollutants, such as car exhaust mix with heat and sunlight. Editors of Epidemiology have made the rather unprecedented comment that together these studies point to an "urgent need to reduce public exposure to ambient ozone by all possible means." To that fact must be added that communities of color across the nation are experiencing disproportionately high levels of asthma and other respiratory illness. The deteriorated local air quality will also worsen these health problems in this predominantly African American neighborhood. The heat-retention effect of the loss of current AFRH green space will also promote additional local ground-level ozone formation. Finally,	determination to ensure that the proposed project is consistent with the Metropolitan Washington State Implementation Plan (SIP). The project will be brought into conformance one of four ways: • By showing that the emission increases caused by an action are included in the SIP • By demonstrating that the Metropolitan Washington Council of Governments agrees to include the emission increases in the SIP • Through offsets (decreases in emissions in one area to make up for increases in emissions elsewhere) • Through mitigation (such as limiting hours of operation or incorporating emissions control technology)

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			the current mature trees on the AFRH property contribute positively to air quality, particularly in the immediate vicinity of the property.	As the Master Plan is implemented, the AFRH will make every effort to further avoid and minimize impacts to resources including the mature trees on the facility.
193.	4.2.2.2	Van Wye, Brian	Stormwater Impact should be very strongly controlled – no net impacts	The AFRH is committed to providing adequate stormwater management and using low-impact development techniques to minimize impacts such that there is negligible to no impact to these distant resources.
194.	4.2.3	Catherine McCarthy	Any thoughts as to the increase in crime to come with the influx of thousands of people working and living on the grounds and what will be done to ensure our safety?	The Master Plan will include a new secured perimeter that will maintain the security of AFRH-W operations for its residents. Development Zones A, B, and C (formerly Zones 3, 4, 5, and 6) would be open to the public.
195.	4.2.3	DC Fire & Emergency Medical Services	The contents of this plan will have an impact on the DC Fire and EMS Department. However, the impact amounts to the normal daily operating	The development will comply with District of Columbia codes related to fire department access, fire detection, suppression systems, and emergency

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			practices that are already set in place by the department. Basically, your plan is proposing to sell or lease the land that the AFRH currently occupies for future urban development purposes. This will offer more potential building structures that the DC Fire and EMS Department will be responsible for in the area of incident mitigation, emergency response, and fire inspections. Understanding the fact that the city is on an upward growth path, this proposal renders minimal impact to the fire service as long as all structures and occupancies are erected according to the current codes and standards set forth by the District of Columbia, especially in the area of fire department access, fire detection and suppression systems, and	planning.

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			emergency planning.	
196.	4.2.3	Patykewich, Leslie	Absorptive capacity of DC infrastructure. It is of huge concern that the DC police department is already operating with limited resources. I am concerned that the capacity of the DC infrastructure to absorb increased demands has not been adequately considered.	Impacts to community services including the DC Metropolitan Police Department are described in Section 4.2.3.
197.	4.2.3 and 4.4	Fenty, Adrian	Upon reviewing the draft environmental impact statement and discussing the proposed development with community leaders in the surrounding neighborhoods it is clear to me that any development of the campus of the Armed Forces Retirement Home will have a large impact on the communities around the site, especially those in Ward 4 where I represent.	Comment noted.

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			I am particularly concerned about the possible impact the new development may have on traffic flow in concert with our existing infrastructure and the historic preservation issues associated with the property which were just so eloquently addressed. Development of this property provides a rare opportunity to create and make available open park space for community use as well and it could influence the economy by incorporating some of those values.	
198.	4.2.4	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David	Finally, and perhaps most importantly, the DEIS has not adequately taken into account the Federal Elements of the Comprehensive Plan for the National Capital adequately. In particular, there appears to have been an marked inattention to the Parks and Open Element and the Preservation and	Additional analysis of the projects consistency with the Federal Elements of the Comprehensive Plan has been added to Section 4.2.4.

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		Tufu, Adan and Janet Wahl, Abby	Historic Features Element.	
199.	4.2.4	DC Office of Planning	District revitalization/economic development priorities within the area include: 1) Georgia Avenue/Great Street land assemblage, retail improvement/attraction and redevelopment; 2) McMillan Sand Filtration Site redevelopment potential, and 3) cumulatively, the impact of all proposed area development on the transportation, traffic, transit and parking networks.	The proposed developments along Georgia Avenue and at the McMillan Sand Filtration Site were taken into consideration in the analysis of the transportation system and traffic levels in the vicinity of the AFRH-W.
200.	4.2.4	DC Office of Planning	As the site development process progresses, more information should be provided regarding development areas that will be leased and/or sold for private	Comment noted. No decisions regarding the lease or sale of land have yet been made.

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			development. The land areas sold to private developers will be subject to the Districts land use and zoning regulations.	
201.	4.2.4	Hoffman, Sandra	The second question I have is the federal elements of the comprehensive plan for national capital provide the guiding criteria for this development from what I understand from the EIS. One element of the federal elements is to enhance park and open space system of the national capital region and to ensure adequate park and open space for future generations. We are currently seeing very dense residential development throughout Columbia Heights. We are very soon going to be seeing groundbreaking on two large projects on Georgia Avenue and we hope and expect to see much	The AFRH is continuing to assess ways to allow public access onto portions of the AFRH-W, including access to the ponds on the southwest portion of the property.

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			more of that along Georgia Avenue and Sherman Avenue and I think the neighbors very much welcome that kind of dense residential development. I may be speaking for myself but so far we've been able to work things out with planning. Everyone is going to work for the neighborhood. Those developments are within two to six blocks of this space. As I said, we are already experiencing a lack of parkland for recreation in this part of the city. This is one of the few large remaining open spaces available in central DC so my question is why isn't a sizeable park part of the development plan for this site and in particular I would think that Area 6 looks like it would be particularly appropriate.	
202.	4.2.5	Valenti, Cliff	Under the "no action" plan, it says there	As stated in Section 1.3, the need for the

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			will be an adverse economic impact to the AFRH-W because of insufficient funding this statement is intellectually dishonest. A "no-action" option would have a neutral effect (no effect) on the current financial situation.	Proposed Action is the fact that AFRH's fixed income sources are insufficient to fund campus operations and improvement. The balance of the Trust Fund is shrinking because the level of financial demands to maintain AFRH and to keep up with the investments required. Immediate steps are needed to stem the depletion of the Trust Fund and to create sources of other income necessary to provide immediate support, and to sustain the retirement home long-term. The No Action Alternative would leave the Home without a means of creating new revenue and the Trust Fund would continue to be diminished. Thus there would be a substantial negative impact on the economic viability of the Home.

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203.	4.3.2	District of Columbia Historic Preservation Office	The Master Plan repeats the idea that the AFRH represents the transition between the residential uses to the west and southwest and the institutional uses to the east and southeast. It may be fruitful to compare the AFRH with a neighboring institutional campus, the Catholic University of America. Leaving aside the 49 acres of the former Harewood estate recently transferred from AFRH to Catholic (because nothing has yet been built upon it), the university campus totals less than 144 acres in area, compared with AFRH's 272 acres. Catholic is considered a fairly densely developed campus. The campus presently (as of the 2002 campus plan) has 2,325,367 total square feet of built area. At 0.37 FAR, this is significantly denser than AFRH, and in	The Alternatives proposed treat each of the delineated zones as distinctively different and uniquely influenced by their Character areas in which the zones are located. AFRH compares each of the zones to a like comparative landmark. AFRH has divided its campus into four zones. Development proposals for the AFRH Zone (formerly Zones 1 and 2) are the same across all alternatives. Character areas in these zones include Chapel Woods, Formal Meadow and Central Grounds or the historic core. Development in the AFRH Zone, located in the Modern Impact Character Area compares is located across Catholic University (zoned R-5-A up to 1.0 FAR). The FAR in the AFRH Zone is 0.45 to 0.8 less than the allowable FAR of 1.0 for Catholic University. The

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			the absence of any historic preservation regulation of the campus, whatever historic landscapes and vistas that might have once existed at Catholic have since been reduced to the green lawns surrounding the buildings. The exception is the playing fields at the north end of the campus which are analogous to the golf course that would be retained at AFRH. If this same level of density were applied to the larger AFRH campus, it would total less than 4.4 million square feet – or millions of square feet less than AFRH intends to add under any scenario – with similar, if not more dramatic consequences to the landscape and historic structures. The proposed density for AFRH ranges from 0.63 to 0.85 FAR overall, but it would be concentrated in certain areas. And	comparable landmark for Zone A which is located in the Modern Impact, Pasture and Hospital Complex Character Areas are Georgetown University and Washington Hospital Center, zones for up to 1.8 and 3.4 FAR, respectively. Development alternatives for these zones propose FARs ranging from 1.75 to 2.64, still significantly lower than the allowable FAR for comparable development areas.

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			these figures do not necessarily account for the additional area required for parking; Catholic now accommodates 1,939 spaces, whereas the AFRH Master plan calls for 7,500 to 16,000.	
204.	4.3.2	District of Columbia Historic Preservation Office	The Design Framework is, frankly, contradictory on the intended character of the campus. It points out an opportunity to reinforce the "sharp contrast" between the edges of the proposed "urban" construction and the remaining open landscape ("one becomes a backdrop for the other") – then twice states that there is no need or desire for "a hard urban edge," and yet suggest how "an urban edge in a landscape could be addressed." With regard to protecting the setting of the significant buildings and the overall character of the property, the Design	Comment noted.

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			Framework is absolutely correct in stating that "buildings should be subtly integrated into the existing landscape." It is difficult to imagine, however, how an additional six to eight million square feet of construction, expressed as buildings ranging from four to ten stories in height, can be accommodated subtly. The plan proposes more than quadrupling, if not more than sextupling, the present built area. This seems more along the lines of the "staggering mass" of large buildings added in accordance with the 1947 and 1953 master plans – resulting in the demolition of historic buildings and the interruption of views and axial relationships, but fortunately never completely realized (see page 18). It is clear that at some point a balance between open space retention – as both	

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			historic landscapes and as bucolic setting for the buildings – and the built area itself will reach an unfortunate tipping point. We fear that, instead of subtly inserting buildings into the landscape, what is proposed is essentially to shrink the campus and build around it something that is very different in character. The possible parcelization shown on page 27 imperils a substantial portion of the Chapel Woods, as well as the formerly cultivated area (Character Area 7) located along Rock Creek Church Road and serving as a buffer to the neighborhood to the west. While in form, the built environment might relate to the remaining large pieces of open space in the manner suggested by the photograph of the very urban Park Squared Gardens, London on page 20,	

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			the new development would mostly be segregated from such spaces by the proposed new security perimeter.	
205.	4.3.2	District of Columbia Historic Preservation Office	While we appreciate the candor of the general determination of effects, there is relatively little analysis of what the particular effects might be. With the exception of the "Urban Design Framework Diagram" on page 22 of the Master Plan – which shows that nearly all of the identified primary views would be adversely affected – there is no attempt to relate the plan to the previous surveys of cultural resources. There is no examination of which buildings might be demolished or expanded. The figures for new floor area are proposed in addition to the existing contributing and non-contribution structures, but it is not clear how the new construction	Issue to be addressed by Planning Committee.

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			would occur in relation to the old. Such analysis is expected in an EIS, and some proposed mitigation of adverse impacts would be appropriate. A finding of "long-term, major effects" is, in a sense, facile because it does not state any probable effects in particular. We refer you to Hector Abreu's comments on the Master Plan sent to Gary Porter on June 27, especially reuse and prioritization analysis of the sort he suggests in his point #13 and better graphic representation of what build-out might look like as suggested in points #8 and #9 (or as rendered in an axonometric massing model of the campus which would include both building bulk and parking facilities). In doing so, the Character Area Guidelines (pages 30 - 33) should be applied. Acknowledging	

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			significant adverse effects appears to be directly contrary to the Master Plan's first objective: "Maximize development on the AFRH-W while maintaining the historic character of the site and retaining significant existing open space." And "significant existing open space" is ambiguous in that it might suggest simply the preservation of "significant" amount of open space as opposed to the preservation of significant open spaces.	
206.	4.3.2	District of Columbia Historic Preservation Office	Our greatest concern about the draft master plan is the bulk proposed. The AFRH has had a low-density campus character since its founding in the mid nineteenth century. The campus is presently a "garden in the city," as characterized on page 20 of the master Plan; at best, the Design Framework	Alternative developments proposed on the west side of the campus in Zones B and C (formerly Zones 5 and 6) range in FAR from .98 for Alternatives 3A and 4 to an FAR of 2.3 for Alternative 2. Comparatively, Park View and Petworth on the west side of the campus are zoned R4 – equivalent to 1.2-1.8 FARs.

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			proposes to create instead a "city in the garden." The development zones have the potential to exceed the density of the surrounding rowhouse neighborhoods (the highest-density alternative could, if spread over the entire campus, nearly cover the entire property one story deep – but each of the options concentrates the vast majority of the built area on substantially less than half of the property, with heights up to ten stories, or perhaps twelve or thirteen – see page 27).	Further, approximately 60% - 70% of the site will remain undeveloped.
207.	4.3.2	District of Columbia Historic Preservation Office	Naturally, security measures will be another issue. The nature of a campus is in the relationships that exist between buildings and landscapes. Views and passage through the landscape are very important to the character of campuses and to this very historic one. Creating a	The Master Plan will include a new secured perimeter that will maintain the security of AFRH-W operations for its residents. Development Zones A, B, and C (formerly Zones 3, 4, 5, and 6) would be open to the public. As noted in the comment, this new security perimeter

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			new fence line across the campus will adversely affect these aspects. The Character Area Guidelines take a good initial stab at this problem.	will have an adverse effect on historic views and landscapes.
208.	4.3.2	Hafvenstein, Lauri	The EIS also fails to address the unique role that the AFRH has played in the development and life of the Columbia Heights and Petworth communities. These local neighborhoods of historic row houses—including those in *Park View*, where I live—were laid out in the early part of the 20th century to take advantage of views to the open space along the western edge of the property. The very character of the area is defined by the beauty and quiet that residents and passersby enjoy each day.	Section 4.3.2 of the draft EIS recognizes that AFRH is the park referenced in the name Parkview. And describes the impact the proposed development would have on the relationship between the neighborhood and the AFRH-W. The Final Master Plan will be sensitive to existing landscape conditions and open space.
209.	4.3.2	Hafvenstein, Lauri	We are standing on sacred ground and once the cement is poured it can't be brought back. I have read the EIS and I	Comment noted.

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			do not feel that enough attention has been given to the adverse impact to the historic landscape. I think that this impacts not just the neighboring community but the city and indeed the entire nation. Are we developing this land for the nation? It appears that we are not. There are untold hundreds of thousands that have not yet discovered Lincoln's Cottage. Nor have they yet found the first Arlington Cemetery behind the cottage where soldiers from the First Battle of Bull Run and other conflicts are buried. We should think of the land surrounding these sacred sites no differently than the space around Washington's Mount Vernon or Jefferson's Monticello.	

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210.	4.3.2	McGluray, Andrew	In addition I think the EIS really doesn't consider seriously enough the impact on what they call the historic character areas and Arlus was speaking about one of these earlier. And what's really bizarre to me, if you look at the map of the parcels proposed for development in the EIS and then you look at the map of what are considered the historic character areas, it's almost a perfect overlap. It's like they've picked essentially the areas with the most historic significance as those to sell off and I realize there may be some reasons for some of that but it doesn't seem like something that's very wise and they really ought to look at at least avoiding the areas that are considered to have historic character.	Character Areas 1 through 7 are intact or retain historical integrity. Character Area 8, identified as the Modern Impact Area, has been compromised, or lacking in historical integrity. As presented in the Master Plan Alternatives, the majority of new construction is proposed within Character Area 8, a compromised Character Area.

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211.	4.3.2	National Trust for Historic Preservation	The DEIS acknowledges that each of the proposed Master Plan alternatives (excluding the No Action Alternative) will have "direct, long-term, major, adverse" impacts on the Home's historic resources. DEIS at vii, and 4-34 to 4-35. Perhaps the most substantial impact on historic resources, including the National Monument, will be the result of the scale, height, and density of the new construction. The magnitude of the development proposed in the Draft EIS ranges from a total of 6.055 million square feet, at the minimum, to a maximum total of 8.745 million square feet, located in 6 identified zones. As indicated in the DEIS, this level of development would change the setting and views from the National Monument, the National Historic Landmark and	Comment noted

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			National Register-listed portions of the campus; would result in the loss of National Register-eligible cultural landscapes; and would alter the historic context of buildings and obscure the relationship between the buildings and the landscape. Anyone who has visited the site is keenly aware of the importance of the views from the Home toward Washington's monumental center, including views of the United States Capitol Building and the Washington Monument. These same views undoubtedly inspired President Lincoln as they continue to inspire and renew the residents of the Armed Forces Retirement Home and visitors to the Lincoln Cottage today.	
212.	4.3.2	National Trust for Historic	Mitigation measures (not spelled out in the DEIS) should ensure that	Signatories and Consulting parties to develop a programmatic agreement have

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		Preservation	development within the Intact Character Areas be limited to adaptive reuse of historic structures and that any new construction be strictly compatible with the contributing properties in the historic district. Another concern with the DEIS is the limited extent to which it explores the potential mitigation of the adverse impacts on historic resources. The DEIS indicates that AFRH has initiated consultation with the DCHPO as required pursuant to section 106 of the National Historic Preservation Act, and that a programmatic agreement is being developed to identify mitigation measures, including preservation design guidelines to be incorporated into the final Master Plan. The National Trust submitted a request to be a consulting	been identified. The Design guidelines and mitigation efforts for adverse impacts of proposal on historic resources at AFRH – W will be guided among other things by the programmatic agreement currently in progress in consultation with the DCSHPO and other consulting parties.

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			party in the section 106 process in September 2004. The National Trust strongly encourages AFRH to consult with DCHPO and other consulting and interested parties concerning the development of those mitigation measures prior to finalizing the EIS, so that the mitigation measures can be disclosed through the EIS process.	
213.	4.3.2	National Trust for Historic Preservation	The National Trust also encourages the AFRH to revise the DEIS to explore and disclose the cumulative impacts of the proposed Master Plan alternatives on historic resources. Currently, the DEIS simply indicates that the alternatives would result in "long-term, major, adverse, cumulative impacts" on historic resources, DEIS at 4-39, but it does not analyze or explore what those cumulative impacts are, nor whether	Additional information on cumulative impacts has been added to the Final EIS.

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			they could be minimized or mitigated. In order to determine whether such cumulative impacts can be avoided or mitigated, it is essential that these impacts be explored and disclosed in the EIS. This discussion will be particularly helpful in the section 106 consultation process, and will assist in the development of alternatives or modifications to the project that will avoid or mitigate adverse effects, as required under 36 C.F.R. § 800.6(a).	
214.	4.3.2	National Trust for Historic Preservation	We're also concerned about the level to which the draft environmental impact statement looks at mitigation efforts to try to protect these historic resources. And we'd like to see it explore in more depth so that the public can have access to that information, some of these mitigation efforts. Some of this will be	See response to comment # 212. .

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			done through the Section 106 process but typically in the Section 106 process when it's combined with the NEPA process those mitigation efforts are disclosed so that you all and we can be aware of them and participate in talking about them.	
215.	4.3.2	National Trust for Historic Preservation	Finally we are also concerned about the cumulative impacts of the development that's proposed and we don't think the draft EIS goes quite far enough in looking at what those cumulative impacts would be. For instance, the cumulative impacts are things like parking needs over time, street construction, and things like that that over the long term will have even greater impacts so we'd like to see the EIS address those.	See response to comment # 213..

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216.	4.3.2	Patykewich, Leslie	While the AFRH may be preserving some of the historic buildings, the plan appears to ignore the overall historic integrity as it does not reflect or consider the value of preserving the surroundings to these historic buildings. As stated at the June 22 meeting, development will permanently change the historic value unique to the AFRH. In addition, the proposal appears to be inconsistent with existing architecture and therefore not preserving the historic quality of the community. For example, while the draft claims that options will be consistent with neighboring architecture, the plans propose buildings (6-8 stories). This is NOT consistent with the existing architecture.	Design guidelines are being developed which will prescribe architectural design and building height limits. Residential development in Zone C (formerly Zone 6) would be two to three stories in height in keeping with the Parkview and Petworth neighborhoods. The only place a building may be taller is in the vicinity of the AFRH-W entrance at the end of Illinois Avenue.
217.	4.3.2	The Potomac Conservancy	Third, the development of a historically open space will change the character of	Under the Master Plan Alternatives studied in the EIS, approximately 182 to

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			the community and degrade the environment. The meadow, pastures, and community garden will be destroyed to create a glut of buildings and parking lots. These open areas are a link to the subsistence history of AFRH. The current residents enjoy the walkways and vista of greenery.	188 acres (or 67 to 70 percent) of the AFRH-W would remain in open space. No development is planned for the Formal Meadow. Construction in the Pasture is to be arranged in a manner to preserve a substantial portion of the open grassland as a park that, along with the grove of trees, will serve as a natural buffer between the historic Hospital Complex and the proposed new development area. Proposed Alternatives for the community gardens is small scale, no more that four stories in height and compatible with the residential neighborhoods of Parkview and Petworth.
218.	4.3.2 and 4.8	AFRH Master Plan Committee	Chapter 4, page 4-35, Character Area 3: Chapel Woods It is logical to assume that with spills of oil, gas, etc, the Auto Craft Shop has	The Auto Craft Shop is a non-contributing resource within the historic Chapel Woods Character Area. Until the design plans are developed it is not

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			experienced some soil contamination. A stated objective of the AFRH-W master Plan is "Preserve and improve the essential components of the AFRH-W for the residents and the community". If the Auto Craft Shop falls within the definition of "essential components of the AFRH-W then it is logical to expect that the shop will be relocated to another area within AFRH-W. What specific measures will be taken to ensure that soil contamination is eliminated at the new location? Where within the master plan is the designated location of the relocated Auto Craft Shop? Where will the Motor Homes, Campers and other large vehicles associated with the Auto Craft Shop be relocated?	known if the Auto Craft Shop will be directly affected.

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219.	4.3.3 and 4.11	Donahue, Kathleen	The DEIS addresses the adverse affects of developments on historic viewsheds, the historic cultural landscape, and the historic district. It cannot be emphasized enough that once a historic place is destroyed, it cannot be replaced.	Section 4.11, Irreversible or Irretrievable Commitment of Resources, describes impacts that will be permanently lost with implementation of the Master Plan.
220.	4.4	AFRH Master Plan Committee	Does the data in tables 4-10 through 4-16 accurately reflect a twelve month period as opposed to reflecting only the specific period of the actual measurements which were taken at the specified times? Do the vehicle trips discussed under each alternative accurately reflect the 17,000 additional vehicles referred to elsewhere in the EIS?	The data in Tables 4-10 through 4-18 are based on models which take into account the number of vehicles that will travel to and from the site during peak hours on any given day. Yes. The models take into account that not everyone arrives at or leaves a site at the same time. Therefore, although parking may be provided for between 8,000 and 17,000 vehicles, not all of these vehicles will enter or leave the site during one peak hour.
221.	4.4	AFRH Master Plan	What will be the environmental impact	Existing parking spaces will be replaced

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		Committee	when all parking spaces located within the development zones currently reserved for residents, employees and visitors are removed from their current location and moved to a new location? Where and when will the parking facilities be relocated and what will be the environmental impact of this relocation?	if affected by new development. Until designs are developed, it is unknown if parking spaces will be affected and where new parking will be located. The location and type of new parking for residents would be sympathetic to the needs of elderly residents.
222.	4.4	AFRH Master Plan Committee	What initiatives are in place or planned to accommodate vehicle traffic and parking when the Lincoln Cottage is open to the public?	The National Trust, in cooperation with the AFRH leads the effort to restore and develop Lincoln's Cottage. Presently, the Cottage is not open to the public and is planned to open in several years time. AFRH is currently in negotiations with the National Trust to make accommodations for among other things vehicular traffic and security management plans.

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223.	4.4	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby Stephens, Arlus J.	The impact on traffic is vague and unexplored. It requires more details, specifics, and cost information. There is no information about the impact on the community of the number of peak-hour trips suggested in terms of cost to the city of Washington DC to address, the damage to the local infrastructure, and the overall impact on the surrounding community.	Mitigation to minimize traffic impacts would include roadway improvements that would be partially financed by the developers selected by the AFRH-W. In addition, as part of any development agreement, AFRH would require a developer to prepare a transportation management plan detailing strategies to reduce single occupancy vehicle usage.
224.	4.4	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew	The transportation impact study of the EIS has not considered the impact of increased traffic on side streets between the affected AFRH property and Georgia and New Hampshire Avenues. The impact of the level of increased traffic considered is unlikely to be limited to	The intersections studied in the EIS were determined in consultation with the District Department of Transportation.

Comment Number	EIS Section Number	Commenter	Comment	Response
		Pansegrow, David Tufu, Adan and Janet Wahl, Abby Stephens, Arlus Hoffman, Sandra	the main streets currently studied in the EIS. More specifically, the neighborhoods to the west of the AFRH property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The EIS has not considered the impact of increased traffic on loss of recreational services provided by streets in Petworth and Park View. In addition, the District of Columbia government has recognized that there is a serious problem with pedestrian deaths from automobiles on city streets. Bringing a large number of automobiles into narrow residential streets will likely increase the mortality rate in the area to the west of AFRH, particularly because of the relatively	

Comment Number	EIS Section Number	Commenter	Comment	Response
			large number of elderly and children.	
225.	4.4	Catherine McCarthy	What will be the traffic pattern(s) on the home grounds and who will control it? How will the increase in traffic, on the grounds, impact foot traffic and those on BPVs?	Traffic patterns for the proposed development will be separated from traffic patterns on the areas retained for AFRH-W usage. The Master Plan will include circulation plans including pedestrian walkways within the AFRH-W.
226.	4.4	Catherine McCarthy	Who will be responsible for the upkeep of the roadways on the home grounds?	The AFRH will be responsible for the upkeep of roadway on land retained for its use. Agreements with developers will dictate responsibility for roadway maintenance.
227.	4.4 4.2.3	Donahue, Kathleen	Transportation section is woefully inadequate in addressing the affects of the proposed development on public transportation needs and infrastructure. This topic is not addressed in either 4.4 or 4.2.3. New residents would undoubtedly use automobiles but many	Additional information on impacts to Metrorail and Metrobus has been added to the Final EIS.

Comment Number	EIS Section Number	Commenter	Comment	Response
			would use public transportation too. Increased use of nearby Metro station and Metrobus system is not addressed, nor is potential need for additional bus lines. The changes could be costly and detrimental to current users. Overcrowded trains and buses, increased traffic could slow public transportation for residents all over the area. Bicycle transportation is not addressed in the DEIS. Increased traffic will significantly increase the level of risk for those who use bicycles to commute to work.	
228.	4.4	Ewert, Mark	I also found that the EIS does not account for a huge amount of people that might be on this property. The people who might be patients and visitors to the medical facility, the people who might be visitors to the hotel and conference center, the people who would be	The formulas used to model future traffic take into consideration the type of development (hotel, medical, retail) and thus are developed to take into account the number of people utilizing the facility and their travel patterns.

Comment Number	EIS Section Number	Commenter	Comment	Response
			shoppers in the proposed retail spaces, and the visitors to the national monument are not accounted for. I created some formulas for those. They are in the letter that I have sent so I won't go over those formulas for the interest of time but there could be up to 50,000 people on this piece of property. That's the size of Harrisburg, Pennsylvania, so if we think that our surfaces around this area can withstand this environment, can withstand 50,000 people all at once, I would be very much surprised.	
229.	4.4	Grandy, Timothy	Rock Creek Church Road volume Two lanes of traffic that cannot be expanded. The DC government has refused to provide any type of traffic calming measures along this road, including the	The traffic analysis in Section 4.4 has been revised to reflect the new traffic patterns at Harewood Road and North Capitol Street.

Comment Number	EIS Section Number	Commenter	Comment	Response
			use of sidewalks to access north bound busses. Pedestrian safety is key, but it is not being adequately addressed. The development plans worsen this situation. Access to area 6 and the neighborhoods bordering Rock Creek Church Road cannot be via Harewood Road from North Capitol Street. In assisting traffic to flow more effectively through to the suburbs, the Federal Government has eliminated access to the neighborhoods via this route. This will further saturate the flow of traffic along Harewood Road. Because of this, Warder Street will become overburdened with North bound traffic until Rock Creek Church Road.	
230.	4.4	Grandy, Timothy	The Upshur Street Gate The one-way streets currently used to calm traffic flow in the neighborhoods	Comment noted.

Comment Number	EIS Section Number	Commenter	Comment	Response
			near the Rock Creek Church Road and Upshur Street intersections, causes traffic to stack up on Upshur Street during the morning and evening rush hours, result in a land locking effect for residents north of Upshur Street, and east of Third Street desiring to go east.	
231.	4.4	Grandy, Timothy	The street patterns of the proposed new development should work in with the established city grid and planning. This includes the use of green spaces, parks, and vistas	Comment noted.
232.	4.4	Grandy, Timothy	Office development of the property will contribute a 9-5 traffic component and the hospital will create traffic within these hours from patients visiting the medical center.	Traffic patterns associated with office and medical development have been taken into consideration in the traffic analysis in Section 4.4.
233.	4.4	MedStar/Washington Hospital Center	The major street arteries adjacent to the site, such as North Capitol Street and	Comment noted.

Comment Number	EIS Section Number	Commenter	Comment	Response
			Irving Street and Michigan Avenue provide excellent access to the site. A relatively high density could be accommodated so long as residential areas to the northwest are protected. The characteristics of the site, with large open spaces, lend itself to appropriate urban development appropriate so as to counteract urban sprawl. Metro's Red Line is sufficiently close to the site that shuttle bus service benefiting all in the immediate community would reduce traffic.	
234.	4.4	MedStar/Washington Hospital Center	The traffic impact identified in Alternative 2 overstates the projections Washington Hospital Center developed by a factor of 2. We believe the Environmental Impact Analysis of ALT 2 overestimated total peak hour trip generation by a factor of	No decisions on the development of the AFRH have been made and no developers have been selected. The traffic analysis included in the draft EIS are based on the broad types of development included in the draft Master Plan Alternatives. Traffic levels

Comment Number	EIS Section Number	Commenter	Comment	Response
			2+ forecast 21,269 trips vs. 8,983 trips. The principal reasons for the over estimation were: Use of junior/community college ratio for the area designated as medical education. This overstates the need by 6 times. Does not account for replacement of existing trips (WHC move to AFRH takes traffic away from WHC campus). Does not account for full impact of internal capture and transit - 2 Metro stops and 5 bus routes directly serving adjacent land use. Does not recognize shift change hours for medical facilities vs. office users that mirror rush hour, i.e., clinical facility staff arrive before a.m. peak hour and leave before p.m. peak hour	represent the worst case scenario for each alternative.

Comment Number	EIS Section Number	Commenter	Comment	Response
			Parking demand for ALT 2 was overestimated by a factor of 2. Note that NIH with a daytime population of 17,000 only provides 8,000 spaces on its 300 acre campus. Suggest that prior to assigning final traffic impact, a more refined analysis be undertaken to more accurately predict future growth parameters – note also that the full development programs is spread over a 15-20 year time frame. This allows for adjustments to be made in roadway configuration, mass transit utilization, internal traffic management, and development staging.	
235.	4.4	Patykewich, Leslie	The lack of a nearby metro station will result in an already taxed road system being further overburdened.	The traffic impacts described in Section 4.4 take into account the distance of the metro stations and, therefore, the potential for low mass transit usage. Petworth Metrorail Station – Green Line

Comment Number	EIS Section Number	Commenter	Comment	Response
				located eight blocks south (less than one mile). Brookland Metro Station – Red Line located 2 miles east. Fort Totten Metro on the Red and Green lines – located 3 miles northeast of the site. Five Metrobus lines and these three metro stations serve the area.
236.	4.4	Patykewich, Leslie	Conduct a rigorous and unbiased parking and traffic study that considers nearby approved development	See response to comments #234 and #235. The EIS uses accepted professional standards for assessing the impacts of traffic and transportation and takes into consideration planned development.
237.	4.4	Rooney, Thomas	The DC Office of Planning has stated there will be no major highway. This is from some of their own propaganda. DC will have no major highway improvements to 2025, and that's from the Regional Plan to 2025, the year 2000	See response to comments #234, #235, and #236. Mitigation to minimize traffic impacts would include roadway improvements which would be financed by the developer selected by the AFRH-W. In addition, as part of any development agreement, AFRH would

Comment Number	EIS Section Number	Commenter	Comment	Response
			update to constrain long-range plans. So the long-range plan is there is no money to improve the roads. Well, back in 2001 when we got this information some from workshops they were doing on McMillan the North Capitol and Michigan Avenue intersection was a level of service D in a range going to F, failure. The Office of Planning's solution to the coming traffic crisis was, "The developers will have to coordinate mitigation with other major traffic generators to solve traffic issues." From that gobbledygook it seems that DOT is not responsible for the traffic and the developer is going to be responsible for the traffic but how does a developer be responsible for the traffic when in the EIS statement they admit that North	require a developer to prepare and implement a transportation management plan detailing strategies to reduce single occupancy vehicle usage.

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			Capitol and Michigan, Harewood Road and Michigan, and First Street and Michigan all will be rated F? Currently they're rated D so we are only one step from F. So all of this additional traffic will have a humongous impact. On page 441 labeled "Trip Generation" is expected from the development AM peak hours 11,310 vehicles. That's per hour. PM peak hours, 9,960 vehicles, that's per hour. So that is not workable. Everything will clog down. Interestingly enough, the DC DOT put out a little pamphlet the other day, mailed it around to residents about what to do when we get attacked by terrorists or whatever, how are we going to get out of the city. Well, I happen to notice on the map on the back that if you live in	

Comment Number	EIS Section Number	Commenter	Comment	Response
			this area of Brookland or any place in between on North Capitol and Michigan you either go out Georgia Avenue or Rhode Island Avenue and somehow North Capitol is left off. You don't go out North Capitol. And I guess they're recognizing from their own propaganda here that it will be completely unusable and that's now, not in the future sometime. I just wanted to point out quickly that this EIS is not in a development vacuum. There is a development proposed for the McMillan Reservoir which is horrendous. It doesn't take into account the current development going on or expansion on the campus of the Medical Center and they're building a 1500-car parking building right now on the corner of First and Michigan.	

Comment Number	EIS Section Number	Commenter	Comment	Response
			It doesn't take into account the six or seven acres that were up for development at the corner of Irving and Michigan and they are still up for development. The Hilton outfit was going to build a convention center and hotel there but now it's up for grabs, six or seven additional, and Catholic University owns two or three city blocks that are up for development. So I just wanted to point out the traffic here is going to be a huge and unsolvable issue	
238.	4.4	Stephens, Arlus J. Hoffman, Sandra	Moreover – and of particular concern to those neighbors left out of the communications loop in Wards 1 and 4 -- the transportation impact study of the EIS has not considered the impact of increased traffic on side streets between the affected AFRH property and Georgia and New Hampshire Avenues, NW.	The scope of the transportation analysis was approved by the DC Department of Transportation.

Comment Number	EIS Section Number	Commenter	Comment	Response
			Based on some of the proposed development plans, the impact of the increased traffic will not be confined to the main streets currently studied in the EIS. The neighborhoods to the west of the AFRH property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The EIS has not considered the impact of increased traffic on loss of recreational services provided by streets in Petworth and Park View. In addition, the District of Columbia government has recognized that there is a serious problem with pedestrian deaths from automobiles on city streets. Bringing a large number of automobiles into narrow residential streets will likely	

Comment Number	EIS Section Number	Commenter	Comment	Response
			increase the mortality rate in the area to the west of AFRH, particularly because of the relatively large number of elderly and children.	
239.	4.4	Sullivan, Matthew	The effect of increased traffic is not sufficiently explored in the EIS. More detail and study, including of potential mass transit hubs, needs to be included in the final EIS.	The EIS uses accepted professional standards for assessing the impacts of traffic and transportation. No decisions on the development of the AFRH have been made and no developers have been selected. The traffic analysis included in the draft EIS is based on the broad types of development included in the draft Master Plan Alternatives. Traffic levels represent the worst case scenario for each alternative.
240.	4.4	Swanson, Lisa	The EIS notes the relatively poor public transit options nearby. Though the entrances to the site are barely within	The Master Plan will include circulation plans including pedestrian walkways within the AFRH-W.

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			walking distances of Metrorail stations, they are underserved by buses, with one route running along the northwest gates, two along the south, and none along the eastern perimeter. Thus the development options evaluated rely on acres of parking; Plan 2, the most extensive, considers building 17 thousand parking spaces. Yet there is no inclusion in any options for bikeways and pedestrian walkways to or within the existing perimeter. The Washington Post of 22 June included an article proposing extensive new development (though in a completely different type of site at a Metrorail station, and outside the Beltway) designed to discourage the use of cars ("Mini-City Plan Discourages Use of Cars," Metro, June 22). This	

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			would introduce a radical rethinking of development within the metropolitan area, but a necessary one for the health of the city.	
241.	4.4	Swanson, Lisa	And the second thing that jumped out at me was this number that's come up a couple times, 17,000 parking spaces. I think the Home Depot maybe has 500 or 800, something like that, so 17,000 is phenomenal and that to me is a huge problem. The statement mentioned that there are three Metro stations close by. I think they're walkable, not everybody thinks they're walkable, but this area is completely underserved by buses, as the previous guy mentioned or someone else did, two near the hospital, one on Rock Creek Church, zero buses on North Capitol. So if somebody is planning on needing	The parking spaces listed under each of the Master Plan Alternatives are worst case scenarios. The AFRH would require a developer to prepare a transportation management plan detailing strategies to reduce single occupancy vehicle use.

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			17,000 parking spaces they are thinking about a lot of traffic and I know that's the maximum. Today's Washington Post has a story that I hope everybody would look at. The title alone is exciting to me, "Mini-city Plan Discourages Use of Cars." There is a plan underway right now in Vienna, Virginia, to completely rethink the use of cars in an urban area.	
242.	4.4	Tulchin, Drew	The increase in as many as 50,000 people on this space does not consider reasonable physical space for parking, attractive building, and quality of life for work or living. We expect federal standards of parking of 1:5 ratio and other federal requirements be established for mitigation.	Until designs are developed, the number of parking spaces required is unknown.
243.	4.4	Valenti, Cliff	Traffic considerations do not include increases from the Lincoln Cottage, or the hotel planned for the sight, not to	See response to comment #222. The traffic analysis did consider increased trips from the Lincoln Cottage and

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			mention that it is far enough away from the metro station that most people aren't going to walk, but drive. Additionally, it does not include an assessment of how traffic will be impacted from the new projects already slated for Georgia Avenue, Columbia Heights, and Petworth.	surrounding planned development. Traffic associated with the Lincoln Cottage would arrive throughout the day and not during peak hours when traffic congestion is at its worst. In accordance with accepted professional standards, peak hour traffic is analyzed to determine the worst-case traffic impact.
244.	4.4	Van Wye, Brian	Traffic congestion must be anticipated and mitigated so that impact is zero or negligible.	Mitigation to minimize traffic impacts would include roadway improvements which would be financed by the development of the AFRH-W. In addition, as part of any development agreement, AFRH would require a developer to prepare a transportation management plan detailing strategies to reduce single occupancy vehicle use.
245.	4.5	Donahue, Kathleen	The topic of air temperatures is not addressed in the DEIS. The reduction of green space and increase in heat-	Under the Master Plan Alternatives, impervious surfaces on the AFRH-W would increase between 34 and 37 acres.

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			reflecting surfaces, automobiles, and utility use is likely to increase the air temperature in the area. This can have dramatic impacts on health, utility use, and safety, especially for the elderly, for nearby residents.	Approximately 182 to188 acres (67 to 70 percent) of the AFRH-W would remain in open space. Because the region surrounding the AFRH is urbanized, the additional impervious area on the AFRH-W would have a minor effect on air temperature.
246.	4.5	Maclin, Elizabeth	Increased temperatures will worsen the impact of the increased automotive exhaust associated with the proposed development by promoting local ground level ozone formation.	Under the Master Plan Alternatives, impervious surfaces on the AFRH-W would increase between 34 and 37 acres. Approximately 182 to188 acres (67 to 70 percent) of the AFRH-W would remain in open space. Because the region surrounding the AFRH is urbanized, the additional impervious area on the AFRH-W would have a minor effect on air temperature.
247.	4.5	The Potomac Conservancy	Second, the proposed development adds to the problem of poor air quality in the metropolitan area. The proposal will	Air quality impacts from vehicular traffic have been assessed in Section 4.5 of the EIS. As stated in this section,

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			add 3,000 to 5,000 additional vehicles in the morning and evening commutes. The increase in vehicles adds to the already poor quality of air in the region through emission of pollutants. Traffic and parking is already a problem in this area. The stationary sources proposed to the land on AFRH-W will also increase levels of pollutants emitted into the air.	none of the Master Plan Alternatives would exceed National Ambient Air Quality Standards for mobile sources.
248.	4.6	AFRH Master Plan Committee	Chapter 4, page 4-62, Noise Proposed Action Alternatives 2, 3A, 3B, and 4 What are the specific plans to protect AFRH-W residents from short and long range noise pollution?	Noise impacts to AFRH-W residents would occur confined to the period of construction activities. Mitigation measures for construction noise impacts are provided in Section 4.6 of the EIS.
249.	4.6	Felder, Charles	How long a period will the short term construction be that will seriously affect the health, life spans and peaceful lives of the residents? Is there any way at present to assess any	Noise impacts to AFRH-W residents would occur confined to the period of construction activities. The period of construction is approximately 10 years; however, it should be noted that this

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			mitigating measures?	construction will not be continual and will take place in different locations on campus with varying distances from resident facilities. Mitigation measures for construction noise impacts are provided in Section 4.6 of the EIS.
250.	4.7	Donahue, Kathleen	The existing workload of WASA could be impacted by the installation of new public water and sewer lines for the development. The ongoing replacement of existing lead service lines may be slowed as a result, prolonging exposure of city residents to unsafe lead levels.	New water and sewer lines within the AFRH-W would be constructed by the developer.

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Appendix A

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401

December 1, 2004

Ms. Robin W. Griffin
Greenhorne & O'Mara, Inc.
9001 Edmonston Road
Greenbelt, MD 20770

RE: Master Plan at the U.S. Armed Forces Retirement Home, Washington, DC

Dear Ms. Griffin:

This responds to your letter, received October 26, 2004, requesting information on the presence of species which are federally listed or proposed for listing as endangered or threatened in the above referenced project area. We have reviewed the information you enclosed and are providing comments in accordance with section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

Except for occasional transient individuals, no proposed or federally listed endangered or threatened species are known to exist within the project impact area. Therefore, no Biological Assessment or further section 7 consultation with the U.S. Fish and Wildlife Service is required. Should project plans change, or should additional information on the distribution of listed or proposed species become available, this determination may be reconsidered.

This response relates only to federally protected threatened or endangered species under our jurisdiction. Limited information is currently available regarding the distribution of other rare species in the District of Columbia. However, the Nature Conservancy and National Park Service (NPS) have initiated an inventory of rare species within the District. For further information on such rare species, you should contact Marcus Koenen of the DC Natural Heritage Program at (202) 342-1443 ext. 216.

An additional concern of the Service is wetlands protection. Federal and state partners of the Chesapeake Bay Program have adopted an interim goal of no overall net loss of the Basin's remaining wetlands, and the long term goal of increasing the quality and quantity of the Basin's wetlands resource base. Because of this policy and the functions and values wetlands perform, the Service recommends avoiding wetland impacts. All wetlands within the project area should be identified, and if alterations of wetlands is proposed, the U.S. Army Corps of Engineers, Baltimore District, should be contacted for permit requirements. They can be reached at (410) 962-3670.

We appreciate the opportunity to provide information relative to fish and wildlife issues, and thank you for your interests in these resources. If you have any questions or need further assistance, please contact Maricela Constantino at (410) 573-4542.

Sincerely,

G. H. Moser

G. Andrew Moser
Program Supervisor, Threatened and Endangered Species

Armed Forces Retirement Home
Master Plan Environmental Impact Statement

Scoping Summary

This document provides a summary of actions undertaken by the Armed Forces Retirement Home (AFRH) to provide Federal and local agencies, the public, and potentially affected parties an opportunity to participate in a process called "scoping." During this process, AFRH solicited comments on the scope of the issues, probable impacts, and possible alternatives to be considered in the AFRH – Washington Master Plan.

This document includes, a summary of the scoping process, a description of the Public Scoping Meeting, a summary of comments received during the scoping process, and copies of scoping materials including:

- Notice of Intent
- NOI Letter with Address List
- NOI Proof of Publication: Washington Post
- Letter to AFRH Residents
- Public Notice Post Card
- Town Hall Presentation
- Public Meeting Presentation
- Public Meeting Attendance Sheets
- Public Meeting Comment Sheet
- Public Meeting Handout
- Public Meeting Displays
- Public Comments – Letters And Comment Forms

AFRH issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) on August 17, 2004. The NOI described the proposed action and set September 17, 2004 as the deadline for submitting scoping comments. The NOI was published in the Federal Register as well as in the Washington Post.

NOI letters were mailed to 185 Federal and local agencies, public officials, community groups, special interest groups, and area residents. The letters included information on the Public Scoping Meeting and provided instructions for submitting comments to AFRH. Postcards announcing the public meeting were distributed by hand to all properties abutting the AFRH.

A Town Hall meeting was held on September 8, 2004 for residents of the AFRH-Washington. Tim Cox presented information on the proposed Master Plan and the EIS scoping process. Residents were given the opportunity to ask questions. Comment forms were provided to those who wished to make formal scoping comments.

Public Scoping Meeting (Open House)

Date & Time: September 9, 2004
Location: AFRH – Washington, Sherman Building
Project Team Attendees:

Tim Cox, AFRH	Stephen Schwartz, GSA
Steve McManus, AFRH	Thomas Otto, GSA
Joseph Woo, AFRH	Pamela Wessling, AEW
Sheila Abarr, AFRH	Bill Petragallo, AEW
Don Dailey, AFRH	Emily Eig, EH Traceries
Craig Wallwork, GSA	Joan Glynn, G&O
Nancy Czapek, GSA	Elizabeth Estes, G&O
Denise Decker, GSA	Emily Lux, G&O

On Thursday, September 9, 2004, the AFRH held an Open House for the AFRH residents from 3:30 to 5:30 pm and for residents and the public from 6:30 to 8:30 p.m. Approximately 53 people attended the meeting. Poster boards were displayed showing the project location; draft master plan concept; a history of the 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 meeting attendees. A PowerPoint presentation was also run 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.

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Summary of Scoping Comments		
Date	**Commenter**	**Comment**
Via Tape Recorder	Robert Hill, AFRH Resident	• Would like things to stay basically intact even while striving to keep the home alive • Hopes environmental changes are not too drastic or severe • Would like views at north end to still be ornate and beautiful • Understands there will be buildings everywhere at north end • Would like to still be able to see the American flag on the flagpole; this is very important
9/14/04	James F. Caldas, Medstar	• MedStar/WHC fully supports the concept of development of the south land not otherwise needed by AFRH. Appropriate development compatible with AFRH and neighboring uses is important for the efficient use of land to benefit the community and City as a whole. • City has limited large tracts of land for development; a variety of possibilities should be considered that maximize the benefits to the community both financially and substantively; because of the character of the land use south of Irving, medical, educational, research and other related institutional uses should be considered; MedStar/WHC intends to pursue this opportunity • The major street arteries provided excellent access to the site; a relatively high density should be accommodated as long as residential areas are protected; the characteristics of the site, with large opens spaces, make urban density appropriate so as to counteract urban sprawl • Metro's Red Line is sufficiently close to the site that shuttle bus service benefiting all in the immediate community would reduce traffic • The clinical and research components of MedStar/WHC's plan have a unique compatibility with the mission of the home and could assist in providing or coordinating development for the important site. • The site would allow the expansion and renovation of the WHC facilities, which can become a model for the delivery of medical services in a post-9/11 world in an urban center vulnerable to terrorist attacks • From an environmental and historic preservation standpoint, the AFRH property is large enough to address issues that are likely to be considered. Development should occur at the southeast, south, west, and northwest portions of the property as generally outlined by AFRH. • Would like to receive a copy of the EIS

Summary of Scoping Comments		
Date	**Commenter**	**Comment**
	Ken Collier, AFRH Resident	• Safety and security – staffing and training seem inadequate presently; there are multiple examples of unidentified individuals roaming buildings and ground. Also residents are checked at gate, but delivery trucks, etc. are wave through • Many examples on grounds of safety hazards; trip hazards; too hot water; faulty furniture
	Leroy G. Cougle, Associated Training Systems (Two comment forms)	• What affect will increased population density have on the pond & water flow (to and from the pond)? • What structures, facilities, etc. should be prohibited to protect the integrity of the water quality and flow? • What impact will increased population density have on the wildlife living within the confines of the home? • Will the environmental study be completed before the master plan is developed? If not will a supplemental environmental study be completed and subjected to public review?

Summary of Scoping Comments		
Date	**Commenter**	**Comment**
	Mark Ewert	• Green space and view of the AFRH property greatly increases the value of my home, both financially and in my quality of life • Not opposed to the idea of developing parts of the home; however, is concerned about the details of that development and how it will affect home and surrounding neighborhood • Right across the street, residential development is suggested. If this occurs, the following design concepts would reduce the impact of the new development: – Not disturbing the stone and brick fence. New homes where the driving range now exists might reasonably be accessed using the existing (now blocked) entrance from Rock Creek Church Road just above where Illinois Avenue meets it – The height and size of new buildings be restricted to reflect those of the surrounding neighborhood. This would mean that buildings are not over 4 – 5 stories tall and that single buildings are not massive in square footage – Low income housing (projects) not be built here, as this would decrease property values and would not improve our neighborhood – The new buildings be built a respectable distance from the existing fence so that they do not loom over Rock Creek Church Road – Larger and specimen trees in the area to be developed be avoided and built around as much as possible – The architectural style of the new buildings reflects the historic nature of the site and some of the historic buildings in the vicinity (on the AFRH property) Disappointed with lack of publicity for public scoping meeting
	Hal Grant, NAVS	• Would like a copy of the EIS • Would like a map/sketch of proposed areas for disposal and development
	William Jentarra, AFRH Resident	• Would like copy of the EIS
	Frank McCabe, AFRH Resident	• The walking trails throughout the open areas should be considered as physical and mental therapy for the residents and thereby preserved • The Grant Building should be renovated and used for the relocation of residents of the Piper and LaGarde Buildings

Summary of Scoping Comments		
Date	**Commenter**	**Comment**
9/9/04	Wilfred McCarty	• Good to have green plot of land in the middle of the District. If there is ever a terrorist attack or national emergency this is a good place for government officials, the Mayor, police, firemen, troops to establish temporary headquarters or get first aid. During the riots it was used by troops to come in, set up tents, and help. Guards can be put at the gates. LaGarde Hospital could be used in emergencies. • Good to have breathing space in the District • Once land is sold and the money spent you have nothing • If it is at all possible get funds from corporations, and they get a tax break
9/28/04	Jim Pankey, AFRH Resident (Gulfport)	• On the draft master plan concept, do the areas designated for residential development include Scott Hall? • Does 'Resident' mean resident or does it include staff or housing for other than authorized residents?
9/15/2004	Donald M. Pence	• Sale of AFRH-W property not in the long term best interests of the home; advocates long term lease with reversion to home • Does not support replacing the LaGarde Building due to age of the building; LaGarde should serve its purpose for another 10 to 15 years; cost not justified by savings in transportation cost • Presence of commercial development or real estate persons in the decision making process is a concern; understands if their participation is purely advisory, but not in a decision making role • Generally agrees with the concept of and objectives of the master plan • Concerned that perpetuation of the home for its historical purpose will be in jeopardy if further transfer of real estate holdings occurs
	John E. Price, AFRH Resident	• Parking is a problem • Management works and parks in their own area so they are unaware of the conflict • Lower ranked employees, tenants, visitors, guests and of course residents are left to battle over the few decent parking spots left • If all activities from the south end of the campus (King Health center, etc.) are consolidated along with various new tenants to the north end of the campus, where are of these people going to park?

Summary of Scoping Comments		
Date	**Commenter**	**Comment**
9/9/04	Mimi Rivkin, AFRH Resident	• One development plan should expand and improve the golf course with a nice club house as a private "city golf club"; approach a well known golfer to redesign and sponsor it; this may eliminate some building areas but would be an incentive to other residential, hospital, and "mission" tenants • Turn homes on "generals' row" into bed and breakfast inns, cocktail lounge, commissary, shops, meeting rooms, pharmacy, CVS, outlet shops, etc.
9/14/04	Mimi Rivkin, AFRH Resident	• The plans to construct a new long term health center joining the Scott and Sheridan buildings at the point of their right angle should eventually be beneficial to the residents as well as being economical • Construction will take place directly within the living, eating, and activity areas of the elderly residents in both buildings, many of whom have respiratory problems. During construction, which will surely take over a year, the air will be fouled with dust and debris, reaching into windows and vents; and noise will be intolerable. This pollution could severely affect the health of residents – especially since independent living residents have no on-site emergency, pharmaceutical system evenings, weekends and holidays. • When will construction begin and what plans do you have to protect or relocate approximately 800 residents during the period of construction?
	Leroy Smith, AFRH Resident	• Get funding from defense contractors (e.g. Lockheed Martin) • Give presentation to contractors • Establish logo showing partnership • Get donations annually • Possible logo "We serve for those who served"
	William D. Woods, AFRH Resident	• Should use land on AFRH for extension of the Soldiers Home Cemetery • The Master Plan, if carried out, would cause more congestion forever • Instead of turning the land over to developers, better steps can be taken in the national interest

Summary of Scoping Comments		
Date	**Commenter**	**Comment**
9/16/2004	Angela Washington	• Resident of Parkview • Not informed of scoping meeting; requests extension of scoping period and a second public scoping meeting • Following should be considered in the scoping process: - Height restrictions for structures erected across from existing residential homes - Effects of new infrastructure on existing infrastructure - Preservation of green space on the north and west boundaries - Damage to existing foundations of residential homes - Health effects on residents as a result of such a massive undertaking; liability for future illnesses - Efforts to control dust and dirt that might invade residential homes - Noise pollution - Reasonable timetables for construction and residential inconvenience - Effort to identify through historic research anything additional on the site that has not yet been officially identified as preservable due to its history - Effort at a cooperative-mix to leave residential areas as unencumbered as possible in keeping with the established "Parkview" concept - Redrawing the location of structures such as cultural, foreign missions, institutional and commercial to areas such as the east and south side of the campus where residential areas would not be substantially impacted by such entities operations - For residential, if there is construction along the north and west sides of the campus, structures should be set back far enough from the street and spaced apart from one another to adhere to the "Parkview" theme - Preservation of the existing trees, etc. on the structure - Runoff, drainage and erosion concerns on existing homes and personal property - Effect on existing parking and traffic issues

Summary of Scoping Comments		
Date	**Commenter**	**Comment**
9/17/04	Local Residents	• Not informed of scoping meeting; requests extension of scoping period and a second public scoping meeting • EIS should consider: – Air pollution brought by increased traffic – Noise pollution – Groundwater runoff – View sheds being destroyed – Trees being removed – Wildlife being displaced – Geological disruption to the area due to digging, blasting, pounding, etc. – Interference with historical landmarks – Archeological resources – Social and economic resources – Health concerns and inconvenience of construction on adjacent communities – Architectural integrity with existing structures – Height restrictions on any new potential structures – Public/community access to green space – Potential structural or foundational damage to historic properties or neighboring structures – Security impacts on adjacent communities – Potential introduction of hazardous materials – Potential impacts on utilities – Green space and open space being permanently altered – Impact of adding further congestion to neighborhoods that are already among the most densely-populated areas of the East Coast

Summary of Scoping Comments		
Date	**Commenter**	**Comment**
9/17/04	National Trust for Historic Preservation	• Request participation as a consulting party for the master planning project under Section 106 of the NHPA • Request opportunity to comment on any documents prepared under NEPA • Urges AFRH to proceed with great sensitivity when changing the nature of the historical treasure represented by the entire campus • Master plan should balance the needs of the AFRH with the property's natural beauty and unique historic value • Offers to lend technical assistance

Summary of Scoping Comments		
Date	**Commenter**	**Comment**
9/17/04	National Capital Planning Commission	• Within the District all federal planning and actions affecting federal interest must be reviewed by the NCPC • North Capital Street corridor is an important viewshed landmark and gateway to the Nation's Capital, and improving the potential land use activity and transportation infrastructure along this important gateway into the city is a policy goal of the NCPC Comprehensive Plan • The proposed Master Plan should adhere to the Comprehensive Plan and the NCPC submission requirements • Substantial removal of vegetation would not be supported by the Comprehensive Plan • Impervious surfaces should be limited • Design of roads, parking, pedestrian surfaces, and building pattern development should be determined in association with the Commission • Prior to excessing property, use for federal or non-federal public activities , including use for Foreign Missions, should be explored • If excessed, future use should be coordinated with surrounding development patterns and land uses and planning should contribute effectively to existing community development goals • Master planning effort should verify participation, in consultation with local preservation offices and provide for an opportunity for public involvement. • Effort should anticipate preparation of management plans to provide in-depth procedures for the treatment of historic resources within the existing recorded historic district of the AFHR • Request that NCPC be identified in the EIS as a cooperating agency

Print OK

AFRH Plan

From: <James.F.Caldas@Medstar.net>
To: <craig.wallwork@afrh.gov>
Cc:
Subject: AFRH Plan
Sent Date: Sep 14, 2004 12:28 PM
Received Date: Sep 14, 2004 12:28 PM
Priority: Normal
Attachments:

I appreciated the opportunity to attend the AFRH-Washington Master Plan Scoping Meeting held on September 9th and have the oflowing comments to offer regarding the proposed plan:

1. MedStar/WHC fully supports the concept of development of the south land not otherwise needed by AFRH. As a the owner and operator of the medical complex on land immediately to the south across Irving Street, N.W., we believe that appropriate development compatible with AFRH and neighboring uses is important for the efficient use of land to benefit the community and City as a whole.

2. This City has limited large tracts of land for development. When large parcels become available for use, a variety of possibilities should be considered that maximize the benefits to the community both financially and substantively. Because of the character of the land use south of Irving, medical, educational, research and other related institutional uses should be considered. MedStar/WHC intends to pursue this opportunity.

3. The major street arteries adjacent to the site, such as North Capitol Street, Irving and Michigan Avenue provide excellent access to the site. A relatively high density should be accommodated so long as residential areas to the north west are protected. The characteristics of the site, with large open spaces, make urban density appropriate so as to counteract urban sprawl. Metro's Red Line is sufficiently close to the site that shuttle bus service benefiting all in the immediate community would reduce traffic.

4. The clinical and research components of MedStar/WHC's plan have a unique compatibility with the mission of the home and could assist in providing or coordinating development for this important site. In addition, the site would allow the expansion and renovation of the WHC facilities, which can become a model for the delivery of medical services in a post-9/11 world in an urban center vulnerable to terrorist attacks.

5. From an environmental and historic preservation standpoint, the

AFRH property is large enough to address issues that are likely to be considered. Development should occur at the southeast, south, west and northwest portions of the property as generally outlined by AFRH.

Thank you for the opportunity to comment. I would appreciate receiving a copy of the environmental impact statement when it becomes available

AFRH

Protecting a Promise
Renewing the Trust



Environmental Impact Statement for the
Proposed AFRH-Washington Master Plan
Scoping Comments

Name: Ken Collier
Address: Box 475 AFRH W
Affiliation: Resident
Phone: 202 829-4754

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☐ Yes ☑ No

Comments

Safety & Security - Staffing & Training, Stem inadequate presently. There are multiple examples of unidentified individuals roaming buildings & grounds. Also, residents are checked at gate, but delivery trucks, etc., waved thru.

Many examples on grounds of safety hazards: tipping, too hot water (Sorry about this one) faulty furniture.

This info is only submitted as a tool for planning, not a complaint.

Please send comments to:

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov
Comments must be postmarked by September 17, 2004

AFRH

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Renewing the Trust



Environmental Impact Statement for the
Proposed AFRH-Washington Master Plan
Scoping Comments

Name: LeRoy G. Cougle

Address: 3700 NORTH CAPITOL ST. NW #1072 WASHINGTON DC 20011

Affiliation: ASSOCIATED TRAINING SYSTEMS

Phone: 202-882-4108

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

WHAT AFFECT WILL INCREASED POPULATION DENSITY HAVE ON THE POND & WATERFLOW (TO & FROM THE POND). ALSO WHAT STRUCTURES, FACILITIES, ETC SHOULD BE PROHIBITED TO PROTECT THE INTEGRITY OF THE WATER EQUALITY & FLOW. ALSO WHAT IMPACT OF THE WILD LIFE LIVING WITHIN THE CONFINES OF THE HOME WILL INCREASED POPULATION DENSITY HAVE.

Please send comments to:

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov
Comments must be postmarked by September 17, 2004

AFRH

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Renewing the Trust



Environmental Impact Statement for the
Proposed AFRH-Washington Master Plan
Scoping Comments

Name: LEROY G. COUGLE

Address: 3700 NORTH CAPITOL ST. NW #1072 WASHINGTON, DC 20011

Affiliation: ASSOCIATED TRAINING SYSTEMS

Phone: 202-882-4158

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

WILL THE ENVIRONMENTAL STUDY BE COMPLETED BEFORE THE MASTER PLAN IS DEVELOPED. IF SO WILL A SUPPLEMENTAL ~~DRAFT~~ ENVIRONMENTAL STUDY BE COMPLETED & SUBMITTED TO PUBLIC REVIEW.

Please send comments to:

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov
Comments must be postmarked by September 17, 2004

AFRH

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Environmental Impact Statement for the Proposed AFRH-Washington Master Plan Scoping Comments

Name: MARK EWERT

Address: 401 ROCK CREEK CHURCH RD NW/WASH DC 20011

Affiliation: NEIGHBOR

Phone: (202) 722-8888

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

PLEASE SEE ATTACHED SHEET

Please send comments to:

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov
Comments must be postmarked by September 17, 2004

Environmental Impact Statement
for the Proposed AFRH-Washington Master Plan
Scoping Comments

Comments

My home on Rock Creek Church Road faces the AFRH driving range. As a resident of the Petworth neighborhood and neighbor to AFRH, I have a number of concerns about the development of parcels of AFRH land. Right now the green space and view of the AFRH property greatly increases the value of my home, both financially and in my quality of life. I am not opposed to the idea of developing parts of the Retirement Home land. However, I am concerned about the details of that development and how it will affect my home and the surrounding neighborhood. For instance right across the street and from me, residential development is suggested. If this comes about the following design concepts would reduce the impact of this new development for my neighbors and me:

- Not disturbing the stone and brick fence, which surrounds this part of the AFRH. This would mean that new homes where the driving range now exists might reasonably be accessed using the existing (now blocked) entrance from Rock Creek Church Road just above where Illinois Avenue meets it.
- The height and size of new buildings be restricted to reflect those of the surrounding neighborhood. This would mean that buildings are not over 4-5 stories tall and that single buildings are not massive in square footage.
- Low income housing (projects) not be built here, as this would decrease property values and would not improve our neighborhood.
- The new buildings be built a respectable distance from the existing fence so that they do not loom over Rock Creek Church Road.
- Larger and specimen trees in the area to be developed be avoided and built around as much as possible.
- The architectural style of the new buildings reflects the historic nature of the site and some of the historic buildings in the vicinity (on the AFRH property).

I appreciate being invited to the Public Scoping Meeting and realize that any development is subject to comprehensive design and approval process involving many parties and agencies. I will look forward to hearing more comprehensive details about the project as it develops.

I must say at the outset that I was very disappointed in the lack of publicity for the Scoping meeting. There was only one other member of the public there when I visited on the evening of September 9. In addition, the postcard I received gave no indication that the meeting could only be accessed from the one functioning entrance to the AFRH, on Rock Creek Church Road. No directions were given and the only address sited was one on North Capitol Street (which was not useful). This might give the impression that there was little concern for surrounding neighbors reaching the meeting and that a process was being carried out merely to fulfill the requirements of the NEPA process. I trust this was

not the case and that better directions (and publicity) will be given for future public events.

At the meeting I saw a mock up of a master plan on a placard. I would like to have a copy of that map, which showed the areas under consideration for development and their potential development types. This could be made available electronically of in hard copy. Please let me know how I can get a copy of this preliminary design concept.

Your good neighbor,

Mark Ewert

(please see attached sheet with contact information)

AFRH

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Renewing the Trust



Environmental Impact Statement for the
Proposed AFRH-Washington Master Plan
Scoping Comments

Name: HAL GRANT

Address: 5535 HEMPSTEAD WAY, SPRINGFIELD, VA 22151

Affiliation: NAVS

Phone: 703-750-1342 EXT. 3005

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

WOULD ALSO LIKE A MAP/SKETCH OF PROPOSED AREAS FOR DISPOSAL AND DEVELOPMENT

Please send comments to:

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov
Comments must be postmarked by September 17, 2004

AFRH

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Environmental Impact Statement for the
Proposed AFRH-Washington Master Plan
Scoping Comments

Name: WILLIAM ZENTARRA
Address: 3700 N. CAPITOL ST. NW #588
Affiliation: AFRH-W
Phone: 202-723-2355

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

Please send comments to:

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov

Comments must be postmarked by September 17, 2004

AFRH

Protecting a Promise
Renewing the Trust



Environmental Impact Statement for the
Proposed AFRH-Washington Master Plan
Scoping Comments

Name: FRANK McCABE

Address: AFRH-W-79 3700 N. CAPITOL ST. N.W. WASH D.C.

Affiliation: AFRH-W

Phone: 6313 SCOTT BLDG.

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

1. The walking Trails Throughout The Open Area's should be considered as Physical and Mental Therapy For the Residents and thereby Preserved.
2. The Grant Bldg should be Renovated and used For The Relocation of Residents of The Pipes and Ice Guard Bldgs.

Please send comments to:

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov
Comments must be postmarked by September 17, 2004

Note: forwarded message attached.

Do you Yahoo!?
Express yourself with YI Messenger! Free. Download now.

included message:

From: "WILFRED MCCARTY" <macsan400@yahoo.com>
To: "knapsack Mac" <macsan400@yahoo.com>
Cc:
Subject: Environmental Impact Statement
Sent Date: Sep 9, 2004 11:55 AM
Priority: Normal
Attachments:

Environmental Impact Statement 9 Sept 2004
Name Wilfred "Mac" McCarty AFRH-W 400 3700 N. Capital St. N.W. Washington, D. C. 20011-8400
Environmentally (if there is such a word) it is good to have this green plot of land in the middle of the District. If there is ever a te rrorist attack or national emergency this is
a good place for government officials, the Mayor, police, firemen, troops to establish
a temporary headuarters and get emergency first aid. During the riots it was used by
troops to come in, set up tents, and help. Guards can be put at the gates. The beautiful LaGarde Hospsital building could be used in emergency
It is good to have this breathing space in the District. Once land is sold and the
money spent you have nothing. The District would lose breathing space if commercial
buildings are put up here.
If it is at all possible to get funds from corporations (and they get a tax break) I would prefer this route or some other way to get funds.
I have been at the home since 1967. I came for medical ressons and now that I
am 80 need it more. I appreciate the home and love the home and hate to see
us lose this breathing space.

A Germn 88 shell and tried to share the same space in the Battle of the Bulge
After being operated on I was sent back to same unit. We liberated Mauthausen
Concentration Camp in Austria a few days before VE day and stayed there for
five weeks burying the dead etc. We stayed sos the Russians would not take
over this area.
Respectfully yours, Wilfred "Mac" McCarty

Do you Yahoo!?

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I thank you for illustrating a few gray areas--but am wondering about the 'residential' designations, particularly in the lower left of the "Alternatives' illustration, and the gray area above it (over the fishing ponds) labeled 'Residential or Foreign Missions'--

'Residential' as indicated in the gray area to the center right--I'm unfamiliar with the location described, and wondered if it includes Scott Hall.

Does 'Resident' mean Resident or does it include Staff or housing for other than authorized residents.

Thanks

Jim Pankey, USN (Ret.)
wildspirit@cableone.net
Resident, AFRH Gulfport

Environmental Impact Statement for the
Proposed AFRH-Washington Master Plan
Scoping Comments

Name: DONALD M. PENCE
AFRH - W 731

Address: 3700 N. Capitol St. NW
Washington, DC 20011-8400

Affiliation: Resident at AFRH-W

Phone: (202) 8298473

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments : My concerns are three fold.

1. I feel that sale of AFRH-W property is not in the long term best interests of the home, for both financial and perpetuation reasons. I advocate long term lease with reversion to the home at conclusion.

2. I do not feel that replacing the LaGarde Building with another facility in closer proximity to the Dormitory buildings is a wise move in the near term. The LaGarde facility due to its recency of construction should serve its purpose for another 10 to 15 years. To justify the cost of a new facility on the basis of savings in transportation costs, I feel is a false economic decision.

3. The presence of commercial development or real estate persons in the decision making process, concerns me. I can understand their participation in a purely advisory capacity, but not in the decision making process. The axe they have to grind is not the axe of AFRH-W.

OTHER THAN ABOVE, I GENERALLY AGREE WITH THE CONCEPT OF AND OBJECTIVES OF THE MASTER PLAN AS PROPOSED. MY CONCERNS ARE THAT THE PERPETUATION OF THE HOME FOR ITS HISTORICAL PURPOSE WILL DEFINITELY BE PUT IN JEOPARDY IF THERE IS FURTHER TRANSFER OF TITLE TO THE HOME'S REAL ESTATE HOLDINGS.

D Pence
Sept 15. 2004

Please send comments to:

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov
Comments must be postmarked by September 17, 2004

AFRH

Protecting a Promise
Renewing the Trust



Environmental Impact Statement for the
Proposed AFRH-Washington Master Plan
Scoping Comments

Name: JOHN E. PRICE

Address: AFRH - 72G

Affiliation: MEMBER - RESIDENT

Phone: 202-545-0763

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☐ Yes ☒ No

Comments

PARKING IS A PROBLEM. MANAGEMENT WORKS AND PARKS IN THEIR OWN AREA SO THEY ARE UNAWARE OF THE CONFLICT. LOWER RANKED EMPLOYEES, TENANTS, VISITORS, GUESTS AND OF COURSE RESIDENTS ARE LEFT TO BATTLE OVER THE FEW DECENT PARKING SPOTS LEFT. IF ALL ACTIVITIES FROM THE SOUTH END OF THE CAMPUS (KING HEALTH CENTER ETC) ARE CONSOLIDATED ALONG WITH VARIOUS NEW TENANTS TO THE NORTH END OF THE CAMPUS JUST EXACTLY WHERE ARE ALL OF THESE PEOPLE GOING TO PARK ???

Please send comments to:

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov
Comments must be postmarked by September 17, 2004

Suggestions for planning Sept 9, 2004

(1) Could one development plan be considered to expand and improve the golf course, with a nice club house, as a private 'city golf club'? Would it be possible to approach a well known golfer to redesign and sponsor it? It might eliminate some building areas, perhaps in the southeast portion (rather than over the hills leading to the Scott) but would be an incentive to other residential, hospital and 'mission' tenants.

(2) Many of us have looked longingly at those big white elephant homes on 'generals' row' and wished that they could be turned into Bed and breakfast inns, cocktail lounge, commissary, shops, meeting rooms, **pharmacy,** CVS, outlet shops, etc.

Sincerely,

Mimi Rivkin, Resident AFRH-W
Sheridan 3312
202-722-4050

9/14/'04

To: The COO, CFO and administrators of the Environmental Impact Study
CC: Capt. Ulmer, Capt. Soares, Mr. Dickerson, Dr. Rader
From: Mimi Rivkin

This regards a negative environmental impact on the elderly residents of the AFRH-W.

The plans to construct a new long term health center joining the Scott and Sheridan buildings at the point of their right angle should eventually be beneficial to the residents as well as being economical.

The construction will take place directly within the living, eating and activity areas of the elderly residents in both buildings, many of whom have respiratory problems. During construction, which will surely take over a year, the air will be fouled with dust and debris, reaching into windows and vents; and noise will be intolerable. This pollution could severely affect the health of residents- especially since independent living residents have no on-site emergency, pharmaceutical system evenings, weekends and holidays.

When will construction begin, and what plans do you have to protect or relocate approximately 800 residents during the period of construction?

I will appreciate a response at your earliest convenience, as I would like to inform the Resident Advisory Council, and subsequently reassure the residents.

Thank you for the opportunity to participate in the environmental impact study.

Respectfully,

Mimi Rivkin
Resident, Sheridan 3312
202-722-4050
AFRH-W (470), Washington DC, 20011-8400

Environmental Impact Statement for the Proposed AFRH-Washington Master Plan Scoping Comments

Name: Leroy Smith

Address: AFRH resident

Affiliation:

Phone: 202-723-0716

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☐ Yes ☐ No

Comments

Suggestion would be to go after companies that make defence weapons, tanks, etc.... These companies all take money from the defence department. This money could be used for the AFRH. A presentation a portion of should be presented to these companies. Constant contact should be taking place with to possibly receive money. By utilizing money from defence companies money could be obtained as early as one year. Once an agreement is made a logo should be created representing the partnership. The donation should be made annually. The defence companies would be more happy to give money. A possible logo could be "we serve for those who served!" One possible partnership to check into is Lockhead & Martin.

Please send comments to: Resident

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov

Comments must be postmarked by September 17, 2004

AFRH

Protecting a Promise
Honoring the Trust



Environmental Impact Statement for the
Proposed AFRH-Washington Master Plan
Scoping Comments

Name: William D Woods

Address: USSAN-1236 3700 N. Capital St N.W Wash D.C.

Affiliation: Resident Zip 20011-8400

Phone: 202 882 8633

Would you like to receive a copy of the Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

After some thought I think the land can better serve the AFRH and in the National Interest as an extention to the Soldiers Home Cemetery that will soon be closed.

In the past the Home has provided land to or for North Capital Street the Washington Medical Center, Childrens Hospital, Veterans Hospital and recently, 49 Acres to Catholic University.

In an already consested City, the Master Plan, if carried out, would cause more Consestion forever!

Instead of turning the land over to devolopers, better steps can be taken in the National Interest, —

Sincerely
Bill Woods

Please send comments to:

Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW,
Washington, DC 20011
craig.wallwork@afrh.gov
Comments must be postmarked by September 17, 2004

ANGELA WASHINGTON
3654 PARK PLACE N.W.
WASHINGTON, DC 20010

EMAIL ADDRESS: HULESQ@AOL.COM

September 16, 2004

VIA CERTIFIED MAIL
Armed Forces Retirement Home
Attention: Craig Wallwork
3700 North Capitol Street, NW
Washington, DC 20011

Re: **Motion to Hold A Second Meeting Due to Inadequate Notice to Prepare an Environmental Impact Statement for the Proposed Master Development Plan for the Armed Forces Retirement Home in Washington, DC. (Reference No. 69 FR 51231-02)**

Written Comments (Reference No. 69 FR 51231-02)

Dear Mr. Wallwork:

I am a homeowner in Parkview, a community of homes which abut the north and west boundaries (Rock Creek Church Road and Park Place, N.W) of the Armed Forces Retirement Home (also called "Old Soldiers' Home"). True to its name, I and other neighbors in this established community have for several years and for generations in many cases, enjoyed the vast scenic view of green space that is presented year round from the windows and the porches of our residential homes. These views include, but are not limited to, the unencumbered viewing of wild life such as flocks of ducks and geese that have lived for years in the Home while also providing the neighborhood the pleasure of watching our honored former soldiers enjoy daily peaceful walks over the acreage or working in their garden plots during the growing season.

MOTION

Within the past week, I was informed that a "public scoping meeting" was held on September 9, 2004. However, after speaking with "potentially interested individuals" in the surrounding community, no one was apparently notified by "direct mail correspondence" that the meeting was scheduled to occur. Thus, several residents that

would be interested in the environmental impact of any potential development were unaware of the meeting because we were not notified properly. Thus, pursuant to the guidelines published in the "Notice of Intent to Prepare an Environmental Impact Statement" published in the 69 FR. 51231-02, the requirements of Notice, which include the basic right of notice and the opportunity to be heard appear to not have been met. I and other interested residents that could be affected by any plan to develop the Old Soldiers' Home were not given the basic opportunity to participate in the process. Specifically, we were precluded from learning and hearing first hand about the process and were not able to orally address any environmental concerns. Accordingly in the interest of fairness, not to mention the law, I am requesting that the Armed Forces Retirement Home pursuant to the established guidelines set forth in the applicable federal rules and regulations hold another meeting where notice is properly given to all that are interested. Thus, this letter also officially serves as a **Motion to Hold A Second Meeting Due to Inadequate Notice to Prepare an Environmental Impact Statement for the Proposed Master Development Plan for the Armed Forces Retirement Home in Washington, DC.**

A second meeting properly noticed would provide *all* that are interested the opportunity to be personally present, briefed on the issues, the opportunity to orally comment and to timely present any written comments. Moreover, a second meeting, with all who have an interest in the development present, would show the good faith of the Home in involving the community in the planning process. I am requesting that the Armed Forces Retirement Home respond in writing to my motion according to the dictates of the law.

WRITTEN COMMENTS

Notwithstanding the fact that I was not properly noticed, and therefore do not have a complete understanding of what occurred at the September 9, 2004 meeting, I am submitting comments in accordance with the Notice that was published in the August 18, 2004 Federal Register.

The following are the points I want to be included and earnestly considered in the scoping process:

1. Height restrictions for any structures that might be erected across from existing residential homes.

2. Effects of new infrastructure on the existing infrastructure.

3. The preservation of the maximum amount of green space on the north and west boundaries (in light of the fact that this area is called "Parkview.")

4. Damage to existing foundations of residential houses.

5. The health effects on the residents as a result of such a massive undertaking; Liability for any future illness to residents resulting from such undertaking.

6. Efforts to control the dust and dirt that might invade residential homes.

7. Noise pollution

8. Reasonable timetables for construction and residential inconvenience.

9. An effort to identify through historical research anything additional on the site that has not yet been officially identified as preservable due to its history.

10. An earnest effort at a *cooperative-mix* to leave residential areas as unencumbered as possible in keeping with the established "Parkview" concept.

11. Redrawing the location of structures such as cultural, foreign missions, institutional and commercial to areas such as the east and south side of the campus where residential areas would not be substantially impacted by such entities operations.

12. With regard to residential, if there is construction along the north and west sides of the campus, that structures be set back far enough from the street and spaced apart from one another to adhere to the "Parkview" theme.

13. Preservation of the existing trees, etc. on the structure.

14. Runoff, drainage and erosion concerns on existing homes and personal property.

15. The effect on existing parking and traffic issues.

In the spirit of a cooperative effort that includes "interested individuals" who live in the Parkview community, I sincerely hope you will give sincere consideration to the above. Finally, I am awaiting a decision on my Motion. Thank you.

Sincerely,

Angela Washington

September 17, 2004

Mr. Craig Wallwork
Armed Forces Retirement Home
3700 North Capitol Street NW
Washington, DC 20011

Dear Mr. Wallwork:

We are writing this letter in regard to the "Notice of Intent to Prepare an Environmental Impact Statement" entered into the Federal Register on August 18, 2004 (Volume 69, Number 159).

First, we are requesting that the comment period for this item be extended 60 days and that another Public Scoping Meeting be held. We became aware of the Master Plan Concept for the Armed Forces Retirement Home as the result of one person in our neighborhood attending the September 9, 2004 Scoping Meeting.

We believe that few people in the neighborhood know about this plan even now. Those of us who are aware of it have not had enough time to discuss it with neighbors, make people in the neighborhood aware of what is going on, or assess all the factors that should be part of the scope of the process. We do not believe the managers of this process have made enough effort to make the neighborhood aware of the plan.

The Federal Register entry states that the scoping "will be accomplished through a public scoping meeting" and "direct mail correspondence." We are not aware of any direct mailings or broader advance notification to residents about this process. As residents of the community where the property in question is located, we believe that we qualify as "interested individuals," and we do not feel that there was a reasonable effort made to inform us of the September 9, 2004 Scoping Meeting. The poor attendance from the neighborhood at the meeting speaks for itself -- people were not aware of the meeting and therefore did not attend. We believe action is needed to uphold the integrity of the process and to ensure that people affected by the plan can participate.

In the event you reject our request, and we hope you do not, we want to include some suggestions of what to include in the scoping to ensure that we are not shut out of this process.

We believe you should consider the following:

- air pollution brought about by increased traffic,
- noise pollution,
- groundwater runoff,
- viewsheds being destroyed,
- trees being removed,
- wildlife being displaced,
- geological disruption to the area due to digging, blasting, pounding,etc.,
- interference with historical landmarks,
- archeological resources,
- social and economic resources,
- health concerns and inconvenience of construction on adjacent communities,
- architectural integrity with existing structures,
- height restrictions on any new potential structures,
- public/community access to green space,
- potential structural or foundational damage to historic properties or neighboring structures,
- security impacts on adjacent communities,
- potential introduction of hazardous materials,
- potential impacts on utilities,
- green space and open space being permanently altered, and
- impact of adding further congestion to neighborhoods that are already among the most densely-populated areas of the East Coast.

We sincerely hope that you will consider our request for greater involvement in this process. As residents who have lived in close proximity to the property in question for years, we feel we would be greatly affected by any development and therefore should be included in the scoping and planning process. We look forward to hearing from you.

Sincerely,

Erica M.G. Lagerson	3649 Warder Street NW Wash, DC 20010
[illegible]	3649 Warders St. N.W. Washington, DC 20010
[illegible]	3647 Warder St NW Washington, DC 20010
Marlyne Nougues	3647 Warder St NW Washington, DC 20010
Julie Cook	3646 Warder St NW Washington DC 20010
Siobhán Dugan	3646 Warder St. NW, Wash, DC 20010
[illegible] (ERIC LECOMPTE)	3646 WARDER ST. N.W. D.C. 20010
[illegible]	3646 Warder St. NW 20010
[illegible]	3658 WARDER ST. NW
Gordon S. Balad	3651 WARDER ST NW
Sandra Juarez	712 Rock Creek Church Rd NW Wash DC 200
Chemayn Gray	510 Irving St. NW - WASH DC 20010
[illegible] Sodette	703 ROCK CREEK CHURCH RD. NW
Kenneth Dorrell	701 Rock CREEK Church Rd NW
[illegible]	701 Rock Creek Church Rd NW
Michael Tubman	3647 Warder St, NW
Marija Balaé	3651 Warder St.
[illegible]	[illegible] Park Pl [illegible]

John K. Hughes 3656 Park Place N.W.

Ellen N. Hughes 3656 Park Place N.W.W 20010

John McCarney Jr 3670 Park PL NW 20010

Edith L. Parker 3650 Park Pl. N.W. 20010

Elaine M. Burgess 3660 Park Pl. NW. 20010

Kathleen Boylan 503 Rock Creek Church Rd. N.W. Wash D.C

Art Laffin 503 Rock Creek Church Rd NW WDC 20010 20010

September 17, 2004

Mr. Craig Wallwork
Armed Forces Retirement Home
3700 North Capitol Street NW
Washington, DC 20011

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- wildlife being displaced,
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- archeological resources,
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- health concerns and inconvenience of construction on adjacent communities,
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- height restrictions on any new potential structures,
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- potential introduction of hazardous materials,
- potential impacts on utilities,
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- impact of adding further congestion to neighborhoods that are already among the most densely-populated areas of the East Coast.

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Sincerely,

Mr. & Mrs. Kenneth Ambrose, Sr.



NATIONAL TRUST
for HISTORIC PRESERVATION™

Protecting the Irreplaceable™

September 17, 2004

Mr. Craig Wallwork
Project Manager
Armed Forces Retirement Home
3700 N. Capitol St. NW
Washington, DC 20011-8400
Fax: (202) 730-3335

RE: Armed Forces Retirement Home Master Plan
Request to Participate as a Consulting Party

Dear Mr. Wallwork:

As co-steward of the President Lincoln and Soldiers' Home National Monument, the National Trust for Historic Preservation (National Trust) is deeply interested in the future of the Armed Forces Retirement Home (AFRH). The collaborative relationship between the National Trust and AFRH has been very positive thus far, and we look forward to continuing that relationship throughout the upcoming master plan development. Accordingly, we hereby request participation as a consulting party for the master planning project under Section 106 of the National Historic Preservation Act (NHPA), 16. U.S.C. § 470f, pursuant to 36 C.F.R. §§ 800.2(c)(5) and 800.3(f)(3). In addition, we would like the opportunity to comment on any documents prepared under the National Environmental Policy Act (NEPA), 42 U.S.C § 4332(2)(C). Finally, we request participation in any stakeholder meetings that the AFRH may convene as part of the master planning process.

The National Trust wishes to participate in the Section 106 review process because the future of the President Lincoln and Soldiers' Home National Monument is inextricably intertwined with that of the AFRH. While the National Monument includes only the Lincoln Cottage (President Lincoln's summer retreat) and the surrounding 2.3 acres, the entirety of the AFRH campus is integral to the Monument's historic context and interpretation. The National Trust applauds the commitment by AFRH to promote and support the National Monument in the midst of its campus, and to protect the integrity of the campus's larger historic core. In addition, the National Trust recognizes the critical need to rebuild the AFRH Trust Fund, thereby allowing the AFRH to perform its primary mission. Therefore, we support the efforts of AFRH to meet its fiscal and planning goals via the properly managed new uses of AFRH properties. At the same time, the National Trust urges the AFRH to proceed with great sensitivity when changing the nature of the historical treasure represented by the entire campus. A master plan that balances the needs of the AFRH with the property's natural beauty and unique historic value has the best chance for success.

In addition, as the AFRH proceeds in the master planning process, the National Trust offers to lend technical advice on matters of historic preservation, as Trust staff time permits.



Recipient of the National Humanities Medal

The National Trust has extensive experience with historic preservation standards, laws, and compliance, as well as a long history of participating in master planning processes. As a consulting party, we wish to be an asset to the master plan development.

Please send any notices of meetings and documents for review and comment to both of the following individuals:

Thompson M. Mayes
Deputy General Counsel
National Trust for Historic Preservation
1785 Massachusetts Ave. NW
Washington, DC 20036

Sophia Lynn
Project Manager, President Lincoln and Soldiers' Home National Monument
AFRH-1315
3700 N. Capitol Street, NW
Washington, DC 20011-8400

Anticipating that the campus will undergo many profound changes in the next five to ten years, the National Trust wishes to work closely with the AFRH on all issues regarding the President Lincoln and Soldiers' Home National Monument and historic preservation for the overall site. The National Trust is privileged to enjoy such a productive collaboration with the Armed Forces Retirement Home. Thank you for your consideration.

Sincerely,

Thompson M. Mayes

Thompson M. Mayes
Deputy General Counsel

cc: Timothy Cox
Richard Moe
Lisa Burcham, SHPO

NCPC
NATIONAL CAPITAL PLANNING COMMISSION

401 9th Street, NW
North Lobby, Suite 500
Washington, DC 20576
Tel 202 482-7200
Fax 202 482-7272
www.ncpc.gov

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United States Senate
The Honorable Susan M. Collins

Chairman
Committee on Government Reform
U.S. House of Representatives
The Honorable Tom Davis

Mayor
District of Columbia
The Honorable Anthony A. Williams

Chairman
Council of the District of Columbia
The Honorable Linda W. Cropp

Executive Director
Patricia E. Gallagher, AICP

IN REPLY REFER TO:
NCPC File No. 1200/MP60
SEP 17 2004

Mr. Craig Wallwork
Armed Forces Retirement Home
3700 North Capitol Street, Box 1303
Washington, D.C. 20011-8400

Dear Mr. Wallwork:

Thank you for the opportunity to participate in the scoping of the Environmental Impact Statement (EIS) for a proposed Master Plan for the Armed Forces Retirement Home campus located at 3700 North Capitol Street, NW, in Washington, DC. The EIS is being prepared, as a federal regulation requirement, on the whole of the 276-acre facility including its 93 structures and its historic district. These scoping comments are limited to the Commission's role as the central planning agency for the federal government in the National Capital Region and express our general views on planning and environmental issues. However, it is important to note that the Commission is taking this opportunity to highlight to the Armed Forces Retirement Home management that within the District all federal planning and actions affecting federal interest must be reviewed by the National Capital Planning Commission.

With the above as background, the Commission staff's comment for scoping the federal EIS document notes the following issues concerning the proposed master plan evaluation.

I want to emphasize that the Armed Forces Retirement Home is located adjacent to the North Capitol Street corridor and is an import viewshed landmark and gateway to the Nation's Capital. The facility is a prominent element to the future planning of the surrounding cityscape. Improving the potential land use activity and transportation infrastructure along this important gateway into the city is a policy goal of the Commission's Comprehensive Plan. The Master Plan effort should create a desirable facility environment and location that attracts uses compatible to the existing surrounding residential neighborhoods and which should add to the economic vitality of the District of Columbia. To foster this kind of cooperation and coordination, the Commission has adopted project submission guidelines that provide for public participation in NCPC's planning and plan review activities. These guidelines promote intergovernmental cooperation and public participation in the planning of federal workplaces within

the region. They require federal agencies to coordinate their plans and projects with local, regional, and non-federal plans and programs for the development of the District. The proposed Master Plan should be anticipated to be achieved adhering to both the Comprehensive Plan goals and the project submission requirements of the Commission.

Additionally, NCPC staff stresses the substantial removal of vegetation in any proposed Master Plan would not be supported by the Comprehensive Plan objectives of the recently drafted new policies of the Commission. We strongly request that assessment of land area be directed toward limited impervious pavement areas and that the most compatible form of access design of all roads, parking, pedestrian surfaces, and building pattern development be determined in association with the Commission.

I also underscore that if any lands are considered for excessing from the campus by your planning efforts; the disposition of the excess federal property should ensure its future use is coordinated with surrounding development patterns and land uses, and that its planning contributes effectively to existing community development goals. Use by, or shared use between, new federal activities and no-federal public activities should be explored before the property is determined to be excess. This would include, as a reminder to the Armed Forces Retirement Home management, the potential of a Foreign Missions function as discussed by your personnel and the U.S. Department of State in the Spring of 2004 as based on the analysis provided by NCPC in the study *Foreign Missions in the District of Columbia*, prepared in 2003.

NCPC staff also emphasizes that NCPC is committed to supporting historic preservation through its policies, review process, and special studies as noted in its federal project and master plan review process. The Commission's goals in its planning documents *Extending the Legacy*, and the *Museums and Memorials Master Plan,* all describe aspects regarding the Armed Forces Retirement Home that are to be accomplished and provides a framework for historic preservation planning issues. A federal agency's master plan is a primary tool for assessing historic resources, developing long term goals and plans, coordinating with other public and private entities, and implementing new planning methods and technologies. NCPC anticipates your master planning effort will verify participation, in consultation with local preservation offices, and provide an opportunity for public involvement. Furthermore, this effort should anticipate preparation of management plans to provide in-depth procedures for the treatment of historic resources within the existing recorded historic district of the Armed Forces Retirement Home.

We appreciate your consideration of our comments at this stage of the project planning. The Commission staff requests, at this point, in conformance to the Commission's requirements regarding potential project reviews under its Environmental and Historic Preservation Policies and Procedures, that the National Capital Planning Commission be identified in the proposed EIS as a federal cooperating agency, in conformance with the guidance issued by the President's Council on Environmental Quality. Additionally, the staff reminds your consultants and planning staff that a federal or District of Columbia agency, before preparing construction plans the agency originates, shall advise and consult with the Commission as the agency prepares plans and programs in preliminary and successive stages. Please place the Commission on the distribution list pertaining to all further project planning. If you have technical questions concerning the information related in this letter, you may contact Mr. Eugene Keller, in the Office of Urban Design and Plans Review, at (202) 482-7251.

Sincerely,

Patricia E. Gallagher, AICP
Executive Director

Appendix B

Armed Forces Retirement Home – Washington

Master Plan

Air Quality Assessment

The air quality analysis for the AFRH was performed in accordance with guidelines set forth by 23 CFR Part 771, 49 CFR Part 622, the Clean Air Act, and the National Environmental Policy Act (NEPA), as they appropriately apply. The analysis addresses both mobile and stationary sources of air pollutant emissions anticipated to change as a result of development of the Master Plan Alternatives.

1.1.1 Mobile Source Analysis

The analysis of mobile sources for the AFRH-W focuses on CO because it is localized and directly relates to traffic volumes and patterns which will be affected by future site development. This analysis was prepared in accordance with guidance set forth by the U.S. Environmental Protection Agency (EPA) *A Modeling Methodology for Predicting Pollutant Concentrations near Roadway Intersections* (EPA 1995).

To determine if the alternatives would violate NAAQS, a worst-case scenario was identified by reviewing the design year traffic volumes and levels of congestion associated with each of the major intersections in the study area. Because the North Capitol Street NW and Harewood/Fort Street NW intersection was identified as the intersection/interchange with the highest traffic volume and level of service under all of the alternatives, it qualified as the worst-case scenario for the air quality analysis. The steps taken to perform this analysis include the following:

- Identify air quality receptor locations based on project maps that would represent locations near the North Capital Street, NW and Harewood/Fort Street, NW intersection where exposure to CO was most likely to occur;
- Determine the background CO concentrations from the CO measurements for the air quality receptor locations identified;
- Obtain the basic regional emission rates generated by Mobile6 from the Washington Metropolitan Council of Governments (EPA, 2001);
- Using CAL3QHC, calculate final CO concentrations for each receptor location for each development alternative;
- Compare final CO concentrations to the 1-hour and 8-hour NAAQS for CO to determine if any violations would occur.

1.1.2 Background CO Levels

Background CO concentrations were obtained from the District of Columbia Department of Health for the District of Columbia's monitoring station at the Verizon Telephone Building on 21st Street, NW. That monitoring site was chosen for this analysis because it was the closest monitoring station to the AFRH-W. The background CO monitoring levels used from this site were measured in 2003. The maximum 1-hour and 8-hour CO concentrations for 2003 were used as the background concentrations for 2016 and 2030 because it is assumed emission control programs will likely curtail any increases in background concentrations. Table 1 presents the background CO concentrations used for this study.

Table 1. Background Co Concentrations

Year	1-Hour Concentration (ppm)	8-Hour Concentration (ppm)
2016	10.9	3.7
2030	10.9	3.7

Traffic Data

The traffic data used for this air quality analysis included average daily traffic volumes (ADTs), peak-hour volumes, and percent daily distributions, represented as diurnal traffic curves, for both the Master Plan Alternatives and the No Action Alternative. The diurnal curve was developed using data obtained from a 24-hour traffic monitoring station located on New Hampshire Avenue, just north of the District of Columbia, as this is the 24-hour traffic monitoring station for a major arterial road located closest to the AFRH-W. The diurnal curve, shown as daily distribution percentages is presented in Table 2. The peak hour traffic volumes by alternative are presented in Table 3. North Capitol Street, NW and Harewood/Fort Street, NW intersection traffic data used was used in the analysis.

Table 2. Diurnal Traffic Curve

Hour	% of ADT	Ratio of Hour to Peak Hour
12m - 1am	1.1%	0.171
1am-2am	0.5%	0.076
2am-3am	0.3%	0.055
3am-4am	0.3%	0.050
4am-5am	0.6%	0.098
5am-6am	2.0%	0.323
6am-7am	4.3%	0.687
7am-8am	**6.3%**	**1.000**
8am-9am	6.2%	0.987
9am-10am	5.2%	0.827
10am-11am	4.9%	0.768
11am-12n	4.9%	0.778
12n-1pm	5.5%	0.735
1pm-2pm	5.7%	0.757
2pm-3pm	5.9%	0.793
3pm-4pm	6.3%	0.837
4pm-5pm	6.7%	0.895
5pm-6pm	**7.5%**	**1.000**
6pm-7pm	6.6%	0.884
7pm-8pm	5.5%	0.740
8pm-9pm	4.5%	0.602
9pm-10pm	3.9%	0.517
10pm-11pm	3.0%	0.400
11pm-12m	2.0%	0.262

Table 3. Peak Hour Traffic Volumes

Traffic Segment	No Action		Alternative 2		Alternative 3		Alternative 4	
	AM	PM	AM	PM	AM	PM	AM	PM
Harewood westbound	730	630	740	660	746	666	772	717
Harewood eastbound	478	697	483	703	486	706	507	716
North Capitol southbound departure	431	950	2525	2013	1326	2352	827	1241
North Capitol northbound approach	1,376	2,357	2,125	3,728	1,649	3,226	1,716	2,923
North Capitol northbound departure before the ramp from Fort Drive	1,115	2,120	1,746	3,281	1,339	2,851	1,378	2,583
North Capitol northbound departure after the ramp from Fort Drive	1,197	2,283	1,828	3,444	1,421	3,014	1,460	2,746
North Capitol southbound approach	200	822	1,982	1,727	962	2,177	537	1,069
Fort Drive westbound after the ramp to North Capitol	745	557	1,067	745	895	640	847	688
Fort Drive Westbound before the ramp to North Capitol	827	720	1,149	908	997	803	929	851
Fort Drive eastbound	523	733	646	949	581	880	630	855
Fort Drive westbound ramp to North Capitol northbound	82	163	82	163	82	163	82	163

1.1.3 Emission Factors

The emission rates associated with individual vehicles are influenced by factors such as ambient air temperature, engine temperature, operation mode, average speed, and maintenance. The average emission rate for a fleet of vehicles operating on a highway is further influenced by the composition of the fleet, vehicle type, and vehicle age. The fleet emission rate reflects changes in vehicle, engine, and emission control system technologies; changes in applicable regulations and emission standards; and realistic driving patterns. Mobile source emission factors were provided by the Metropolitan Washington Council of Governments (MWCOG) and represent output from the latest version of the EPA Mobile Source Emission Factors Model, MOBILE6, released in October, 2002 for the year 2016. For this analysis, winter months were evaluated because vehicle CO emission rates increase with decreasing ambient temperature.

CO emissions factors generated by MOBILE6 are shown in Table 4. Running emissions factors are influenced by speed, and roadway speeds were based on field measurement. The average speed on Harewood Street and Fort Drive was determined to be 25 miles per hour (mph), and the speed on North Capitol Street was 35 mpH. The emission factor for vehicles traveling 1 mph was used as the idling emissions factor.

Table 4. CO Emission Factors

ROADWAY LINK	Idling	Running
Harewood westbound	15.055	3.569
Harewood eastbound	15.055	3.569
North Capitol southbound departure	15.055	3.473
North Capitol northbound approach	15.055	3.473
North Capitol northbound departure before the ramp from Fort Drive	15.055	3.473
North Capitol northbound departure after the ramp from Fort Drive	15.055	3.473
North Capitol southbound approach	15.055	3.473
Fort Drive westbound after the ramp to North Capitol	15.055	3.569

ROADWAY(S)	YEAR 2000 (g/veh-mile or g/hr)	
	Idling	Running
Fort Drive Westbound before the ramp to North Capitol	15.055	3.569
Fort Drive eastbound	15.055	3.569
Fort Drive westbound ramp to North Capitol northbound	15.055	3.569
Note[1]: Units are grams per vehicle-mile (g/veh-mile) for running vehicles and grams per hour (g/hr) for idling vehicles.		

CAL3QHC Analysis

The mathematical model used to estimate future CO concentrations is the current version of the EPA's CAL3QHC dispersion model, released in June 1993. The CAL3QHC dispersion model is a microcomputer-based modeling methodology developed to predict the level of CO or other inert pollutant concentrations for motor vehicles traveling near roadway intersections.

The CAL3QHC program requires that roadways be modeled as segments known as links. Links can be either free-flow links (for vehicles moving at a constant velocity) or queue links (for idling vehicles). Each can be one of four types of links based on the roadway geometry (at-grade, fill, bridge, or depressed). The required inputs for free-flow links are the endpoints, traffic volume, the emission factor, source height, and mixing zone width. A queue link is defined as a straight segment of roadway with a constant width and emission source strength, where vehicles are idling for a specified period of time. Required inputs for queue links are the endpoints, approach traffic volume, emission factor, average cycle length, average red time length, number of travel lanes, clearance lost time, source height, signal type (pre-timed actuated, or semi-actuated), and arrival rate.

CAL3QHC also requires the input of meteorological factors. These factors are average timing, surface roughness coefficient, settling velocity, deposition velocity, wind speed, mixing height, stability class, and wind angle range. The values used for these factors are summarized in Table 5.

The maximum 1-hour CO concentrations are modeled using the highest 1-hour traffic volumes. To estimate the maximum 8-hour average CO concentration, daily traffic

distributions (diurnal curve), peak-hour traffic volumes, and DHVs were used to separate the ADTs into hourly traffic volumes. Hourly time segments were analyzed to determine the receptor-specific CO concentrations. The highest eight consecutive hourly concentrations were averaged to obtain the 8-hour average CO concentration.

Table 5. CAL3QHC Input Assumptions

Input Variable	Assumption and/or Value
Averaging Time	60 minutes
Surface Roughness	175 cm
Settling Velocity	0 cm/s
Deposition Velocity	0 cm/s
Source Height	0 m (at grade)
Signal Type	1 for Pretimed
Average Signal Length	100
Average Red Time Length	46
Clearance Lost Time	4 s – default value
Arrival Rate	3 (average progression) – default value
Wind Speed	1.0 m/s
Wind Direction	0°
Atmospheric Stability Class	D(4)
Mixing Height	1,000 m
Multiple Wind Directions	Y
Wind Direction Increment Angle	10°
First Increment Multiplier	0
Last Incremental Multiplier	36

ANALYSIS RESULTS

Twelve air quality receptor locations were selected to represent sensitive air quality locations within the study area. Each receptor is located near sidewalks adjacent to the North Capitol Street, NW and Harewood Street, NW intersection. Traffic associated with each of the proposed development alternatives at the North Capitol Street, NW and Harewood Street, NW intersection was analyzed. Both the 1-hour and 8-hour CO levels were predicted and the results were compared to the National Ambient Air Quality

Standard (NAAQS) for CO. Table 6 presents the results of the 1-hour analysis using projected AM and PM hourly peak traffic volumes for the build year. For the 1-hour analysis, the AM and PM maximum CO concentrations among all alternatives were identified. For the projected hourly peak-traffic volume, results indicated the range of CO concentrations in the AM hour would be 11.0 to 11.6 ppm. The range of CO concentrations for the PM hour would be 11.2 to 11.7 ppm. None of the maximum CO concentrations for the peak AM and PM hours would exceed the NAAQS of 35 ppm.

Table 7 presents the results of the 8-hour analysis. Using the projected peak hour traffic volume and a general traffic volume hourly distribution, traffic volumes for the peak 8-hour traffic period were identified for input in the CAL3QHC model. The model results indicate for the peak 8-hour period, the range of the average CO concentrations for all alternates would be 3.9 to 4.4 ppm. The maximum concentration of 4.4 ppm would not exceed the 9 ppm NAAQS.

Table 6. Peak Hour Analysis Results for CO (ppm)

Receptor No.	Maximum Total								NAAQS	Violation
	AM				PM					
	No Action	Alt 2	Alt 3A	Alt 4	No Action	Alt 2	Alt 3A	Alt 4		
1	11.0	11.3	11.1	11.1	11.2	11.4	11.4	11.2	35	No
2	11.0	11.2	11.1	11.1	11.2	11.3	11.3	11.2	35	No
3	11.0	11.5	11.2	11.1	11.2	11.4	11.4	11.2	35	No
4	11.0	11.2	11.1	11.1	11.1	11.3	11.4	11.3	35	No
5	11.1	11.4	11.3	11.2	11.3	11.6	11.6	11.4	35	No
6	11.1	11.2	11.1	11.2	11.2	11.3	11.3	11.2	35	No
7	11.0	11.6	11.2	11.2	11.3	11.5	11.6	11.3	35	No
8	11.2	11.4	11.3	11.3	11.4	11.6	11.6	11.5	35	No
9	11.3	11.5	11.3	11.3	11.4	11.7	11.7	11.5	35	No
10	11.1	11.3	11.2	11.2	11.1	11.3	11.3	11.2	35	No
11	11.2	11.3	11.3	11.3	11.5	11.7	11.7	11.6	35	No
12	11.2	11.4	11.2	11.3	11.3	11.5	11.4	11.3	35	No

Note: 1-hour maximum CO concentrations include a background concentration of 10.9-ppm.

Table 7. 8-hour Analysis Results for CO (ppm)

Receptor	No Action	Alternative 2	Alternative 3A	Alternative 4	SJVAPCD Standard	Violation
1	4.0	4.0	4.1	4.0	9	No
2	3.9	4.0	4.0	4.0	9	No
3	4.0	4.2	4.1	4.0	9	No
4	3.9	4.0	4.0	3.9	9	No
5	4.0	4.2	4.2	4.1	9	No
6	4.0	4.1	4.1	4.0	9	No
7	4.1	4.2	4.3	4.1	9	No
8	4.1	4.3	4.3	4.2	9	No
9	4.1	4.4	4.4	4.2	9	No
10	3.9	4.0	4.0	3.9	9	No
11	4.1	4.4	4.3	4.3	9	No
12	4.1	4.2	4.2	4.1	9	No

1.1.4 Stationary Source Analysis

Additional site development at the AFRH-W site would increase energy demands and air pollutants emitted by on-site facilities required to accommodate this demand. According to *The Master Plan, Steam System Evaluation* (February 2005), approximately 50 percent of the existing system capacity is available to accommodate the increased demand, however, it would be insufficient to serve the needs of all of the development proposed under the Master Plan Alternatives. Therefore modifications to the system, primarily increased boiler capacity, would be required.

An analysis was conducted to determine whether:

- additional boiler capacity would require a major source air quality permit to construct under the New Source Review process, and
- the project would be required to undergo a formal review under the General Conformity Rule.

1.1.4.1 New Source Review (NSR)

Under provisions of the Clean Air Act, new major stationary sources of air pollution and major modifications to major stationary sources must have an air pollution construction permit. The process for obtaining the permit is called New Source Review (NSR). Under the NSR process, permits for sources located in attainment areas are referred to as Prevention Of Significant Air Quality Deterioration (PSD) permits; while permits for sources located in non-attainment areas are referred to as Non-Attainment Area (NAA) permits. As the Washington DC area does not meet NAAQS for ozone, depending on its intensity, implementation of the Master Plan would require review of a NAA permit since the new development would emit oxides of nitrogen (NO_x) and volatile organic compounds (VOCs).

Analysis of Permitting Requirements for Additional Boiler Capacity

To determine whether uncontrolled potential-to-emit (PTE) emissions under each of the Master Plan Alternatives would require a major source construction permit, the following steps were undertaken:

- estimating existing and future facility-wide energy demands,
- estimating annual PTE emissions for each alternative using EPA AP-42 pollutant emissions factors for natural gas fired boilers, and
- comparing annual estimated PTE emissions to NSR significant net emission increase permitting thresholds.

Table 8 presents the estimated energy demand for each alternative based upon proposed uses.

Table 8. Summary of Facility-wide Energy Requirements

Alternative 2	7,520,000	1,225,000	1,455,000	10,200,000	367.2	2,765.4
Alternative 3A	4,230,000	1,825,000	1,455,000	7,051,000	270.4	3,146.5
Alternative 3B	4,135,000	1,945,000	1,455,000	7,535,000	271.3	3,178.2
Alternative 4	1,945,000	5,000,000	1,455,000	7,845,000	282.4	3,992.0

Assumptions:

1. Commercial GSF was assumed to include Institutional, Research and Development, Retail, Medical, and

Office.
2. Residential GSF was assumed to include Residential, Hotel, and Embassies.
3. The 60,000 lbs/hr of steam (30,000 lbs/hr as redundancy) discussed in the Steam System Evaluation is capable of supporting 1,455,000 square feet. Thus the boiler potentials are calculated off of this amount. Conservatively, the existing facility was assumed to be 100% residential.
4. These values are calculated from a heating value of 36 BTU/GSF-hr.
5. Commercial GSF was assumed to require maximum boiler usage for 12 hours/day and half of the year (2,190 hours). Residential GSF was assumed to require maximum boiler usage for 24 hours/day and half of the year (4,380 hours). The annual hours reflect the relative proportion of residential to commercial space.

Calculation Methodology

Emissions estimates were calculated based on U.S. EPA provided AP-42 emission factors for natural gas burning in a boiler. The hourly emission estimate was multiplied by the Annual Hours from Table 8 to determine the annual PTE emissions. Calculation methodology used for Alternative 4 is presented below.

AP-42 emission factor	=	190 lb of $NO_x/10^6$ ft^3
Gas Heating Rate	=	1,020 BTU/ft^3
Hourly Gas Volume	=	282.4 MMBTU/hr / 1,020 BTU/ft^3
	=	276,882.4 ft^3/hr
Emission Rate	=	190 lb of $NO_x/10^6$ ft^3 x 276,882.4 ft^3/hr
	=	52.6 lb of NO_x/hr
Hours of Operation	=	2,190 hrs/year x (1,390,000 gsf commercial / 7,845,000 gsf total) + 4,380 hrs/year x (6,455,000 gsf residential / 7,845,000 gsf total)
	=	3,992.0 hrs/year
Annual Emission Rate	=	3,992.0 hrs/year x 52.6 lb of NO_x/hr
	=	105.0 tons/year

The annual PTE emissions for applicable criteria air pollutants (tons/year) are presented in Table 9.

Table 9. Annual PTE Emissions for Applicable Criteria Pollutants (tons/yr)

Alternatives	SO_2	NO_x	CO	PM$_{10}$	VOC
Alternative 2	0.3	94.6	41.8	3.8	2.7
Alternative 3A	0.3	79.2	35.0	3.2	2.3
Alternative 3B	0.3	80.3	35.5	3.2	2.3
Alternative 4	0.3	105.0	46.4	4.2	3.0
New Source Review Major Source Threshold	100	100	100	100	100

Only Alternative 4 would exceed the NSR threshold for NO_x and would therefore be classified as a NSR major source. Development under Alternative 4 may require a NAA permit. If additional restrictions on hours of operation per year are imposed on Alternative 4, or if NO_x control technology is incorporated into the engineering design for the new boiler, Alternative 4's PTE NO_x emissions could also fall below the 100 ton per year NSR major source threshold.

1.1.4.2 Federal Air Conformity Analysis

In addition, in non-attainment areas such as Washington, DC, new stationary sources must be evaluated under the provisions of the General Conformity Rule to determine if its emissions would:

- Cause or contribute to new violations;
- Increase the frequency or severity of existing violations; or
- Delay timely attainment or interim emission reductions.[1]

An analysis to determine whether construction of any of the Master Plan Alternatives would require a formal conformity analysis under the General Conformity Rule was also performed. Pursuant to the General Conformity Rule, all reasonably foreseeable emissions associated with energy requirements for the proposed boiler in the four Master Plan alternatives were quantified and compared to the applicable annual *de minimus*

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[1] Air Force Center for Environmental Excellence General Conformity Rule Fact Sheet, 2000.

levels to determine potential air quality impacts. As Washington, DC is non-attainment for ozone, *de minimus* levels of 25 tons per year have been established for NO_x and VOC.

Methodology

For purposes of conducting the General Conformity Rule analysis, the alternatives were evaluated for the additional new boiler capacity that would be required to support the proposed facilities. This analysis only takes into consideration the increase in boiler capacity.

Data for the proposed additional new boiler capacity was derived from the *Steam System Evaluation* (February 2005.) Estimates for BTU requirements for additional capacity required by the four Alternatives are presented in Table 10.

Table 10. Summary of Additional Energy Requirements

Alternative	Commercial gsf	Residential gsf	Total gsf	MMBTU/hr	Annual Hours
Alternative 2	7,520,000	1,225,000	8,745,000	314.8	2,496.8
Alternative 3A	4,230,000	1,825,000	6,055,000	218.0	2,850.1
Alternative 3B	4,135,000	1,945,000	6,080,000	218.9	2,890.6
Alternative 4	1,945,000	5,000,000	6,390,000	230.0	3,903.6

Assumptions:

1. Commercial GSF was assumed to include Institutional, Research and Development, Retail, Medical, and Office.
2. Residential GSF was assumed to include Residential, Hotel, and Embassies.
3. These values are calculated from a heating value of 36 BTU/GSF-hr.
4. Commercial GSF was assumed to require maximum boiler usage for 12 hours/day and half of the year (2,190 hours). Residential GSF was assumed to require maximum boiler usage for 24 hours/day and half of the year (4,380 hours). The annual hours reflect the relative proportion of residential to commercial space.

From the Steam System Evaluation Report (February 2005), it was determined that there would be an estimated 58.2 MMBTU/hr excess capacity from the existing boilers that would be available for future expansion. The total new boiler capacity for each Alternative is shown in Table 11 below. These numbers were derived by subtracting the 58.2 MMBTU/hr excess boiler capacity from those listed in Table 10.

Table 11. Total New Energy Capacity Required

Alternatives	New Capacity (MMBTU/hr)
Alternative 2	256.6
Alternative 3A	159.8
Alternative 3B	160.7
Alternative 4	171.8

Emission estimates were calculated based on U.S. EPA provided AP-42 emission factors for natural gas burning in a boiler. The hourly emission estimate was multiplied by the Annual Hours from Table 8 to determine the annual emissions. The annual PTE emissions for applicable criteria pollutants (tons/year) are presented in Table 12.

Table 4-12. Annual PTE Emissions for Applicable Criteria Pollutants (tons/yr) for Additional Boiler Capacity

Alternatives	NO_x	VOC
Alternative 2	59.7	1.7
Alternative 3A	42.4	1.2
Alternative 3B	43.3	1.3
Alternative 4	62.5	1.8
NSR Significance Level	25	25

Findings

The NSR significant net emission increase level for NO_x and VOC applicable to a severe ozone non-attainment area is 25 tons per year. The annual PTE NO_x emissions estimated for all four Master Plan alternatives indicate that emissions would exceed the annual de minimus NO_x threshold of 25 tons per year. In accordance with the General Conformity Rule, if the direct and indirect emissions of a criteria pollutant (or its precursors) are

above the de minimus level, a formal general conformity determination would be required for that pollutant.

Additionally, the annual PTE VOC emissions estimated for all four Master Plan alternatives indicate that emissions would not exceed the annual de minimus VOC threshold of 25 tons per year. Therefore, the Federal action which is contemplated is expected to have a minimal VOC air quality impact and no further analysis would be required.

Air Quality Mitigation

The effects of increased NO_x emissions can be mitigated as follows:

Option 1: Incorporation of NO_x Emission Reduction into the Initial Engineering Design

By implementing Option 1, NO_x emissions controls can be incorporated into the initial engineering design in order to reduce annual PTE NO_x emissions to below the 25 ton per year de minimus threshold. By implementing this option, no formal general conformity determination would be required to be performed. Additionally, Alternative 4, including the total boiler capacity would have annual PTE NO_x emissions reduced to be below 100 tons per year. As a result, Alternative 4 would no longer require that a major source NSR construction permit be obtained.

Potential NO_x emission control options include:

- Take limits on permitted hours of operation per year
- Incorporate NO_x control technology

NO_x control technology options for boilers include low NO_x burners, selective catalytic reduction (SCR) and selective non-catalytic reduction (SNCR) control technologies. Maximum control efficiencies expected from each technology are as follows:

- 80 percent for low NO_x burners
- 94 percent for SCR and
- 70 percent for SNCR

With the incorporation of any of these NO_x control technologies, annual NO_x PTE emissions for all four alternatives would be reduced to a level that is below the

established 25 ton per year de minimus threshold and no major source NSR construction permit would be required.

Option 2: *Perform a General Conformity Determination for NO_x for all four alternatives and also obtain a Major Source NSR Permit for Alternative 4 Only*

If Option 1 is not chosen, annual NO_x PTE emissions would be above the 25 ton per year de minimus threshold so that a formal conformity determination is required for all four alternatives. The same NO_x controls measures as outlined in Option 1 above would need to be assessed. However, Alternative 4 annual PTE NO_x emissions show that it is also classified as a "major source" (i.e., annual PTE emission greater than 100 tons per year) under the NSR regulations. Therefore, Alternative 4 would be required to obtain an NSR major source construction permit and the NSR regulations would impose Lowest Achievable Emission Rate (LAER) control requirements for NO_x which is SCR control technology. LAER requirements do not have to consider economic feasibility, only technical feasibility of all possible NO_x control options.

Appendix C

UNITED STATES OF AMERICA

ARMED FORCES RETIREMENT HOME (AFRH)

PUBLIC HEARING ON CAMPUS MASTER PLAN

ENVIRONMENTAL IMPACT STATEMENT

Washington, D.C.

Wednesday, June 22, 2005

SPEAKERS:

TIMOTHY COX
AFRH Chief Operating Officer

JOAN GLYNN
Greenhorne & O'Mara, Inc.

CRAIG WALLWORK
General Services Administration

ALSO SPEAKING:

SHERILYN ADAMS

AVIS ANDERSON

JACQUELINE ARENDSE

GEORGE BAILEY

CATHY BOYLAN

JIM CALDAS

JAMES CARSTENSEN

BILL CRANDALL

TIM DENNEE

DAVID DOUGLAS

MARK EWERT

MICHAEL GEORGE

LAURI HAFFENSTEIN

JOHN HANLY

SANDRA HOFFMAN

DEAN KHAN

ALSO SPEAKING (CONT'D):

JANET LUGO

LEWIS MAIDEN

TED MARIANI

TOM MAYAS

ROBERT O'BRIEN

LINDA PERKINS

THOMAS ROONEY

SHERI STEPHANSON

ARLUS STEPHENS

LISA SWANSON

JEFF TAGGART

CLIFF VALENTI

ALEXEY VOLYNETS

JANICE WILLIAMS

JOHN ZOLTNER

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P R O C E E D I N G S

(7:11 p.m.)

MR. COX: If people in the back want to take seats there is plenty of seats on the sides, plenty of seats in the front, so please come down.

Good evening and welcome to the Armed Forces Retirement Home public hearing on the environmental impact statement for the Armed Forces Retirement Home Campus Master Plan. I'm Tim Cox, the Chief Operating Officer for the Armed Forces Retirement Home. With me presenting tonight are Craig Wallwork with General Services Administration, Craig, and Joan Glynn, a consultant from Greenborne & O'Mara.

Before I begin the official part of our program I just want to say personally that I'm really pleased to see all of you here. You will learn more about AFRH, Armed Forces Retirement Home, and why we're here, why we are looking at this development, and this is just a start of our collaborative process with all of you and I hope many more too because we want to do what's best not just for us and the residents, which is most important to me, but we also want to be the best neighbor that we can be to all of you and that's very important to us too.

We're first and foremost a retirement home. You'll find out in my presentation how long we have been here, what we do, but we also want to be able to continue to be a neighbor like we have for the past 150 years. This process tonight is a formal hearing so you'll give your presentation and we'll go through what goes on tonight. But I do want you to know that my team, the team you meet here, are here to make this a collaborative process and do the best we can for all of us involved so we really appreciate your interest, your patience

tonight in waiting a little longer for everyone to come in, and then your contributions that you will give us tonight. I really appreciate that.

AFRH is an independent establishment of the executive branch of the federal government which provides residences, nursing home, and related services to former military enlisted personnel at two locations, Washington, DC, this site, and Gulfport, Mississippi, is our sister home. AFRH in Washington, DC, was established in 1851 as the Old Soldiers Home and it currently serves nearly 1,000 military veterans.

The campus features private rooms, bank, chapels, convenience store, post office, laundry, barbershop and beauty salon, dining room, golf course, fishing ponds, 24- hour security, and staff presence. The 272- acre site is currently developed with over 100 structures including the United States Soldiers' and Airmen's Home National Landmark District.

AFRH is currently in the process of preparing a master plan to guide future use of the AFRH Washington campus. In carrying out our social and environmental responsibilities AFRH is committed to ensuring that proper consideration is given to the environment when undertaking such a major project. As part of that consideration this meeting is an important opportunity for you both as a vested community member and an individual citizen to provide your comments on the draft EIS. We appreciate you making time in your evening to participate with us.

The following presentation will explain the purpose and the need for the proposed master plan and the findings of our draft EIS. During the presentation you will also be given an update on the Section 106 consultation process for historic preservation. Following this presentation you will have the opportunity to provide comments on the draft EIS and Section 106 process.

All comments received either through oral comments tonight or through [illegible]

final EIS. After the 30-day public review period of that final EIS AFRH will

implementation.

AFRH will not be answering questions or addressing comments during this meeting. The written comment period ends July 2005. Comments on the Section 106 process will be accepted through the Section 106 consultation. If you have not already done so you may sign up to speak at the welcome table in the back of the room. Please note tonight's meeting will be recorded so that we have a complete record of all the comments given.

Before we begin I'd like to go over tonight's agenda. We will be talking about the NEPA process, Section 106 process, purpose and need for our action, objectives, master plan alternatives, impacts, next steps, and public comments. The public hearing is being conducted in accordance with the National Environmental Policy Act, commonly referred to as NEPA.

NEPA provides for the consideration of environmental issues in federal agency planning and decision-making. NEPA states federal agencies including AFRH must prepare an EIS for actions that may have significant environmental impacts and consider a reasonable range of alternatives, use a systematic interdisciplinary approach in analyzing environmental impacts, and factor environmental considerations into decisions.

AFRH will use findings in the EIS as we prepare development guidelines for the site. Throughout the development process AFRH will continue to look for ways to avoid, minimize, and mitigate impacts on the human and natural environment. This chart outlines the NEPA process. To date we have published the notice of intent August 18, 2004, held a public scoping meeting September 9, 2004, published a draft EIS May 20, 2005, and tonight we are holding our public hearing. We anticipate the final EIS will be distributed for a 30-day public review period in late August 2005 and the record of decision will be final in September 2005.

Section 106 of the National Historic Preservation Act of 1966 requires that federal agencies including AFRH take into account their effects of their actions on any district, site, building, structure, or object listed in or eligible for inclusion in the National Register of Historical Places. Section 106 review ensures that preservation values are factored into federal agency planning and decisions. AFRH is in consultation with Section 106 with the DC State Historic Preservation Office and the Advisory Council on Historic Preservation.

Section 106 requires that AFRH provide the public, agencies, and other interested parties the opportunity to comment on the AFRH actions impacting historic properties. AFRH is combining the public environment processes for Section 106 and NEPA in line with Section 106 regulations. Though comments on the draft EIS are due by 6 July comments on the Section 106 process will be accepted throughout our consultation process with the DC State Historic Preservation Office and the Advisory Council on Historic Preservation.

Since the home's beginning operational funding has come from active military personnel. A permanent trust fund was established nearly 150 years ago and is renewed monthly by active duty payroll deductions. Fines and forfeitures from the armed services and the monthly withholding have provided the principal support for the home throughout its history.

In recent years the principal of the trust fund has been shrinking. Congress through the National Defense Authorization Act for Fiscal Year 2002 gave the AFRH with approval of the Secretary of Defense authority to sell, lease, or otherwise dispose of property that is excess to the needs of AFRH. Proceeds from such transactions will enable the AFRH trust fund to be replenished. These additional revenues are needed to support a sustainable retirement home for our retired military personnel.

To implement this authority and plan for its own facilities, AFRH is currently preparing a master plan for the DC campus that will guide the long-

term use and development of the site by AFRH and others. The objectives of the AFRH master plan alternatives are to preserve and improve the essential components of the AFRH for the residents and the community, to provide sufficient revenue to support the AFRH's goal of resident-focused care while replenishing the depleted trust fund, to grow the trust fund to not only meet the needs of today's residents but also the need for future generations of heroes as well, to attract development at fair market value that is compatible with the mission of the AFRH, and to ensure an open participatory process with the AFRH residents and the community at large.

I will now hand the presentation over to Craig Wallwork from General Services Administration, which is advising AFRH on the redevelopment process. Craig will be talking to you about the master plan alternatives which have been developed and studied in the draft EIS. Craig.

MR. WALLWORK: Thank you. Good evening. Several alternatives for the AFRH master plan are studied in the draft EIS. Potential development under each alternative was defined after taking into consideration compatibility with the AFRH mission, compatibility with historic resources and existing environmental conditions, compatibility with surrounding land uses, and analysis of real estate market conditions in the area.

Development zones as shown on the slide were defined to guide development of the master plan alternatives. It should be noted that private or governmental development on the AFRH site would occur primarily through leases or sales. The decision to lease or sell would be based on economic analysis and is not part of the EIS.

As required by NEPA, the EIS also studies the impacts of no-action alternatives. Under the no-action alternative or alternative 1 a master plan for AFRH would not be adopted and no new construction on the site would occur; therefore, there would be no additional revenue from development on the site so would not meet the financial needs of the Armed Forces Retirement Home.

Under alternative 2 approximately 8.7 million gross square feet of new development would occur on the AFRH campus. It has the greatest density of any of the alternatives. As with all the build alternatives it has a mix of uses but has more medical and educational space than the other alternatives.

Development in Zone 1 would consist of institutional uses compatible with the AFRH operations or AFRH facilities. Zone 2 would be developed with new residential units for AFRH use, lease, or sale. Zone 3 would be designated for educational use while Zones 4 and 5 would be developed with compatible medical uses and Zone 6 would contain residential development compatible with the residential developments west of Rock Creek Church Road. This zone would also potentially include small-scale retail development to serve the residential areas.

Under alternatives 3A and 3B approximately six million gross square feet of new development would occur on the AFRH. This alternative has a similar mix of uses as is found in alternative 2, is less dense, and has a greater emphasis on office and research and development space as compared to alternative 2. As with alternative 2 development in Zone 1 would consist of institutional uses and Zone 2 would be developed with new residential units for AFRH use, lease, or sale. Zone 3 would be designated for residential, office research, retail, and hotel uses and Zone 4 would be developed with compatible medical uses.

There are two developments under options for Zones 5 and 6 under alternative 3. Under alternative 3A Zone 5 would contain residential development while Zone 6 would contain residential and institutional uses. Under 3B Zones 5 and 6 would be developed for embassies in support of foreign missions and international organizations element of the comprehensive plan for the national capital developed by the National Capital Planning Commission.

Under alternative 4 approximately 6.4 million gross square feet of new development would occur on AFRH. This alternative places a greater emphasis

on residential uses than do alternatives 2 and 3. Again, as with other alternatives, development in Zone 1 would consist of institutional uses and Zone 2 would be developed with new residential uses for AFRH use, lease, or sale. Zones 3, 4 and 5 would be developed with residential, office, and retail users. Zone 6 would contain residential development compatible with residential development west of Rock Creek Church Road.

Joan Glynn, our environmental contractor, will now present the alternatives and findings of the draft EIS. Joan.

MS. GLYNN: Good evening. Each of the master plan alternatives studied in the EIS would result in impacts to the human environment. The alternatives would all disturb soils and topography on the site through site grading and excavation. Existing ponds would not be directly affected by the new development; however, concrete storm water channels may need to be realigned.

Development will increase impervious surface or hard, nonporous surfaces on the site by 34 to 37.5 acres which would increase storm water runoff. Best management practices for storm water management would be incorporated into the site design to mitigate for storm water impacts.

Under all of the master plan alternatives forested areas, mature trees, and meadow habitats could be replaced with developed areas but guidelines can be put in place to mitigate these potential impacts. Because the site is located in an urban area impacts to wildlife would be minimal.

The social impacts from the master plan alternatives would primarily be beneficial. The master plan alternatives would be for the most part consistent with the comprehensive plan for the national capital. The alternatives are consistent with the federal environment, parks and open space, and natural features components of the comprehensive plan.

Alternative 3B would support the foreign mission and international organizations component of the plan. All of the alternatives would impact historic features including the historic landscape. These impacts would be

mitigated through a programmatic agreement with the DC State Historic Preservation Office, the Advisory Council on Historic Preservation, and other parties. Because the AFRH is federally owned it is not subject to zoning by the District of Columbia.

The alternatives would result in beneficial increases in housing stock within the District of Columbia resulting in long- term increases in the city's population. The increase in population along with the increase in office and commercial space would result in increased demands for community services. There is adequate capacity in neighborhood schools to handle the increase in population and development under the master plan alternatives would result in increased cost for service from police, fire, and EMS services.

Implementation of the master plan alternatives would result in short-term beneficial gains from construction spending and construction employment. Long-term beneficial impacts would occur from new jobs for local residents from the plan development. The master plan alternatives could accommodate between 3,000 and 16,000 employees on the site.

Implementation of the master plan alternatives would have long-term beneficial impacts to city revenues through the increase in real property, personal property, franchise, sales and use, and individual income taxes. It is estimated that the alternatives could generate between $31 and $47 million in real property taxes.

In addition implementation of the master plan alternatives would provide revenues to replenish the AFRH trust fund. Impacts to low-income and minority populations were assessed in accordance with the Executive Order 12898. Adverse impacts from air quality, traffic, noise would occur and could be felt by area residents; however, these impacts are not anticipated to be disproportionately high for low-income or minority populations.

A phase 1A archeology survey was prepared for the site. The survey concluded that the AFRH has a moderate potential for prehistoric and historic

Archeological resources. A phase 1B archeology survey would be needed prior to any site construction to determine the presence or absence of archeological resources.

The master plan alternatives would not alter or destroy buildings associated with the President Lincoln and Soldiers home National Monument, the US Soldiers' and Airmen's Home National Historical Landmark, and national register listed historic district. New construction could alter the viewsheds (7) to and from these resources.

In addition new construction could adversely affect the historic landscape of the national register-eligible AFRH historic district. In addition the historic context of individual buildings or building groups could be altered. New construction on the AFRH could affect the views to and from the historic properties outside the site including the Harewood Gate Lodge and East Grounds, the Petworth and Park View neighborhoods, and the United States Soldier's and Airmen's Home National Cemetery.

AFRH has initiated consultation through the Section 106 process with the DC State Historic Preservation Office, the Advisory Council on Historic Preservation, and other parties. AFRH is working with the State Historic Preservation Office and Advisory Council to identify consulting parties to participate in the consultation process. As a result of this consultation a programmatic agreement is being developed that identifies mitigation measures to be implemented as well as preservation design guidelines for the defined character areas in the AFRH.

A detailed transportation analysis was also undertaken to determine the effects to the local transportation network and associated traffic levels from new development on the AFRH. The traffic analysis looked at future roadway conditions without the proposed development and then conditions were assessed with the new development. The master plan alternatives would generate between

3,700 and 11,300 peak hour trips and would have major impacts on intersections in the vicinity of the AFRH.

Under the master plan alternatives the North Capitol Street-Michigan Avenue intersection, the North Capitol Street- Harewood Road intersection, and the Irving Street and First Street intersection across from the Washington Hospital Center could operate under unacceptable conditions. Impacts could be mitigated through roadway improvements, signal modifications, and transportation management plans.

The Washington, DC, metropolitan region is a nonattainment area for ozone which means the level of pollution is higher than government standards. Based on the air quality analysis performed for the EIS mobile sources or traffic would not exceed national ambient air quality standards.

Under all of the alternatives new stationary sources such as boilers would require a formal general conformity determination under the Clean Air Act. Alternative 4 would exceed the new source review thresholds for nitrogen oxide and would therefore require a nonattainment area permit. Air quality impacts could be mitigated through emission controls on equipment.

Construction activities would have short-term adverse impacts on air quality and noise levels in the area; however, long-term impacts to noise levels from increased traffic and site operations would be negligible. The master plan alternative would require new utility connections and would result in increased utility usage. Once complete the new development would generate solid waste and possibly medical waste. All waste would be handled in compliance with local, state, and federal laws.

With that I'll now hand the presentation back to Tim Cox, who will explain the procedures for commenting tonight.

MR. COX: Now we will open the floor to those of you who would like to make formal comments. I will call people to speak in the order in which they

have signed up to speak. Again, if you have not done so you may sign up at the welcome table at the back of the room.

In order to accommodate everyone tonight, the 40 people thus far that have signed up, I ask that you limit your comments to three minutes, please. We have a timer set up in front to let you know when you've reached that three-minute mark. When you come forward please state your name. Spell it slowly for the record. Remember, APRH will not be addressing your comments this evening. All comments will be responded to in the final EIS.

We also have written comments that can be made to us through 6 July 2005. With that we have our portable microphones. Yes? Okay, I see one there, Steve, and one over here. Good, John, thank you. Council members had signed up and I see Councilmember Vincent Orange. He may not be here yet.

MS. PERKINS: Good evening. My name is Linda Perkins. I'm here from the Office of Councilmember Vincent Orange and, as I stated at the side there, we are here to participate and to assure that this would be an open process with input from all persons that are interested in making sure that whatever happens at this site is compatible with the needs of the residents as well as the environment.

So I will not be able to speak on the Councilmember's behalf other than to say that we are here. Any assistance we can provide, please do not hesitate to contact our office. Our number is 202-724-8028 and we look forward to being here throughout the entire process. Thank you.

MR. COX: Thank you. Council- member Jim Graham. Thank you for coming tonight. Appreciate it.

MR. GRAHAM: Delighted to be here. Hello, everybody. I've just arrived, as you could probably tell, but I'm very, very pleased to be here. I'm very pleased for the opportunity for all of us to be here tonight. If you're a resident in the neighborhoods surrounding this great home could you raise your

hand if you live not on the grounds here but you live around? Forgive me. Some of you will understand. If you live in Ward 1 would you raise your hand?

I want to especially thank all of our residents for coming out here tonight because they make the point that I'm just simply going to repeat but your presence here tonight makes the point that whatever happens here we must be assured meaningful, bona fide community neighborhood engagement on these issues.

And people who live in the District of Columbia have gotten accustomed to the sometimes uneasy relationship that we have with our great federal government and we know there are times of ebb and flow between the District of Columbia and the issues that we care about and the issues the federal government cares about. But what we have here tonight is a dramatic and very, very significant show of this message, that what happens on these grounds is important for a number of reasons but one of the key reasons for the significance of these actions is the impact on our neighborhoods. And I'm privileged to represent the great neighborhood of Park View, which is adjacent to this development.

I know my distinguished colleague Mr. Fenty is on the way and he will talk to the issues of Petworth and other neighborhoods that are in Ward 4. But that's the message, include us, involve us, give us meaningful engagement, and you'll find us to be responsible partners in what will be appropriate use of these lands.

Thank you very much.

MR. COX: I've received word that Councilman Fenty is on his way so we'll just put him one or two people back and the next person after that is Jim Caldas.

MR. CALDAS: Good evening. My name is Jim Caldas and I am the president of the Washington Hospital Center, your neighbor across the street. Washington Hospital Center is owned by MedStar Health. I have some general comments and then some specific comments related to traffic impact.

MedStar and the Washington Hospital Center fully support the concept of development of the property being proposed in this plan. As the owner and operator of the medical complex on land immediately to the south across Irving Street we believe that appropriate development compatible with AFRH and neighboring uses is important for the efficient use of land to benefit the community and city as a whole.

This city has limited large tracts of land for development. When large parcels become available for use a variety of possibilities should be considered that maximize the benefits to the community both fiscally and substantively. Because of the character of the land use south of Irving medical, educational, research, and other related institutional uses should be considered.

The major street arteries adjacent to the site such as North Capitol and Irving Streets and Michigan Avenue provide excellent access to the site. A relatively high density could be accommodated so long as residential areas to the northwest are protected. The characteristics of the site with large open spaces lend themselves to appropriate high-density development and counteract urban sprawl.

Metro's red line is sufficiently close to the site that shuttle bus services benefiting all in the immediate community would reduce traffic. The clinical and research components of MedStar Washington Hospital Center's plan have the unique compatibility with the mission of the home and could assist in providing or coordinating development for this important site.

In addition the site would allow the expansion and renovation of the Washington Hospital Center's facilities, which can become a model for the delivery of medical services. MedStar Washington Hospital Center has the capacity and will pursue the opportunity to develop the entire property in an integrated and intelligent manner respectful of both the neighboring community

and the community of residents at AFRH and will be guided by the leadership of AFRH.

With regard to the traffic analysis we believe that the environmental impact analysis of alternative 2 overestimated total peak hour trip generation by a factor of two plus. Am I out of time?

MR. COX: You are.

MR. CALDAS: Let me just summarize by saying that we will submit the points which indicate, we think, that the traffic impact is overstated as outlined in alternative 2. Thank you very much for the opportunity to comment.

MR. COX: Thank you, Jim.

MR COX: Next on our list is Mr. James Carstensen.

MR. CARSTENSEN: You have to forgive me. As a Federal employee it was hard enough to write my comments for a five- minute speech. Now I've to go down to three so I'll try and make my point and get away quick. I'm speaking for several people in the Petworth and Park View communities who have taken great interest in this project. We know that we have to make one thing clear from the outset, that this proceeding, this proposed land lease, is about money.

The Armed Forces Retirement Home Trust Fund in recent years has been depleted. The people of the Soldier's Home want a revenue stream and they deserve one. The people who live here have served and sacrificed for our country and for that they deserve our thanks, our dedication, and our commitment to ensure that they continue to get the kind of retirement lifestyle that they deserve.

The ground we stand on today is precious ground not only for the Armed Forces Retirement Home but for the entire community and indeed the nation. President Lincoln spent a quarter of his presidency here. He walked these grounds. He saw graves being dug for Union troops, he shaped thoughts about the Emancipation Proclamation here, and he talked with soldiers who lived here at the time.

The impact study talks about having no impact on historic monuments. Considering the historic value of these grounds, we ask what is the rush. What is the rush to lease this precious surrounding land for eight- story condos, massive buildings with huge asphalt parking lots, and the accompanying traffic jams and smog? Once the land is developed it's gone forever.

We believe there is a better way. There are ways to generate revenue from the land without destroying it. There are ways to get the Armed Forces Retirement Home the money it needs without building upon one of its most precious resources. Some would have us to believe that this debate is about whether to erect six-story buildings or four- story buildings or to put condos here or there. That's a false debate. The issue is this. We need to make sure that the Soldiers Home doesn't fall under further financial neglect. Let's get the home the financial resources it needs but let's not sacrifice this great asset.

We examined the plan for this land drawn up by a few executives and consultants. We don't see anything in the document that talks about national parks. We don't see anything in reference to recreational trails or recreational areas or even parks for the performing arts like the Virginia's Wolf Trap or Chicago's Ravinia. We don't see the talk of the need to preserve open space for the retired soldiers, the entire community of Washington, and the nation.

What we see is a rush to development. This issue is far too important to take the expedient way out. If we do our children and grandchildren will never see the land as Lincoln saw it. There is a better way. Working together we can do the right thing not only for ourselves, for our community, but for the entire nation and all generations to come. Thank you.

MR. COX: Next speaker, Mark Swert and after Mark it will be Thompson Mayes.

MR. EWERT: My name is Mark Ewert and I appreciate the chance to speak and I appreciate this process. I want to start by honoring the thousand men and women who served in the Armed Forces that live here and also the military personnel for decades and decades who contributed to the upkeep of this home out of their military paychecks.

I also respect the need to raise additional funds to continue supporting this home. I want to talk chiefly about problems that I find with the EIS document but I want to start by talking a little bit about problems that the EIS document finds with the master plan. I would encourage all of you to read the document. It's full of warnings and cautions. If you just skip the executive summary and actually read the document it's very illustrative.

But I also found that the EIS does not account for a huge amount of people that might be on this property. The people who might be patients and visitors to the medical facility, the people who might be visitors to the hotel and conference center, the people who would be shoppers in the proposed retail spaces, and the visitors to the national monument are not accounted for. I created some formulas for those. They are in the letter that I have sent so I won't go over those formulas for the interest of time but there could be up to 50,000 people on this piece of property. That's the size of Harrisburg, Pennsylvania, so if we think that our surfaces around this area can withstand this environment, can withstand 50,000 people all at once, I would be very much surprised.

I'll limit my comments there except to say that I certainly hope that the master plan will be reconsidered, that there will be a new EIS, that the public and the residents of this home will be involved, and with this new plan especially the national monument and its surrounding will be respected. I certainly hope that everyone understands that part of the concern of everybody in this room is the best thing for the AFRH, for the residents, and the surrounding community. Thank you very much.

MR. COX: A brown Ford, Maryland license plate NNK 693, your lights are on.

Tom, thank you.

MR. MAYES: Well, I'm relieved that's not my car. I am Tom Mayes. I am with the National Trust for Historic Preservation. The National Trust is a congressionally chartered nonprofit organization dedicated to the preservation of our nation's resources.

We have a special relationship with the Armed Forces Retirement Home because we are the co-steward, restorer, and operator of the President Lincoln and Soldiers Home National Monument. In that role we just celebrated together with the Armed Forces Retirement Home the restoration of the exterior of the cottage.

We applaud the commitment of the Armed Forces Retirement Home to the preservation of these critical resources, particularly the national monument. We do, however, recognize the critical need of the Armed Forces Retirement Home to raise additional revenue for its residents which they do so greatly deserve. As steward of the President Lincoln and Soldiers Home National Monument, however, we are deeply interested in the future of the site as a whole particularly as the master plan may affect the development and the historic character of the national monument over time.

We therefore urge the Armed Forces Retirement Home to very carefully consider the impacts of the master planning process. In earlier master plans changes were made to the property that we now know dramatically changed the property and affected its historic character. We would not want to see that happen again. In that regard we have three particular concerns about the draft EIS.

First, as you all know, the draft EIS makes it very clear that there will be under these development alternatives long-term direct, major, and adverse impacts on the historic resources. We think the draft EIS needs to be

looked at and modified to address those a little bit more carefully. For example, most of the alternatives that are proposed propose a great level of development and we think that alternatives should be looked at that can achieve some of the goals the Armed Forces Retirement Home is trying to achieve but reduce the level of development and therefore can reduce the impact on historic resources.

Particularly in that regard are the views from the Armed Forces Retirement Home. Many of you know that President Lincoln enjoyed those views and was undoubtedly inspired by those views as many of you all have been. We want to make sure that the development alternatives that are looked at are done in a way that they will minimize the impact on those views over the long term.

We're also concerned about the level to which the draft environmental impact statement looks at mitigation efforts to try to protect these historic resources. And we'd like to see it explore in more depth so that the public can have access to that information, some of these mitigation efforts. Some of this will be done through the Section 106 process but typically in the Section 106 process when it's combined with the NEPA process those mitigation efforts are disclosed so that you all and we can be aware of them and participate in talking about them.

Finally we are also concerned about the cumulative impacts of the development that's proposed and we don't think the draft EIS goes quite far enough in looking at what those cumulative impacts would be. For instance, the cumulative impacts are things like parking needs over time, street construction, and things like that that over the long term will have even greater impacts so we'd like to see the EIS address those.

In closing let me just say that we appreciate the Armed Forces Retirement Home's commitment to the preservation of its historic resources and we look forward to working with you all and with the State Historic Preservation

Office as we look for ways to protect these important historic resources. Thank you.

MR. COX: Thank you, Tom.

Next on my list, Cliff Valenti, runner up, then Lauri Hafvenstein. Welcome, glad you're here.

MR. VALENTI: Nice to meet you.

MR. COX: Thank you, you too.

MR. VALENTI: Hi, I'm Cliff Valenti and I'd like to say that I read the master plan. I hope you guys did too. It's very interesting. It will put you to sleep. But anyway I found that there were a number of contradictions in the plan. For example, in Section 19 it says that minority low-income populations could be disproportionately affected yet in 3-17 it says low-income and

minority populations would not be disproportionately affected.

Someone had said that the traffic considerations were understated. I think they're overstated if anything. Traffic considetations do not include increases from the Lincoln Cottage or the hotel plan for the site, not to mention that it's far enough away from the Metro Station that most people aren't going to walk. Additionally it does not include an assessment of how traffic will be impacted from the new projects already slated for Georgia Avenue like a four-story condo building that's going up there and other projects in Columbia Heights and Petworth. These need to be considered for the area roads around here.

Many sections are too general to have any real meaning. When you look in the detail sections they really don't tell you anything more than what the summary sections say. Under the No-Action Plan it says there will be an adverse economic impact on the retirement home; however, I think this is an

intellectually dishonest statement. A no- action option would have no effect on the current financial situation.

Now, other alternatives for generating revenue need to be considered. Our federal government and American citizens in general have a responsibility to make sure our soldiers are adequately funded in their retirement. Giving up their gardens and green space or prescription drugs, for that matter, should not even be an issue.

Granted, this proposal is the easiest out but it's a Band-Aid. All of the impact summaries show a negative impact on the existing community, more traffic on roads that are already congested. It says that routes would fail, Capitol Street would fail, removal of matured trees, adverse effects on aquatic life, adverse effects on topography, increased noise level, decreased air quality, decreased green space, increase in city and federal services, direct long-term adverse impacts on archeological things. It says the cottage views would be adversely affected.

Only short-term interests of developers seem to be served by this plan. The long-term interests of the residents of DC, the residents of Petworth, and the residents of the Old Soldiers home do not seem represented.

Every option except the no-option plan is huge in scale and 3B shouldn't even be on the table because I read a newspaper article that said the foreign missions and the embassies the State Department isn't even interested in those.

Well, I'm out of time but anyway I think everybody knows my position. Thank you.

MR. COX: Lauri Hafvenstein. Next up then is Sandra Hoffman. Glad to have you tonight.

MS. HAFVENSTEIN: Thank you very much.

Hi, my name is Lauri Hafvenstein and I appreciate the opportunity to comment on this important issue. I'm a resident of the neighboring community

and I would like to disclose up front that I own property that faces one of the parcels for proposed development and as such I obviously share the concerns for traffic and for quality of life in the neighborhood.

But I prefer to focus my comments tonight on my concern for the preservation of the historic value of this property. I think that anyone who had the opportunity, as I recently did, to visit the Lincoln Sanctuary, and I encourage anyone who isn't aware of this book by Matthew Pinsker that talks about the historic significance of this property, I encourage you to get it and read it. You can get it at Amazon and any number of bookstores.

I'd like to echo the comments that Mr. Carstensen made that we are standing on sacred ground and once the cement is poured it can't be brought back. I have read the EIS and I do not feel that enough attention has been given to the adverse impact to the historic landscape. I think that this

impacts not just the neighboring community but the city and indeed the entire nation. Are we developing this land for the nation? It appears that we are not.

There are untold hundreds of thousands that have not yet discovered Lincoln's Cottage. Nor have they yet found the first Arlington Cemetery behind the cottage where soldiers from the First Battle of Bull Run and other conflicts are buried. We should think of the land surrounding these sacred sites no differently than the space around Washington's Mount Vernon or

Jefferson's Monticello. Thank you.

MR. COX: If I could ask Sandra just to hold on a second I see Councilman Adrian Fenty is here so, Councilmember, if you would come please. I'd appreciate it.

MR. FENTY: First of all I want to say I am glad to be back on campus. Most of you may recall that this area of DC was actually in Ward 4 when I was first elected and I was very proud to represent the veterans here at the Soldiers' and Airmen's Home. I want to thank you all once again for your service to the country. After redistricting I no longer represent the area on campus but, of course, Rock Creek Church Road is squarely within Ward 4 so I obviously still have an interest.

And most people who are off-campus don't realize that most of the people who live here at the Soldiers' and Airmen's Home vote right here in the District of Columbia right over on Harewood Road at Precinct 44 and are very active members of the District of Columbia local community. So I want to thank everyone first of all.

I have a formal written statement, which I will submit for the record as follows. My name is Adrian Fenty, District of Columbia Councilmember representing Ward 4. I appreciate the opportunity to testify on the proposed future development of the Armed Forces Retirement Home, Washington. Upon reviewing the draft environmental impact statement and discussing the proposed development with community leaders in the surrounding neighborhoods it is clear to me that any development of the campus of the Armed Forces Retirement Home will have a large impact on the communities around the site, especially those in Ward 4 where I represent.

As you are aware, there is a number of very active community groups which have weighed in on this proposed development and since the likely footprint is so large, perhaps as large as eight million square feet, it's imperative to continue to not only welcome community input but really to ensure the comments and concerns of those affected are incorporated into the final version of the environmental impact study and ultimately the master plan for the project.

I am particularly concerned about the possible impact the new development may have on traffic flow in concert with our existing infrastructure and the historic preservation issues associated with the property which were just so eloquently addressed. Development of this property provides a rare opportunity to create and make available open park space for community use as well and it could influence the economy by incorporating some of those values.

I therefore firmly believe that any successful project at the Armed Forces Retirement Home hinges on buy-in from the community inside the gates and also buy-in from the surrounding communities. I look forward to working with all parties to facilitate this involvement and to ensure the formation of a true partnership as this very important project moves forward. Thank you very much and I'll be happy to work with the Armed Forces Retirement Home and certainly the community as this goes forward. Thank you very much.

MR. COX: Thank you. Sandra Hoffman and on deck is Robert O'Brien.

Welcome, thanks for coming.

MS. HOFFMAN: Thank you for allowing me to testify this evening. I have specific questions that address many of the similar concerns that have been raised already tonight. My name is Sandra Hoffman. I live at 7th and Taylor Northwest, about six blocks west of Soldiers Home. I have some very specific things that perhaps are examples of how the home could impact us.

Because of the significant lack of

recreational park space in this area children throughout our neighborhood frequently are using our streets as places to play, to ride their bikes. It's a significant recreational resource. This is a neighborhood of single- family homes with many children and many families who are expecting children as well.

The proposed development plan on this site will significantly increase traffic which I would expect will remove the use of streets as a

relatively safe place for recreation as they are being currently used and I'm interested in hearing how the plan expects to replace that recreational resource that will be removed from our community.

The second question I have is the federal elements of the comprehensive plan for national capital provide the guiding criteria for this development from what I understand from the EIS. One element of the federal elements is to enhance park and open space system of the national capital region and to ensure adequate park and open space for future generations.

We are currently seeing very dense

residential development throughout Columbia Heights. We are very soon going to be seeing groundbreaking on two large projects on Georgia Avenue and we hope and expect to see much more of that along Georgia Avenue And Sherman Avenue and I think the neighbors very much welcome that kind of dense residential development.. I may be speaking for myself but so far we've been able to work things out with planning. Everyone is going to work for the neighborhood.

Those developments are within two to six blocks of this space. As I said, we are already experiencing a lack of parkland for recreation in this part of the city. This is one of the few large remaining open spaces available in central DC so my question is why isn't a sizeable park part of the development plan for this site and in particular I would think that Area 6 looks like it would be particularly appropriate.

Among the alternatives that are considered, like prior speakers, I'd like to urge the Armed Forces Retirement Home to work with the DC government and federal government to find alternatives for funding or for land use including

possibly exchanges of land with other federal agencies where perhaps you can find a site that would be more appropriate for development and then perhaps this can become a park. Maybe that's a way to work things out.

MR. COX: Robert O'Brien. Next up then, Ted Mariani.

MR. O'BRIEN: I'm Bob O'Brien, and I'd like to talk a little bit about this thing. We seem to have four proposals on the agenda, all of which have been developed with little or no input by the residents. As I see it, this meeting and the previous one on the same subject only summarize the proposals being submitted to EPA. At the first meeting I attempted to have it clarified as to which proposal the administration was favoring or was more in favor of than others. I was not successful on that. But I find it difficult to believe that they do not have a distinct opinion about which of these plans should be the one to be accepted.

The next remark I was going to make, when I look at it it appears to be too derogatory. I will not make it; however, I do think it's premature to submit these proposals without residents having had the opportunities to become more familiar with the plans and the effect it will have on their lives here at Armed Forces Retirement Home. Thank you.

MR. COX: Ted, then next up is Michael George.

MR. MARIANI: My name is Ted Mariani. I'm an architect and engineer here representing MedStar Health Institution just to the south of the home and they have an interest in developing the property. We have a great deal of concern that the EIS dramatically overstated the transportation impacts of the development in alternative 2.

As Mr. Culdas said, it was a factor of two times what it will really be. The principal reasons for this were the study indicated that the land that is indicated for educational purposes, which is graduate medical education, was treated like it was a community college. This gives you a factor of six times of what you would really have. Also it failed to account for the fact that a lot

of the uses would be moved over from the Hospital Center so you're double-counting the traffic which would be taken away from the streets because of that.

They failed to recognize the fact that in a medical facility shift changes occur at nonpeak hours. People come to work before 7:00 and they basically leave before 3:00 so you do not have the peak hour impacts.

Another issue was the parking that is indicated in the EIS calls for over 16,000 parking spaces. Now, that's really more than twice that you would ever really need on this campus for the development under alternative 2. Just to give you an example, the NIH, which is significantly larger than anything that would be developed on this campus, only has 8,000 spaces.

So I just want to suggest that before the master plan proceeds much further there should be a much more rigorous transportation analysis and this is good for everybody, not only the potential users of the site but for the community to understand the real impacts of the transportation and the parking requirements. And that should be undertaken, I think, as soon as possible because right now what you're seeing is something that is so dramatic that it just frightens people and that's not the reality of the situation. Thank you very much and we will submit a written statement for the record.

MR. COX: Thank you. Michael George and then D. E. Douglas.

MR. GEORGE: I'm a home resident and I'm against getting rid of our land. They tell us it's for the trust fund. Nobody ever sees this trust fund. If they want to do something with the land make a national cemetery out of it. If they got to take it from us make it a cemetery for the Soldiers Home. They're running out of cemeteries. That will work.

MR. COX: D. E. Douglas.

MR. DOUGLAS: David Douglas.

MR. COX: I have D.E.

MR. DOUGLAS: David, right, thank you.

MR. COX: You're welcome. Thomas Rooney up next. Thank you, Mr. Douglas, glad you're here.

MR. DOUGLAS: More than welcome. I'd like to thank the soldiers for coming out. My name is David Douglas and, talking about a neighbor, I am a neighbor. I'm 40 feet from the Soldiers home and the young man from the Hospital Center that said he was a neighbor, that was part of Soldiers Home. That was the apple orchard that I played in.

They had another meeting here when they put the three hospitals down there, Veterans and the Hospital Center, and they said that they were going to move the orchard and now that's the parking lot for the cathedral. That's where the orchard was supposed to be. So let me tell you once they start they are not going to stop.

You can come in any gate in this place. I caught my son how to run cross- country right in this park. Security got bad and instead of trying to solve the problem they locked the place up. And you can't keep fear out. You have to face fear. You can't just keep locking yourself up. And that's what you have to do. And if you let them start pouring the concrete you are going to lose this place and you need it. Thank you.

MR. COX: Thomas Rooney and then Lisa Swanson. Hi there, glad to have you here.

MR. ROONEY: My name is Thomas Rooney. I'm a long time resident, 50 years plus, of Brookland, which is just down Michigan Avenue from here. I've been involved in a lot of things in the city here, including McMillan Park across the way, our Metro stop, and a number of other things. What I'd like to talk to here is a few comments about the traffic that's listed in the EIS statement.

First of all the DC Office of Planning has stated there will be no major highway. This is from some of their own propaganda. DC will have no

major highway improvements to 2025. And that's from the Regional Plan to 2025, the year 2000 update to constrain long-range plans.

So the long-range plan is there is

no money to improve the roads. Well, back in 2001 when we got this information some from workshops they were doing on McMillan the North Capitol and Michigan Avenue intersection was a level of service D in a range going to F, failure.

The Office of Planning's solution to the coming traffic crisis was, "The developers will have to coordinate mitigation with other major traffic generators to solve traffic issues." From that gobbledygook it seems that DOT is not responsible for the traffic and the developer is going to be responsible for the traffic but how does a developer be responsible for the traffic when in the EIS statement they admit that North Capitol and Michigan, Harewood Road and Michigan, and First Street and Michigan all will be rated F? Currently they're rated D so we are only one step from F.

So all of this additional traffic will have a humongous impact. On page 441 labeled "Trip Generation" is expected from the development AM peak hours 11,310 vehicles. That's per hour. PM peak hours, 9,960 vehicles, that's per hour. So that is not workable. Everything will clog down.

Interestingly enough, the DC DOT put out a little pamphlet the other day, mailed it around to residents about what to do when we get attacked by terrorists or whatever, how are we going to get out of the city. Well, I happen to notice on the map on the back that if you live in this area of Brookland or any place in between on North Capitol and Michigan you either go out Georgia Avenue or Rhode Island Avenue and somehow North Capitol is left off. You don't go out North Capitol.

And I guess they're recognizing from their own propaganda here that it will be completely unusable and that's now, not in the future sometime. I

just wanted to point out quickly that this EIS is not in a development vacuum. There is a development proposed for the McMillan Reservoir which is horrendous. It doesn't take into account the current development going on or expansion on the campus of the Medical Center and they're building a 1500-car parking building right now on the corner of First and Michigan.

It doesn't take into account the six or seven acres that were up for development at the corner of Irving and Michigan and they are still up for development. The Hilton outfit was going to build a convention center and hotel there but now it's up for grabs, six or seven additional, and Catholic University owns two or three city blocks that are up for development. So I just wanted to point out the traffic here is going to be a huge and unsolvable issue.

MR. COX: Lisa Swanson and Arlus Stephens. Thank you for coming.

MS. SWANSON: Thank you. Hi, I'm Lisa Swanson. I run, I bike to work, I recently acquired a dog through marriage who likes to walk around here. I'm a member of the executive committee of the Sierra Club in the District of Columbia although I'm not speaking for them today. We'll prepare a statement later but I live across the street on Illinois Avenue so I'm here in that capacity.

I can't talk about everything in the environmental impact statement, of course, so I'm glad other people are talking about other parts of it but two things stand out. If you look at the map of the District of Columbia this is huge. This is a huge, prominent green space that needs a lot of attention.

Anything that happens here will have a lot of effect not just on the perimeter neighborhood, on the Chesapeake

Bay, the Potomac River, all of the greater environment that we're not really talking about tonight, so we can't forget about that.

And the second thing that jumped out at me was this number that's come up a couple times, 17,000 parking spaces. I think the Home Depot maybe has 500 or 800, something like that, so 17,000 is phenomenal and that to me is a huge problem. The statement mentioned that there are three Metro stations close by. I think they're walkable, not everybody thinks they're walkable, but this area is completely underserved by buses, as the previous guy mentioned or someone else did, two near the hospital, one on Rock Creek Church, zero buses on North Capitol.

So if somebody is planning on needing 17,000 parking spaces they are thinking about a lot of traffic and I know that's the maximum. Today's Washington Post has a story that I hope everybody would look at. The title alone is exciting to me, "Mini-city Plan Discourages Use of Cars." There is a plan underway right now in Vienna, Virginia, to completely rethink the use of cars in an urban area.

I'll just read you one little section of what the planners had in mind there. To invite the potential residents not to own cars include showers in offices for bike riders, personalized traffic trouble- shooters for residents, handy Zipcars or Flexcars, these very short-term rentals that the District has available, free smart cars, free company cars. Instead of assuming 1.6 parking spaces per condo they're going to cut that down to 1 and basically force people to think about getting out of their cars.

I bring this up because I think not to think like that in any kind of development that will impact such a huge area on the map would be a missed opportunity to think differently about how space is developed. I know some people think there should be no development here at all. I'm with the Sierra Club. You might think I'd say that too but sometimes development in an already developed city area if it's done well, if it's done ecologically and with the people in mind, is better than creating a sprawl elsewhere and knocking down trees in a lot of other places.

Thanks.

MR. COX: Arlus is next and then on deck is Vonnie Cruel. Thank you.

MR. STEPHENS: Hi, good evening, everybody. My name is Arlus Stephens. I'm a neighbor. I'd like to thank Mr. Cox and I'd especially like to thank all the men and women who are residents here at AFRH Washington not only for their welcoming us here tonight but also for their service to our country.

I have a couple of quick points. First all of this could be remedied very quickly if the Defense Department found it in their hearts to put a line item in their budget which would just fund the home. The last I heard they were getting quite a lot of money. Secondly I want to speak to the environmental impact statement. I believe the methodology was flawed in that there was not enough input from residents and also from the neighbors to the home and I'm speaking in particular with respect to Parcels 5 and 6.

Abraham Lincoln, when he would come up here rode up Rock Creek Church Road, which, if I'm not mistaken, actually bore that name back in the 19th century, and he rode up right where you ride up today. I don't know if Park Place and Randolph Street were there but Rock Creek Church Road was there.

Destroying that parcel, which all of those alternatives except for number 1 do, is a shame but short of that I think the environmental impact is great and better alternatives could be proposed if there was a dialogue with the community which I respectfully submit there really has not been any such dialogue.

One of those possibilities discussed earlier is to maintain some kind of green space and I personally support that. I understand that parts of Parcel 6 still have an agricultural use and they've had that use dating back to the 19th century when the residents here were self-supporting food- wise and I would submit that that should be protected. Thank you all very much.

MR. COX: Vonnie Cruel and then next up Frances Clarke. Vonnie Cruel? Is Vonnie here? Okay, I'll circle and just come back. Frances Clarke?

Frances Clarke? I'll circle that one too. Andrew McGluray? Andrew? Thanks for coming.

MR. McGLURAY: Evening, everyone, and in particular good evening to the residents of this Soldiers Home who are here. As everyone else has said, we really value the service that you've given to our country and those of us who live in the neighborhoods adjacent to the property really feel that we have an awful lot in common in terms of our interest in seeing this property not just blindly developed with only an eye towards the short-term gain of some money that really doesn't solve the long-term problem that the AFRH is facing.

I just wanted to make a couple of points and I'll be actually submitting many more points in writing but it seems to me that one thing that has not been done is to consider the impact of the Lincoln Cottage as a coming tourist attraction, which apparently is what the National Trust has in mind for it, and not just in terms of looking at overall traffic and then averaging it out over a year but the fact that that traffic may be concentrated on a certain number of weekends a year, a certain number of times on Saturday mornings, or whatever that would significantly increase traffic volume. And then if you add into that the number of cars from new residents for condominiums or apartments that are also going to be feeding out on to Rock Creek Church Road or Park Place you could have a very bad situation for the existing neighborhoods nearby.

In addition I think the EIS really doesn't consider seriously enough the impact on what they call the historic character areas and Arlus was speaking about one of those earlier. And what's really bizarre to me, if you look at the map of the parcels proposed for development in the EIS and then you look at the map of what are considered the historic character areas, it's almost a perfect overlap.

It's like they've picked essentially the areas with the most historic significance as those to sell off and I realize there may be some reasons for some of that but it doesn't seem like something that's very wise and they really

ought to look at at least avoiding the areas that are considered to have historic character.

In addition there is a factor I don't think has really been considered which is something I think is called the heat island effect that in cities you have buildings and concrete that absorb the sun's rays and then basically hold heat and keep an area hotter than what otherwise would be. And, as Sandy was saying to me earlier today when we spoke, her plants bloom two weeks later up here than they did it when she lived in Dupont Circle because it's cooler up here in part because the Soldiers Home is here with all this green space and if you pour the amount of development that this plan talks about into that green space that is potentially a huge impact on the climate of this little part of Washington, DC, potentially a lot more heat and more intolerable summers. And I'll wrap it up very quickly but I think the EIS has to address that.

Finally let me just read you a quick quote from the comprehensive plan for the national capital area which supposedly guides this development process. And it says that, "The federal government has to manage property in a way that promotes the national capital region as a leader in environmental stewardship and preserves, protects, and enhances the quality of the region's natural resources, providing a setting that benefits the local community, provides a model for the country, and is worthy of the nation's capital," and I submit to you that the plans that we've seen do not do that.

Finally the community both inside and outside of the Soldiers Home gates has to have a substantive role in the planning process for any development. Thank you very much.

MR. COX: Tim Dennee, next up then, Angela Washington.

MR. DENNEE: Good evening. My name is Tim Dennee. I am an architectural historian with the DC Historic Preservation Office and our role is related to the Section 106 process. To summarize very briefly what Section 106

is all about, the Congress at some time in the past decided that it didn't make a lot of sense to have federal projects destroying or otherwise adversely affecting historic resources unnecessarily.

And so the National Historic Preservation Act now has a process by which federal projects, those carried out by federal agencies or with federal funding or federal permits, go through a review process. This process puts the responsibility of compliance on the federal agency and it makes the agency responsible for, first of all, seeing if historic properties are present and how they might be affected and then considering how those effects, if adverse, can be avoided, minimized, and/or mitigated. And it gives the federal agency a certain responsibility for self-criticism in review. Also, though, every state and Indian tribes and some of the territories have preservation offices. The District of Columbia is essentially a state for the purposes of Section 106.

So we review projects and we're reviewing this master plan which we received a couple of weeks ago. In addition, particularly on a project of this magnitude and this significance, the Advisory Council on Historic Preservation, which is the overarching federal agency responsible for Section 106, is already involved and will undoubtedly be involved in depth. This is really just the beginning of the public consultation process. This is the agency saying here's generally what we want to do.

In the master plan the agency has acknowledged that there'll be significant adverse effects by any of the alternatives but the no-build alternative. And what that means is that we will have a consultation which means essentially working meetings.

And I encourage the audience to request as you're making comments about the EIS or in lieu of or in addition to to request being a consulting party. Typically consulting parties are groups because they end up being working meetings. It's hard to get all your questions asked and answered in a forum like this.

But typically in DC the consulting party sessions and the consulting parties usually include ANCs and other neighborhood groups, historic preservation groups. Certainly in this case the residents both of the home and beyond the boundaries of the home and the National Trust will obviously be involved as will probably the National Park Service and any other groups that see themselves being affected.

That's essentially the procedure and we'll get that underway. I don't mean to hold you up but I got a couple other things. I think at first glance we certainly see the home's need and desire to gain more revenue and it does seem like there are avenues to place more development on this property.

I appreciate all the comments that were made earlier very eloquently about the significance of this property because it is really a significant campus with remarkably significant buildings, not to mention the adjoining neighborhoods, and I think that whatever happens here has to be seen in the context of placing new construction within an existing campus.

And what we would really not like to see is that campus becoming something other than a campus or being reduced to a much smaller campus with something else that's completely unrelated. And so at the outset I have to admit that we have some concerns about the bulk proposed.

And it seems like if you look at the alternatives you go from a no-build option up to 6 million to 8 million square feet, which is quite substantial, and it seems like there's a lot of daylight between the no-build option and 6 million square feet. And I say that simply by way of suggesting that there are probably other alternatives that should be considered within at least the Section 106 process to see if we really covered all our bases, and that's what Section 106 is really about.

So my final comment is that I think a further step, perhaps the next step, is to have the consultants for the home suggest how at build out this might be masked essentially in two dimensions try to present three- dimensional

axonometric picture of the campus with the bulk of the buildings and how the parking facilities would lay out. And that would give everybody a pretty much better picture of what's actually being suggested. Thanks.

MR. COX: Angela Washington then next up is Alexey Volynets.

MS. WASHINGTON: Good evening. I'm Angela Washington and I'm a resident in the Park View area and, of course, I have a bias and interest in this development. I live on Park Place and I have a bird's-eye view of Zone 6 basically. And for many years, about 10 years, I have watched the soldiers garden every summer from spring to the fall in that garden and I love to watch that.

And I'm quite sure everybody along that street who drives down the street and lives on Princeton, Otis, whoever you are, you enjoy that also. I've also been given fruit, watermelons, what have you, from soldiers. I've also watched deer, wildlife, run through there. I've watched raccoons, you name it, run through that park. So there is wildlife there, not even minimal.

Also my problem is you have in your master plan you want to respect the character of the adjacent community. And I'm really concerned and I'm concerned with the whole plan but in Zone 6 from your map you have alternatives of do nothing, residential, and you want it compatible with the area. And I hear condos. That area from Park Place to, I guess, Georgia Avenue and beyond is basically single-family homes, maybe town houses. You're talking about putting eight-story, four-story condos. That doesn't fit in with the structure.

Also we have alternatives for institutional and embassies. That doesn't fit in with the structure. I can't imagine having an embassy across the street from me, at night parties, noise, large parking lots, lights. It's unconscionable. And I just want that put in the record. Zone 6, a park sounds great. If you have to develop develop something useful for the community. That's my view; I think that's your view also, not embassies, not institutions, not condos.

Because I want you to also know if you go to the top, because I've had tours from the residents here, where we are right now, and you look west what do you see? The best landscaped view in the world. You can see clear to the cathedral. That will be gone with embassies, condos, for you all, you residents. That beautiful view will be gone.

So please consider what you're doing to the community to the west. I can understand developing to the south and to the east. Nothing's on North Capitol. You're not facing residents. You're facing a commercial or medical on that side. Maybe that's fine if you have to build and raise revenue. But, please, Zone 6 reconsider.

Thank you.

MR. COX: Alexey? Next up then is Joseph Martin. Thank you, glad you're here.

MS. VOLYNETS: Hi, my name is Alexey and I'm a Petworth resident, and many speakers discussed ways in which this development can negatively affect the neighborhood. In other words basically this development will decrease the overall quality of life in the neighborhood and potentially even impact the property values and the rejuvenation of the neighborhood that recently has been developing pretty quickly.

So I believe that this plan has to have something that tries not only to mitigate the negative impact but to bring some active benefits to the community and a park would be one of those things and a park with a nice playground for kids and others. And I believe that this park actually would be beneficial for the home as well because in any city you can see that if there is a nice, good park, you can look at Rock Creek Park or Central Park in New York, it increases not only the quality of life but it will help you to increase the price that you will get for your new developments as well.

So at the end I believe that a park will be beneficial for the home and will be beneficial for the neighborhood. Thank you.

MR. COX: Joseph Martin?

MR. MARTIN: I'm going to pass.

MR. COX: Okay, thank you. Alfred Napfloat and then next up Thaia Grace. Alfred Napfloat? Did Vonnie Cruel come back? Frances Clarke? Thaia Grace. Suzanne Welch? Suzanne Welch? Jacqueline Attendee? After Jacqueline I have Bill Crandall.

Thanks for being here.

MS. ARENDT: Well, I've been very impressed by all of the prepared remarks and all of the thoughtful comments that everybody's made. I don't have any prepared remarks or probably as thought out a response as a lot of people have had but I just would like to echo the neighbors in the Old Soldiers Home as well as the neighbors outside that we might be losing the forest for the trees here.

Everybody has been talking about the number of parking spaces and the amount of traffic and, I mean, they're not small when you get to that point but I'm not sure that we as a group have even considered the value of development at all except in terms of getting money for the Old Soldiers Home and I think that's fine but perhaps there is another way to think of that need for revenue and ways to fulfill that need for revenue and think about what we want to do with this wonderful resource before we even get to the number of parking spaces and the number of cars. I mean, that seems to be so far in the minutiae that this community hasn't even had input yet on whether we want that at all.

And I for the record would just like to echo the majority of neighbors in that we're not convinced yet that this is the best thing for the larger neighborhood as well as the immediate neighborhood of the old Soldiers Home. And we hope that this input period will help the developers to rethink the whole idea and to reconsider such large development and perhaps consider parks and more gentle ways of using the space and, to quote my punning husband, we want parks, not parking spaces. Thank you.

MR. COX: Bill Crandall? Next up then is Jeff Taggert.

MR. CRANDALL: Thank you. My name is Bill Crandall. I don't really have any prepared comments. Everyone else has articulated many things very well. But I did want to say that I think that in this case as in a lot of cases the argument is often framed as open space, meaning do nothing, versus big ban concrete development, which is often what we get, especially when the process is driven by money and by the interests of the people doing the building.

And I just think that the answer is to me obviously somewhere in the middle. It's unlikely that there will be no building and it would be a real shame if there was clumsy blunt instrument over-building and thoughtless building that only served the developers. So I think that the real key is the quality of any development that comes and the diversity of that development and how well integrated it is into the community, how well it serves the residents of the home and also the residents of the communities around the home, and how thoughtful in design it is, how nice it is to look at.

I mean, if it's a bunch of parking lots with big buildings no one's going to be very happy about that except the people who built it. So I think that one of the best ways to ensure a better outcome is to make sure that the community has their say, which they're having tonight, and I hope that they'll continue to have over time. And I think that'll just bring us to a better result and so I hope that continues and that's about all I wanted to say.

Thank you very much.

MR. COX: Jeff Taggert?

MR. TAGGERT: I'm going to pass and then make a written submission.

MR. COX: Thank you, Jeff. Drew Toldrin (?).

MS. STEPHANSON: He left but he's my roommate so can I speak in his place?

MR. COX: You take his place? Yes. You just can come up, and spell and state your name for me, please.

MS. STEPHANSON: My name is Sheri Stephanson.

MR. COX: Thank you, Sheri, for coming here.

MS. STEPHANSON: Hi, there. I wasn't planning on talking either but I've been pretty compelled by the comments that I've heard so far and decided I needed to have a little input. I actually haven't read the EIS yet but I will and I appreciate the thoughtful comments of everyone who's come up so far and raised so many important issues.

I want to highlight a couple of things that I'm not hearing. One thing is, I don't know if anyone read in the Sunday's editorial of the Washington Post they were talking about development, some activities that are happening in or near Seattle, Washington. I used to live out there.

There are lots of really innovative ways being proposed in Seattle and other places around the country to preserve land while simultaneously raising revenue in this case for maintaining the Soldiers Home. The things that haven't been brought up tonight are land trusts. There are things called conservation easements where they pay farmers to preserve open space and agricultural land.

I don't have an exhaustive list but the point is there are lots of really innovative mechanisms out there for preserving land and raising money at the same time and I would like to see that considered in this plan as an option. As other people have mentioned, the options go from nothing to lots of development and there really are lots of spaces in between where we can still see preserving some of the open space values of the land.

The other thing I haven't heard at all, only a couple of times has there been any mention of the impact to the low-income residents of the neighborhood. No one's really talking about that and I think it's something that we need to talk about and, like I say, I haven't read the plan so maybe this is in there. I don't know but anywhere in the proposed residential

development does it state that a certain portion of that has to go towards low-income housing?

I'm new to this area but I imagine that some of the older residents are feeling the increased value, the dramatic increase in value, of housing which is of a benefit but also we all know it tends to push people out. So I think that's something that if housing does end up in the final plan there needs to be some consideration for providing low- income housing for residents. I'll leave it there. Thanks.

MR. COX: Avis Anderson? Avis Anderson? Dean Kern? Dean Kern then next in line. Thank you for coming tonight.

MS. ANDERSON: Good evening. My name is Avis Anderson. I actually hadn't intended to speak tonight but I feel the need to speak as a native Washingtonian and a member of this neighborhood from all of my life. I recognize that there is a funding shortage. Much of what I have to say will mirror comments that have been made before but I feel they need to be emphasized again.

The funding shortage, I certainly agree with the gentleman that spoke earlier that said that this administration needs to simply add a line item that addresses the funding shortage. If we can send our family and friends off to war we can certainly fund a place for them to retire.

I mean, there are creative means of funding these shortages. They can utilize the current funds for our soldiers that are in the armed forces now. And I don't know why I'm speaking to this because I'm actually a real estate agent and so it's speaking against me but I'm more concerned about the people at large.

I'm concerned about the impact that it will have on the real estate here and the people here. The heat, I can't stand the heat and you're talking about an abundance of redevelopment here on this site. That doesn't include the

site that's planned at Kennedy Street or the one planned at Lamont Street where the old Linens of the Week was. That's more condominiums.

It's only 64 miles radius, the District of Columbia. What are we going to do with all these people? The traffic, the congestion, it just makes absolutely no sense to me. What it does not address in any of the plans is the positive interaction between young people and the retired veterans that are already on this campus or that will come to this campus. If they're going to put something on this campus that includes young people bring the young people together with the elderly so that we can benefit from what the elderly have to give to the young people. That's why this country is on its way down.

MR. COX: Dean Kern then Joyce Covington. Dean, thanks for coming tonight.

MR. KERN: Thank you.

MR. COX: Welcome.

MR. KERN: My name is Dean Kern. I'm a resident of Luray Place over by the number five development. I've only been here for a year. I grew up outside of DC but moved in last year. And I'm not afraid of progress. I want to see this area developed. I would love to see much of what has been discussed here and I have a lot of trust and faith in the process and that a lot of the details will get worked out.

And I doubt I'll be involved in that but I figured at least one person ought to come up here and say that this development ought to happen. I think it would improve a lot in this neighborhood in regard to the resources available to police the neighborhoods. Well, I don't know but there are a couple of things I would like to see, and number one is when I first moved here I'd jog around this property and was able to do so because one of the lanes of North Capitol was blocked off for construction.

But I thought it was such a pity that the place is barb wired off and fenced in and I remember seeing some of the soldiers and thinking to myself I

would love to just run over there and say hi to them and being fenced off from being able to do that.

I'd like to see a place to walk a dog because I have one and I love her and I love walking my dog. I'd love to see a park. I'd love to see a place for kids to play and if it's an improvement to go from the streets to a parking lot so be it. I'd love to have a place to have a beer, to buy some sundries, and I think that it's fun to live in this city. I would love to have a place to walk to rather than have to drive wherever I'm going in order to buy some things. So bring it on. Build it.

MR. COX: Joyce Clovington? George Bailey and on deck is Sherilyn Adams after George. George, thank you for coming tonight, pleasure to meet you.

MR. BAILEY: And nice to meet you. Hello, my name is George Bailey and I came to Washington because I enjoy the great community here and it can be a greater community. I hope that this potential development will make it a greater community and not a lesser community. I'm plain spoken here so I don't have prepared remarks but there are some things that I think should be questioned or we need answers on some possible problems with the environmental impact statement or potential developments here.

First as a general principle I believe this is public land, all public land, we're discussing here and that public land should be used for public purposes. I agree there is now presently a problem with the financial endowment for our great veterans who have retired here and I give you compliments and thanks for your services.

There are also many in my family who are veterans and will be retiring soon or are in that age. There actually should be a plan that includes more facilities for retiring veterans here and increasing services for veterans.

I would hope that that would be some option that they look into that is possible to be financed and to be responsibly financed while also being a good stewardship for the land here in DC. We're all important citizens here

that have a right and responsibility to speak up for a good stewardship of the land in our neighborhoods. I am also a neighbor in this area.

I have a vision that there could be smart growth in this area which includes green buildings. If you have to take away green space, and there's a question whether that's really necessary, but if it is necessary do build green buildings, buildings that are environmentally responsible, both environmentally and ecologically and energy- efficient buildings. What better compliment could you give to our retired veterans that we are now responsible for having a clean environment and energy independence right here in DC as much as possible.

Another thing I would have to say is there has to be caution with the vision. Be very cautioned that there are not sweetheart deals in such types of potential developments. There have been things that have an appearance of bad stewardship, bad in that there are deals that could be construed to be not in the public interest but in private interests. I'm very much for public and private cooperation. Yes, we need to use both public goods and private initiative to meet our great needs.

One thing that also is very obvious with the plans is that if you all look at your maps they have parcels, one, two, three, four, five and six. All the alternatives seem to be you do all of them or none of them. An alternative could be you can do one or two or three or four or five or six but not all of them, just sufficient to meet the needs for the future, to have a strong stewardship for our veterans' homes here. So I hope that can be looked into better. Thank you very much.

MR. COX: Thank you, George. Sherilyn Adams? Next on deck then is Lewis Mariem. Sherilyn, thanks for coming.

MS. ADAMS: Thanks. I live right next to the cemetery and I've been living there for about 10 years. I learned about this meeting through a community e-newsletter and this meeting right now is my second source of information about this so I have not read the report. I didn't know that there

was a report. In fact my questions primarily surround the question about how open is the process.

In the e-mail that was sent around it talked about conversations were being had with unnamed developers. My question is who are these developers? How come they're not named? Have they already been promised some stake in the development? How will the final alternative be determined? What are the criteria to select the plan? What are the criteria to select the developers?

Have the developers had any kind of success doing this kind of development in the past? Is it the reason that we're having all six of these plots developed because these developers have come together and they say this is the way to do it and if we don't do all of it we're not going to do any of it?

How will this affect the property values of the existing properties around the area that's to be developed? How will this impact the taxes that the homeowners pay? Will the campus be a gated community? Will you all be creating a gated community within a community which would definitely have a negative impact on the surrounding community?

Once whatever is created is created will people have easy access to get into the retail facilities or will it be just for those that are living inside the gated area? And what is being built into the plan to benefit the residents of the wider community? Like people have talked a lot about parks and recreation. I live right next to graveyard. I walk around the campus a lot to exercise.

It's beautiful, it's green, and I have to be honest. I've never been on the campus. And when I drove in today I was amazed at how beautiful this place is. I said no wonder developers want to get their hands on this thing. I understand. What I'd really like to see is more members of the community having an opportunity to see what it's like and get on it.

And I think my problem, the reason I never came on it before, is because I do drive up and down North Capitol all the time and I see the barbed

wire so it doesn't look like as an inviting place for me but maybe it could be. So I really hope that this isn't a done deal and this meeting is just a formality, step one, two, three, four, five, six, okay, this is the step where the community gets to hear what's going on. We did that, check. Next? I hope that's not what the case is. So that's my two cents. Thank you.

MR. COX: Lewis Maiden? Next up then is John Zoltner. Thanks for coming. We appreciate it.

MR. MAIDEN: I was born in Washington, DC, and my grandparents and great-grandparents all played around here. We should think about this place like this. Washington, DC, is America's jewel box. This is one of the jewels. Think about the children that are going to be coming home real soon with no legs and no arms that should see this place the way it is. Forget our view but think of what it is. Give those children something when they come home like the soldiers that we honor that have it now.

Make it better. Maybe there should be a cemetery on the other side but it stinks. I haven't read the plan, don't want to see the plan. I think the plan look good in the trash. Protect America's jewel box, Washington, DC, and the gems that are in it. This right here is one of them. And put your greed in your pocket and go on home. God bless you and thank you all for coming out.

MR. COX: John Zoltner? After John Cathy Boylin. John, thank you for coming. Appreciate it.

MR. ZOLTNER: Hi, I'm John Zoltner. I'm a 20 year resident of the District. I'm new to Petworth but started working with youth on juvenile probation in Petworth out of St. Gabriel's Church in 1987 and a lot of people have talked about the financial resources and maybe there are other ways to get those resources for AFRH.

I just want to call attention to the fact that I haven't seen anywhere any kind of analysis of what amount of money is needed to restore that trust fund to a level that would be sufficient to maintain a well- functioning

soldiers home and I think that's important because in the absence of any kind of amount or a goal then what we switch to is just trying to get as much money as possible and, looking at what we can tell of the master plan from the environmental impact statement, this is clearly a plan to get as much money as possible.

And I'm sure a lot of interests and a lot of people will make money off the implementation of that plan but I think a lot of people have said clearly today that we value the Soldiers Home, we value the soldiers, and this is a resource that is unlike just about anything else that's in the District and pretty soon it can be gone if the community doesn't get a chance to give our input into what can happen.

And one thing that's curiously missing, I think, in everything I've read is there's very little in this plan about the quality of life for the soldiers and airmen and there's very little that talks what that's going to be like besides taking parcels here and there and obviously they're going to be living in a much smaller space and I'd like to see some detailed planning, not seeing what I can judge from looking at the environmental impact statement but I'd like to see the direct master plan and hear a lot more detail from AFRH about what they plan to do.

And, again, I would second that I hope that this isn't just a checkmark being checked because a lot of people in the community and in the home itself have a

strong interest in this project and it's really going to affect our lives. Thanks.

MR. COX: Cathy Boylin? After Cathy, David Jamerone (?). Again, welcome. Thank you again for your time, appreciate it.

MS. BOYLIN: Hi, I'm Cathy Boylin. I live at 503 Rock Creek Church Road Northwest so I'm diagonally across the street from the beautiful garden that the soldiers here tend. We are the Catholic Worker. Ironically the Catholic Worker are pacifists and really in the long vision of pacifists our work is to make sure that there are never again any more old soldiers. We love the people but we're trying to abolish war. We think war is the crime, not the people who fought it or are being victimized in it or whatever.

One of the things that we do every Thursday is make a meal for about 100 people and we take it down to the parks right by Lafayette Park, by the church that President Bush attends, and lots of the people who line up every Thursday for food from us are homeless veterans. Then we go around the corner and we are at McPherson Square where about 70 people line up for food there and most of them are homeless veterans.

I would like you to remember that there are at least 10,000 seriously wounded young men and women from this current slaughter and they're talking about closing Walter Reed Hospital. I wonder if that is because they have development on their minds at the expense of the old soldiers and the young soldiers who are the victims of people's violence, mistakes, and I call it other things but anyway I'd like us to consider, and I don't know if there could be changes, how to make money for the old soldiers.

I agree with the people who say the federal government should have a budget allotment. If they can give Halliburton unbidded loans to build prisons in Guantanamo Bay they certainly can find the money to pay to keep this home open and to take in some of the veterans who are living in the parks or in the shelters that are closing down and then use their check. Whatever the check is that they get, that could be the rent to live here at the building and then they could have a stipend. I don't know but I'm sure there's a lot of things they could do.

IN REPLY REFER TO

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

TAKE PRIDE IN AMERICA

July 6, 2005

ER 05/498

Craig Wallwork, Project Manager
Armed Forces Retirement Home
3700 North Capitol St., NW
Washington, DC 20011

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS)for the Armed Forces Retirement Home - Washington Master Plan (AFRH-W), dated May 2005. Please give the following comments, offered pursuant to our special expertise, careful consideration in completing the Final Environmental Impact Statement (FEIS).

The DEIS inadequately describes the anticipated effect of the proposed action, namely the significant loss of open space in the largely developed area of Washington DC. The simple statement in Section 1.3 that the AFRH is a 272-acre underdeveloped site does not begin to recognize its traditional value as open space to the community at large. In addition, the financial needs of the AFRH that have stimulated this proposal are not quantified. Beyond stating the need for increased funds, there is no indication of how much of the facility must be converted to revenue generating development in order to sustain the facility. Without such information, we believe the master plan lacks a sound basis for decision making. #49

Section 1.5 Background should acknowledge the importance of the AFRH-W in the history of the design of the City of Washington. It is notable that the setting and planning of the AFRH-W has been of concern and assigned importance for well over one-hundred years. The presence of the "Soldiers Home" at the time of the development of the "MacMillan Plan" in 1902 underscores the dependence upon this parklike setting to continue in a vein similar to the parkland of Rock Creek. It appears to have been the status of The Soldiers Home as a continuing stable presence that allowed the area between Rock Creek and the Anacostia River to retain or create few park, open space and recreation areas in Northeast Washington. Portions of the proposed Master Plan suggested for development would severely reduce the contribution that the current facility now makes and should make to the park and open space component of the Nation's Capital. #52

The Department believes there is a need to develop an alternative that specifically addresses the park and open space value and contribution to the City as a whole. In our #135

judgment, the areas identified as 5 and 6 should be considered critical components of an overall park, open space, and landscape component of this retirement home and the city as well. To allow these two areas to be developed for either housing or for embassies would excessively hem in the current and future use of the golf course and ponds to a point that their future would be threatened. We recommend that a new alternative be developed which would create a public park including the golf course. In order to relieve AFRH-W from the maintenance costs, consideration should also be given to transferring the new park to the District of Columbia or the National Park Service for management. #135

We do not agree that the Development Design and the Site landscaping should depend upon decisions by the developer(s) and are beyond the scope of the FEIS. The AFRH-W presents special and unique values to the overall setting of the Nations Capital in that it provides viewpoints from which the National Capital can be seen, as well as having a significant presence when viewed from many locations. Thus, we believe that the FEIS should define specific building height limits and levels of mature tree growth preservation. Certainly the indication of the general extent of development and landscaping of the area should be envisioned in the FEIS in order to indicate the scope of impacts and extent of mitigation necessary. #188

Please contact David Murphy, National Park Service, National Capital Region at (202) 619-7405 for questions or further coordination related to these comments. Thank you for the opportunity to review the DEIS.

Sincerely,

Michael T. Chezik

Michael T. Chezik
Regional Environmental Officer

cc:
D. Murphy, NPS-NCR, Washington, D.C.

OEPC redraft 7/6/05

potomac conservancy

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5 July 2005

Donald Dailey
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

RE: Draft Environmental Impact Statement for Proposed Redevelopment of AFRH-W

Dear Mr. Dailey:

The Potomac Conservancy, a regional non-profit organization dedicated to protecting the Potomac River and its surrounding areas, appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) concerning the Armed Forces Retirement Home in Washington, DC (AFRH-W). The Potomac Conservancy is concerned about the short and long-term environmental degradation that would result from the proposed development of AFRH-W land. We submit the following suggestions for your consideration:

The Potomac Conservancy recommends consideration of additional alternatives that incorporate a mix of uses, public open space, and historic preservation.

The Potomac Conservancy advocates a mixed-use development that provides some community open space, particularly saving the community garden. This proposal would mitigate the environmental impacts from the DEIS alternatives. Each of the alternatives proposed in the DEIS evokes serious questions of environmental degradation. The destruction of open space in an urban setting creates numerous problems. First, the addition of impervious surfaces will create increased run-off and lead to the degradation of the fish ponds, and channeled streams. The streams and runoff eventually add to the overall decline in our major waterways such as the Potomac River and Chesapeake Bay. #121 #177

Second, the proposed development adds to the problem of poor air quality in the metropolitan area. The proposal will add 3,000 to 5,000 additional vehicles in the morning and evening commutes. The increase in vehicles adds to the already poor quality of air in the region through emission of pollutants. Traffic and parking is already a problem in this area. The stationary sources proposed to the land on AFRH-W will also increase levels of pollutants emitted into the air. #247

Third, the development of a historically open space will change the character of the community and degrade the environment. The meadow, pastures, and community garden will be destroyed to create a glut of buildings and parking lots. These open areas are a link to the subsistence history of AFRH. The current residents enjoy the walkways and vistas of greenery. Removal of mature trees will undermine the park-like atmosphere of the land. #217

Finally, the sale of the land to developers would be a quick fix to a long-term problem. The sale is a one-time event and may not solve AFRH-W's financial difficulties. A more sustainable long-term solution needs to be addressed. The environmental, cultural, and historic #122

negative impacts resulting from development of the land outweigh the sale and the resulting cash inflow to AFRH-W. #122

The Potomac Conservancy strongly suggests that the AFRH-W consider other alternatives to the sale or lease of the land to developers in order to create a more long-term, environmentally-sound, sustainable solution to the economic difficulties. #144

We question why other alternatives to land development are not seriously analyzed in the DEIS, instead of merely being included in a quick paragraph mentioning other suggested sources of income. These alternatives do not appear to be fully analyzed. For example, creating an urban parkland would offer residents and the public a respite from the congestion of the metropolitan area. The unique historical nature of AFRH-W and its monuments would draw citizens to the area. The federal land converted to open space would then be available to the general public. The residents of AFRH-W would also receive physical and mental benefits by use of the open space. The retention of open space would also maintain the scenic viewsheds of the historical buildings and the greenspace for the residents and neighbors. Organizations abound who can aid AFRH-W in creating an urban park. #120

The Potomac Conservancy recommends, in any case, that mitigation and conservation efforts be implemented to preserve the environmental integrity of the area.

In order to mitigate the environmental impacts of the current and proposed development, modern techniques need to be implemented. For example, reduction of impervious surfaces will decrease the amount of polluted runoff. In addition, incorporating rain gardens will filter the polluted runoff from current impervious surfaces which will then help to protect the quality of the fish ponds and channeled streams. Retention of mature trees will improve air quality and protect local fauna. (And also be consistent with the National Capitol Planning Commission's program to protect older growth trees and overall vegetation). Reducing fertilizer and pesticides and only adding these chemicals at certain times on the golf course will ensure increased water quality. The utilization of green building techniques such as green rooftops will help to mitigate other negative effects occurring from development. In general, there are an abundance of common sense, environmentally-sound methods to be implemented in order to ensure the natural integrity of AFRH-W. Creating an model environmentally-healthy redevelopment will demonstrate what a sustainable, low-impact, in-fill development can be. #167

In conclusion, the Potomac Conservancy recommends the AFRH-W reconsider its limited choice of alternatives and analyze other more environmentally-sound and less controversial options. The AFRH-W has a wonderful opportunity to become self-sustaining while also creating a lasting natural haven for the residents and the public. We appreciate your consideration of these recommendations and the Potomac Conservancy would be happy to answer any questions relating to these suggestions.

Sincerely,

Meredith Lathbury
Vice President of Conservation,
General Counsel

NCPC

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Mayor's Appointees

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Ex Officio Members

Secretary of Defense
The Honorable Donald H. Rumsfeld

Secretary of the Interior
The Honorable Gale A. Norton

Administrator
General Services Administration
The Honorable Stephen A. Perry

Chairman
Committee on Governmental Affairs
United States Senate
The Honorable Susan M. Collins

Chairman
Committee on Government Reform
U.S. House of Representatives
The Honorable Tom Davis

Mayor
District of Columbia
The Honorable Anthony A. Williams

Chairman
Council of the District of Columbia
The Honorable Linda W. Cropp

Executive Director

[illegible]

IN REPLY REFER TO:
NCPC File No. MP60

JUL 0 7 2005

Mr. Craig Wallwork
Project Manager
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011-8400

Dear Mr. Wallwork:

Thank you for the opportunity to participate in the review of the Draft Environmental Impact Statement (DEIS) concerning proposed new master plan for the redevelopment of the Armed Forces Retirement Home-Washington (AFRH-W). The DEIS is being prepared, as a federal regulation requirement, on the whole of the existing facility, including all of its various structures, and contains the identified federal Historic District located there. These DEIS comments focus to the Commission's role as the central planning agency for the federal government in the National Capital Region and express our general views on planning and environmental issues.

The Commission anticipates that the master plan effort will create a desirable facility environment and location that attracts uses compatible to the existing surrounding residential neighborhoods and which should add to the economic vitality of the District of Columbia. Most important, the purpose of the proposed action is to create a master plan for the AFRH-W that will sustain the facility and its primary source of funding, the AFRH Trust Fund for continued operation of the AFRH-W. With this primary objective in mind, the Commission staff review of the DEIS finds either alternative 3A or 3B appear to best achieve that objective while still maintaining significant and important qualities of the existing facility campus. #140

However, the staff review notes four areas of master plan evaluation that require additional focus and clarity regard implementation through completed environmental review and master plan guideline development.

The DEIS notes that additional site development at the AFRH-W under the master plan alternatives would increase energy demands and air pollutants emitted by on-site facilities required to provide the operational energy. According to *The Master Plan, Steam System Evaluation* (February 2005), approximately 50 percent of the existing AFRH-W boiler system capacity is available to accommodate the increased demand; however, it would be insufficient to serve the needs of all of the development proposed under any master plan. Therefore modifications to the system, primarily increased boiler capacity, would be required. The resulting necessary boiler capacity revisions indicate that the annual potential to emit (PTE) NOx emissions estimated for all the alternatives would exceed the annual de minimus NOx threshold of 25 tons per year. In accordance with the federal General Conformity Rule, if the direct and indirect emissions of a criteria pollutant (or its precursors) are above the *de minimus* level, AFRH would have to prepare a formal general conformity determination for that pollutant. This requirement should be specified and further details provided within the final NEPA determination of the AFRH-W final decision on master plan development.

As discussed under the master plan alternatives, a majority of the study intersections are expected to operate at LOS E or better. Alternative 2 adds significantly more traffic to the study area roadways as compared to Alternatives 3A, 3B, or 4. Consequently under Alternatives 3A, 3B and 4 less delay is added to the study area intersections. However, Commission staff notes that intersections of North Capitol Street/Harwood Road and Irving Street/1st St NW/Site access are expected to operate at LOS F during both the AM and PM peak hours. Staff emphasizes that the Commission would expect, as part of the final decision determination under NEPA, that the AFRH-W will further elaborate and specify necessary binding guidelines for any development agreement which would require a developer to prepare a transportation management plan detailing strategies to reduce single occupancy vehicle use and that also would, if necessary, physically improve the above noted intersections or their signalization.

NCPC staff stresses that the substantial removal of vegetation in any proposed plan would not be supported by the Comprehensive Plan objectives of the new policies of the Commission. We strongly request that a final NEPA determination specify additional guidelines toward specific mitigation efforts under the guidance of a prepared tree and open space conservation plan regarding access roadway alignments, maintaining open space, and integration of public space with development areas. Green space preservation should be maintained within every development zone of the plan as a component of its development. Specifically NCPC notes that the National Capital Comprehensive Plan policies strongly

emphasize the preservation and maintenance of open space for the AFRH reservation at page 104 of the Plan.

NCPC staff supports the initial historic preservation and cultural resource review within the DEIS and believes its imperative that the guideline objectives maintain the full support of the District of Columbia Historic Preservation Officer (DCHPO) to address the issues noted in the NEPA review. Particularly, NCPC staff emphasizes that all eight character areas of the AFRH-W Historic District could be directly affected by the master plan implementation. The 272 acres of the AFRH-W, part of the AFRH W since 1873, would potentially be affected by the construction of new buildings and would be reduced in size by the private development of some areas of the AFRH-W. Cultural landscape features such as roads, paths, tree lines, and streams could be disrupted or lost entirely. New construction could significantly alter the historic context of individual buildings and building groups, and could obscure the relationship between buildings. In the context of viewshed analysis, views to and from the site as well as views through the site should be fully evaluated. Staff re-emphasizes that a fully evaluated and consulted programmatic agreement developed under Section 106 of the National Historic Preservation Act (NHPA) must be carried forward by the AFRH-W to address these important and adverse effects to the significant AFRH-W District.

Additional issues of the Section 106 process must include the U.S. Soldiers' and Airmen's Home National Historic Landmark (NHL) and National Register-listed Historic District and the President Lincoln and Soldiers' Home National Monument. The National Historic Landmark and Historic District could be affected by new construction in Zones 1 and 2, and possibly by new construction in Zones 3, 4 and 5 of the master plan. Other adjacent historic resources, such as the National Register-listed properties that include the Adams Memorial, the Rock Creek Church Yard and Cemetery, and Saint Paul's Episcopal Church and other potentially eligible properties, might also be affected by the master plan development. The eligibility of properties described as potentially eligible in the draft should be resolved through consultation with the DCSHPO before the final document is released.

NCPC asks to participate in the Section 106 consultation leading to the development of the programmatic agreement. NCPC concurs with the objective of completing development guidelines within the agreement consistent with the Secretary of Interior's Standards for avoidance and minimization of effects to historic resources. NCPC staff also emphasizes that provisions of Section 110 of the Act apply to the master plan undertaking.

Your consideration of our comments at this stage of the environmental review is most timely and I look forward to examining the final EIS when available. Please place the Commission on the distribution list for all further environmental considerations of the AFRH-W master plan. If you have technical questions concerning the information related in this letter, you may contact Eugene Keller or Nancy Witherell, in the Office of Urban Design and Plans Review, at (202) 482-7251 or 482-7239, respectively.

Sincerely,

Patricia E. Gallagher, AICP
Executive Director

THE ARMED FORCES RETIREMENT HOME MASTER PLAN COMMITTEE

COMMENTS RELATING TO DRAFT EMVORONMENTAL IMPACT STATEMENT SUBMITTED 24 JUNE 2005

Chapter 1, page 1-1, 1.1 Introduction

. . . Proposed Master Plan for its campus. . .

QUESTION: When will the Master Plan for the campus be available for review?

Note: There is a legitimate question which may be raised concerning the integrity and validity of the EIS "to analyze the potential impacts from the proposed Master Plan" without full knowledge of the contents of the Master Plan.

Chapter 1, page 1-3, 1.4 Project Objectives

Preserve and improve the essential components . . .

QUESTION: Is there any construction, improvements, modifications, etc. contemplated or contained within the Master Plan for any area not currently designated within a zone? #90

Note: There is no mention in the document relating to the environmental impact on any of these areas.

Example: Part of the Golf course is within zone 4. To maintain the credibility of a golf course requires a minimum of nine holes. If the credibility of the golf course is to be retained, where will the two dislocated holes be moved and what will be the environmental impact of this construction.

Chapter 1, page 1-3, 1.4, Project Objectives

To understand the "essential components of the AFRH-W" it is necessary to have available a listing of these essential components of the AFRH-W. #51

QUESTION: In detail, what are the essential components?

Chapter 1, page 1-9, 1.9.1 Impact on Security and Safety of Residents

The issue of maintaining the security and safety of the AFRH-W resident community pre construction, construction and post construction is not discussed within the current draft of the EIS. #1

QUESTION: How will this issue be addressed and/or mitigated?

Chapter 1, page 1-12, Site Landscaping

" . .depend on decisions by the developer(s) and is beyond the scope of this EIS".

QUESTION: Should there be a system in place assuring that any "decision" by the developer maintains the visual esthetics philosophy or concept of the AFRH-W? #64

Note: This question relates to one of the stated objectives of the EIS (pg 1-3) "Preserve and improve the essential components of the AFRH-w for the residents and the community.

Chapter 2, page 2-3, figure 2-1

QUESTION: Why is the Sheridan Building included in Development Zone 1? #125

Chapter 2, page 2-4, Zone 1

Zone 1 is designated for institutional uses compatible with the AFRH-W operations. . . . #126

QUESTION: In detail please define and explain the institutional uses?

Chapter 2, page 2-18 Economy, Employment, and Income

Under the column Master Plan Alternatives the first paragraph appears to be in error. #145

QUESTION: If this paragraph is not in error, what is the rationale supporting the statement?

Chapter 2, page 2-19, Historic Properties

Under the heading Master Plan Alternatives the indication is that the alternatives 2 thru 4 will have direct long term adverse impacts. The properties and structures contained within the confines of the AFRH-W have a broad and resonating effect on and from the military customs, traditions and culture. #146

QUESTION: What specific reuse is planned within the Master Plan? What mitigation measures are possible to preserve the historic culture of the AFRH-W for future military generations?

Chapter 2, page 2-20, Air Quality

Under the Master Plan alternatives discuss causes of both long term and short term adverse impacts to air quality.

QUESTION: What mitigating measures and/or contingency plans are in place to cope with AFRH-W residents who currently have respiratory problems? What system will be in place to measure the net result of this adverse impact on the incidences of respiratory ailments (i.e. COPD) on AFRH-W residents?

#147

Chapter 3, page 3-11, Table 3-2

On page 3-9 first paragraph "The AFRH-W is located within Census Tract 23.02" There should be sufficient demographic data available at AFRH-W to treat the population as a separate entity for the purposes of this study.

QUESTION: (1) How would the same data (i.e. Population, Race, Median Household Income, Poverty Status) appear if AFRH-W was displayed separately as a separate column to facilitate a closer observation of the population most affected by the proposed Master Plan?

(2) Why were the Social Characteristics and Economic Characteristics not included as a distinct table for tract 23.02 (and separately for the AFRH-W) to provide a more complete and accurate picture of the population most affected by the proposed Master Plan?

#152

Chapter 3, Page 3-52,53, Noise

The last paragraph describes the "land uses near the AFRH" as Category B. Category B is described as "moderately sensitive land uses, including residents, churches and hospitals". This EIS has given no consideration to the environmental consequences on the specific AFRH-W population whose average age is 77 years and who reside in an assisted care and long term care nursing home environment. #156

QUESTION: What would be the Noise Level Results (Table 3-10) if the area within the parameters of the AFRH-W were designated as Activity Category A rather than Category B which is the current category assignment for the "land uses near the AFRH-W".

Chapter 4, Environmental Consequences

The discussion under the various sub headings within Chapter 4 presents a multitude of mitigation measures. #160

QUESTION: Will the mitigation measures presented in the final copy of the EIS be a required part of any contract entered into with a developer to construct any or all of the planned development zone sites under the Master Plan?

QUESTION: Will the mitigation measures presented in the final copy of the EIS be a required part of the final copy of the Master Plan for the AFRH-W?

Chapter 4, Page 4-18, Social Environment

Within Section 4.2 Social Environment the only consideration is given to Population and Housing with no mention of the Social or Economic Characteristics outlined in the Fact Sheet for Census Tract 23.02 (that tract in which the AFRH-W is located). Reference to Question (2) under Chapter 3, Page 3-11. #189

QUESTION: Why is no consideration given to the consequences of the proposed alternatives on the social environment and the Social and Economic Characteristics of the "Ground Zero" impact area of the alternatives (Sheridan and Scott buildings at the AFRH-W)?

Chapter 4, page4-19 first paragraph

Under the alternatives there is a potential increase in population to approximately 7500 persons. #161

QUESTION: With this extreme in population, as well as the interim increase in the worker population during any construction period, what specific security measures are to be taken to protect the environment?

Chapter 4, page 4-35, Character Areas

All eight character areas obscure historic views and open spaces from within the AFRH-W. The sequestered golf course is almost the only open space and cannot be seen from off the compound. #86

QUESTION: What are the possible ways to consider expanding the open space areas within the EIS span of control.

Chapter 4, page 4-35, Character Area 3: Chapel Woods

It is logical to assume that with spills of oil, gas, etc. the Auto Craft Shop has experienced some soil contamination. A stated objective of the AFRH-W Master Plan is "Preserve and improve the essential components of the AFRH-W for the residents and the community". If the Auto Craft Shop falls within the definition of "essential components of the AFRH-W" then it is logical to expect that the shop will be relocated to another area within AFRH-W. #218

QUESTION: What specific measures will be taken to ensure that soil contamination is eliminated at the new location?. Where within the master plan is the designated location of the relocated Auto Craft Shop? Where will the Motor Homes, Campers and other large vehicles associated with the Auto Craft Shop be relocated?

Chapter 4, page 4-36, Character Area 8: Modern Impact Area

QUESTION: Where in the Master Plan is the designated area for the driving range?

Chapter 4, Page 4-39, 4.4 Transportation

QUESTION: Does the data in tables 4-10 through 4-16 accurately reflect a twelve month period as opposed to reflecting only the specific period of the actual measurements which were taken at the specified times? #220

QUESTION: Do the vehicle trips discussed under each alternative accurately reflect the 17,000 additional vehicles referred to elsewhere in the EIS?

Chapter 4, page 4-62, Noise Proposed Action Alternatives 2, 3A, 3B, and 4

QUESTION: What are the specific plans to protect AFRH-W residents from short and long range noise pollution? #248

Parking

QUESTION: What will be the environmental impact when all parking spaces located within the development zones currently reserved for residents, employees and visitors are removed from their current location and moved to a new location? #221

QUESTION: Where and where will the parking facilities be relocated and what will be the environmental impact of this relocation?

Land Use

QUESTION: After scoping, might modified alternative plans be formulated to develop fewer zones, in the event that overall adverse effects of developing all zones are too severe? #87

Cummulative Impact

"Cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. #162

QUESTION: Will the final copy of the EIS address the issue of cumulative impact of the Master Plan on the immediate confines of the AFRH-W community?

QUESTION: What specific base line data will be used or established against which to measure effects of any cummulative impact on the immediate environment and the cultural impact on the resident community? #163

Cultural Impact Assessment

When economic, social and natural or physical environments are interrelated then the EIS will discuss all these effects on the human environment. The Master Plan will definitely have an impact on the human environment within the AFRH-W. #164

QUESTION: In what section of the EIS will the Cultural Impact Assessment be completed and included as a part of the final copy of the EIS?

QUESTION: What will be the specific measures included within the EIS to evaluate the cultural impact within the AFRH-W resident community.

King Health Center

In several areas within the EIS the KHC is referred to as a hospital. #2

Question: Will consideration of KHC as a health center rather than as a hospital have any impact on the final Environmental Consequences contained within the EIS?

Military Requirements

The uniquely strategic location of the AFRH-W on secure government property serves as a military and Homeland Security vantage point as a point of protection for the Capitol of the United States. The property has been used in the past to station defensive equipment and materials and serve as a landing and staging area. #89

QUESTION: What has been the response of the appropriate Defense Department agencies to the potential loss of ability to use the AFRH-W for purposes of national defense?

Lincoln Cottage

QUESTION: What initiatives are in place or planned to accommodate vehicle traffic and parking when the Lincoln Cottage is open to the public? #222

QUESTION: What initiatives are in place or planned to control visitor access to the AFRH-W grounds? #165

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

7-5-05

Mr. Craig Wallwork, Project Manager
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

Re: Armed Forces Retirement Home - Washington Master Plan (CEQ # 20050199)

Dear Mr. Wallwork:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Armed Forces Retirement Home in Washington, D.C. As a result of this review, EPA has assigned this DEIS a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information.

EPA understands that the purpose of the proposed project at the Armed Forces Retirement Home-Washington (AFRH-W) is to create a master plan that will sustain the AFRH-W and its Trust Fund which is its primary source of funding. As stated within the DEIS (page i), AFRH and the U.S. Congress have identified the need for revenue which could be created by development of the AFRH-W. Also noted in the DEIS is that "Private or governmental development on the AFRH-W would occur primarily through leases or sales. The decision to lease or sell will be made based on economic analysis, and is not part of this EIS."

General

Although EPA recognizes the purpose and need for the proposed project, it is not certain that the extensive degree of development proposed is justified as current use and projected future use of the property is not included in the DEIS. The DEIS states that the "site is currently underutilized" but does not provide an analysis of the possible reasons for this other than the presumed assumption that there is undeveloped open space that can be developed to support community needs/amenities as well as provide revenue. It is not apparent that the residents were polled to determine what their needs are as well as if there is the demand to occupy the site with residents and tenants to support residential/hotel/medical/institutional/retail, etc. development that is proposed. Also, aside from the Grant Building and the King Hospital Complex, it is not certain whether other existing buildings would benefit from renovation/demolition, etc. which

may then help to support and increase revenue. An assessment and inventory of existing buildings as well as their uses would provide a baseline and may serve to decrease the build alternatives which would reduce environmental and cultural resource impacts.

To have a better understanding of the potential environmental impacts that may result from the proposed alternatives, EPA has the following comments which we would like to see addressed in the Final Environmental Impact Statement (FEIS).

Cultural Resources

As indicated in the DEIS, the AFRH-W is a National Register-Eligible Historic District. The master plan alternatives would have direct, long-term, major, adverse impacts to cultural resources and the historic district. The pristine areas that characterize the AFRH-W area and that are associated with and represent historical significance will be lost due to the proposed development. Additionally, new construction would likely alter the historic context of individual buildings and building groups. Cultural landscape features would be disrupted or lost entirely. #154

In addition, the proposed alternatives could potentially affect historic properties outside of the AFRH-W. The historic properties outside of the AFRH-W are discussed within the DEIS. However, a map depicting their location in relation to the AFRH-W would be helpful in determining their proximity to cultural resources within the AFRH-W site.

Although a Programmatic Agreement is being developed that will identify mitigation measures as well as design guidelines for the defined character areas, the loss of cultural areas is great and permanent. The DEIS does not propose scaling down the proposed developed areas to retain some (or all) of the intact character areas nor to preserve the open space/meadows or the historic cultural landscape. Thus, of the alternatives proposed, there is no significant difference in the degree of impact.

Page 3-35, Character Area 5: Pasture, states that "The Pasture represents the natural agricultural landscape that was once vitally important to the self-sustaining farming activities on the site and illustrates the 19th century pastoral appearance of its once active farming lands." Prime and unique farmland impacted by the project should be delineated regardless of the current state of cultivation. These efforts should be coordinated with the National Resources Conservation Service. Impacts to prime and unique farmland should be avoided. However, if this is not possible, the FEIS should explain the implications of developing the prime and unique agricultural land with respect to the Farmland Protection Policy Act as well as describe the mitigation measures for those impacts.

Stormwater Management/Wetlands

Page 3-3 of the Wetlands Section states that the largest drainage area on the AFRH-W, approximately 105 acres, drains into two ponds in the southwest corner of the site via a paved flume. The second largest drainage area, approximately 65 acres, flows north to south through the center of the campus via a paved flume and storm sewers. "Prior to any disturbance of these areas, a Jurisdictional Determination (JD) from the USACE would be needed to determine if these features are considered waters of the U.S. and therfore under the USACE's jurisdiction." #149

Page 4-10 states that "Where possible, the open channel systems on the AFRH-W campus should be utilized to alleviate additional loads on the combined sanitary/stormwater sewer system." #174 However, jurisdiction determination of the channel systems may prevent utilization as a stormwater management system.

It is the recommendation of the EPA to discourage the utilization of non-tidal wetland systems for stormwater treatment and management. Numerous studies have shown that siting these facilities in wetlands leads to the degration of aquatic ecosystems by contributing to thermal pollution and downstream warming. Furthermore, an in-stream stormwater management and water quality treatment facility will alter hydrology, and increase erosion and sedimentation rates. Retaining stormwater and changing the natural flow rate will alter the natural level of the water table and change the surrounding wetlands vegetation. Water temperature, habitat composition, and food availability are all directly affected when streamside vegetation is lost. Stormwater management structures in wetlands will not prevent pollutants such as fertilizers, pesticides, spills, sediment, and urban contaminants such as bacteria, heavy metals and petroleum from automotive activities, from entering the surface waters since the structures are already in the surface water. Wetlands are important components to the aquatic ecosystem that provide flood flow desynchronization, maintenance of water quality, habitat and nutrient uptake functions. EPA's mandates include the preservation of these environmentally significant values and functions.

Low Impact Development

Page 4-13 states, "The stormwater storage requirement for the site can be satisfied with stormwater management ponds, underground storage pipes or concrete structures built in conjunction with quality control structures, or a variety of urban Best Management Practices (BMPs)." #175 Although low impact best management practices such as bioretention facilities, infiltration trenches, dry wells, and rock trench level spreaders are proposed to reduce the effects of stormwater, it is important to note that stormwater ponds and other stormwater facilities do not replicate natural systems, which greatly slow water before it reaches streams, wetlands and other waters. Development results in the loss of trees and other vegetation, the compaction of soils by heavy equipment and the creation of vast stretches of connected impervious areas. These combined factors are extremely difficult to compensate for using traditional practices. Prior to the development of any structural stormwater practices on a site, significant reductions in stormwater quantity and quality impacts can be made through enhancements to site design.

As s

result, site design goals and planning practices should be used to minimize stormwater impacts. The following web sites will provide you with goals and practices and additional information: http://www.epa.gov/owow/nps/lid_hydr.pdf; http://www.epa.gov/owow/nps/lidnatl/pdf; http://www.bmpdatabas.org; http://www.txnpsbook.org/; http://www.epa.gov/edocnrl/.

Terrestrial Biota

The DEIS states that portions of forested areas, mature trees, and meadow habitats would be replaced with developed areas. The FEIS should provide a complete description of the terrestrial habitat resources in the study area. Complete species lists for mammals, birds, amphibians, reptiles, and plants present in the study area should be provided. The composition and characteristics of each community type should be summarized and the functions and total acreage indicated. In addition, the species should be mapped relative to habitat locations and species density. #150

To determine the baseline value of the habitat and the severity of the potential impacts from the proposed project, EPA recommends that a baseline Habitat Evaluation Procedure (HEP) be completed on the study area using the U.S. Fish and Wildlife Services's Habitat Evaluation Procedure. If the impacts of the wildlife and terrestrial habitat are unavoidable, the HEP will help to determine the type of mitigation measures which would be considered appropriate for the potential impacts. #182

Measures to avoid potential adverse impacts to these resources should be evaluated and implementation and mitigation plans to minimize impacts should be developed. Where such impacts cannot be avoided, adequate compensation developed through habitat assessment must be implemented.

Aquatic Biota

Although it was noted on page 3-7 that crappie, bass, and catfish are species found in the two fishing ponds, the fish and benthic invertebrates in the ponds within the study area should be surveyed. An analysis of both fish and benthic communities should be conducted to determine the quality and function of the aquatic biota. The purpose of the survey is: 1) to detect impairment of aquatic biota, 2) to assess the relative severity of the impairment, 3) to prioritize sites for more intensive evaluations, and 4) to define baseline conditions and documenting recovery from impairment following mitigation actions. #151

The loss of forested areas and open spaces combined with an increase in impervious surfaces lends itself to more pollutants entering the ponds. Reduced nutrients to streams, affects food supply for fish, etc. Therefore, specific mitigation measures must be outlined to alleviate adverse effects to the aquatic biota present in the ponds.

Thank you for the opportunity to review and comment on this project. If you need additional assistance, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

/S/

William Arguto
NEPA Team Leader

Enclosure

NATIONAL TRUST
for HISTORIC PRESERVATION

July 6, 2005

BY E-MAIL AND FAX: (202) 730-3335

Mr. Donald Dailey
Armed Forces Retirement Home
3700 N. Capitol St. NW
Washington, DC 20011-8400

Re: Armed Forces Retirement Home – Washington Master Plan for Development
Comments on Draft Environmental Impact Statement

Dear Mr. Dailey:

The National Trust for Historic Preservation in the United States (the "National Trust") appreciates the opportunity to comment on the draft Environmental Impact Statement (DEIS) for the proposed Master Plan for Development at the Armed Forces Retirement Home. We hope the following comments will assist the Armed Forces Retirement Home in strengthening the DEIS with regard to historic resources.

The National Trust is a congressionally-chartered nonprofit organization with approximately 270,000 members nationwide, seven regional offices and 26 historic sites open to the public. The National Trust and the Armed Forces Retirement Home (AFRH) have a special relationship regarding the President Lincoln and Soldiers' Home National Monument, which consists of 2.3 acres within the AFRH campus. The National Monument includes the historic Lincoln Cottage, where President Lincoln spent fourteen months during the critical years of the Civil War. The National Trust and the Armed Forces Retirement Home entered into a cooperative agreement to enable the National Trust to research and restore the Lincoln Cottage and to interpret the Cottage for the public. Together we celebrated the completion of the exterior restoration of the Lincoln Cottage earlier this year. All plans for the restoration of the Lincoln Cottage and for the program of public visitation have been and will continue to be developed in close cooperation with the Armed Forces Retirement Home and the District of Columbia Historic Preservation Office (DCHPO).

The National Trust applauds the commitment by AFRH to promote and support the National Monument in the midst of its campus and to make this nationally significant historic site available to the public. The National Trust also recognizes the critical need for AFRH to generate revenue to support the goal of resident-focused care and to rebuild the AFRH Trust Fund, thereby allowing the AFRH to perform its primary mission. Therefore, we support the

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concept of meeting these fiscal and planning goals through compatible new income-generating uses of the AFRH campus.

As steward of the President Lincoln and Soldiers' Home National Monument, the National Trust is deeply interested in the future of the Armed Forces Retirement Home, particularly as the future Master Plan may affect the historic character of the President Lincoln and Soldiers' Home National Monument. The future of the National Monument is inextricably intertwined with that of the Armed Forces Retirement Home. As indicated in the DEIS, the Home's historic resources include a wide variety of historic structures, significant viewsheds and historic landscapes. While the National Monument includes only the Lincoln Cottage (President Lincoln's seasonal retreat) and the surrounding 2.3 acres, the National Monument is also included within a larger National Historic Landmark District, and the whole 272-acre AFRH campus is eligible for the National Register of Historic Places, with 122 contributing resources. The entire historic district is integral to the Monument's historic context and interpretation.

It is important to keep in mind that strict federal stewardship responsibilities apply to nationally significant historic properties such as these. For example, Section 110(f) of the National Historic Preservation Act (NHPA) requires that all federal agencies, prior to approving any action that may directly and adversely affect a National Historic Landmark (NHL), must undertake, "to the maximum extent possible," such "planning and actions as may be necessary to minimize harm" to the NHL. 16 U.S.C. § 470h-2(f). In addition, Section 110(a) of the Act requires that federal agencies manage and maintain the historic properties under their jurisdiction or control in a manner that gives "special consideration to the preservation of [their historic, archaeological, architectural, and cultural] values," for properties such as the AFRH campus, which have national significance. *Id.* § 470h-2(a)(2)(B).

The National Trust is concerned by the potential for development within the AFRH campus to adversely affect historic resources at AFRH. As indicated in the DEIS, many of the existing buildings and developments on the AFRH campus that diminish its overall historic and natural characteristics are the result of master plans that were developed in 1947 and in 1953. DEIS at 3-36. Given the Home's past history of development, we request that the AFRH pursue the following actions before finalizing the Environmental Impact Statement:

- Identify and assess development alternatives that promote less density and disruption
- Disclose in full potential impacts to historic resources; and
- Assess and publicize all available mitigation to minimize destruction of historic resources.

The DEIS acknowledges that each of the proposed Master Plan alternatives (excluding the No Action Alternative) will have "direct, long-term, major, adverse" impacts on the Home's historic resources. DEIS at vii, and 4-34 to 4-35. Perhaps the most substantial impact on historic resources, including the National Monument, will be the result of the scale, height, and density of the new construction. The magnitude of the development proposed in the Draft EIS ranges from a total of 6.055 million square feet, at the minimum, to a maximum total of 8.745 million

#211

square feet, located in 6 identified zones. As indicated in the DEIS, this level of development would change the setting and views from the National Monument, the National Historic Landmark and National Register-listed portions of the campus; would result in the loss of National Register-eligible cultural landscapes; and would alter the historic context of buildings and obscure the relationship between the buildings and the landscape. Anyone who has visited the site is keenly aware of the importance of the views from the Home toward Washington's monumental center, including views of the United States Capitol Building and the Washington Monument. These same views undoubtedly inspired President Lincoln as they continue to inspire and renew the residents of the Armed Forces Retirement Home and visitors to the Lincoln Cottage today. #211

The National Trust is particularly concerned about the limited range of alternatives explored in the DEIS. Because of the potential impacts that would occur as a result of the high level of development currently proposed in the DEIS alternatives, we strongly urge the AFRH to develop additional alternatives that would involve less construction in order to reduce the adverse impacts on historic resources, as required by 36 C.F.R. §§ 800.6(a) and 800.1(a). For example, using Figure 4-1 as a starting point, DEIS at 4-37, we recommend developing alternatives that would reduce the overlap between Development Zones and Intact Character Areas. Alternatively, mitigation measures (not spelled out in the DEIS) should ensure that development within the Intact Character Areas be limited to adaptive reuse of historic structures and that any new construction be strictly compatible with the contributing properties in the historic district. #114 #212

Another concern with the DEIS is the limited extent to which it explores the potential mitigation of the adverse impacts on historic resources. The DEIS indicates that AFRH has initiated consultation with the DCHPO as required pursuant to section 106 of the National Historic Preservation Act, and that a programmatic agreement is being developed to identify mitigation measures, including preservation design guidelines to be incorporated into the final Master Plan. The National Trust submitted a request to be a consulting party in the section 106 process in September 2004. The National Trust strongly encourages AFRH to consult with DCHPO and other consulting and interested parties concerning the development of those mitigation measures prior to finalizing the EIS, so that the mitigation measures can be disclosed through the EIS process.

The National Trust also encourages the AFRH to revise the DEIS to explore and disclose the cumulative impacts of the proposed Master Plan alternatives on historic resources. Currently, the DEIS simply indicates that the alternatives would result in "long-term, major, adverse, cumulative impacts" on historic resources, DEIS at 4-39, but it does not analyze or explore what those cumulative impacts are, nor whether they could be minimized or mitigated. In order to determine whether such cumulative impacts can be avoided or mitigated, it is essential that these impacts be explored and disclosed in the EIS. This discussion will be particularly helpful in the section 106 consultation process, and will assist in the development of alternatives or modifications to the project that will avoid or mitigate adverse effects, as required under 36 C.F.R. § 800.6(a). #213

The National Trust commends AFRH for its continuing commitment to protecting the integrity of the campus historic core. At the same time, the National Trust requests that the AFRH proceed with great sensitivity when changing the nature of the historic treasure represented by the entire campus. A master plan that balances the needs of the AFRH with the property's natural beauty and unique historic value has the best chance for being a model of smart development, and will ensure that the quality of life for the residents of the campus is maintained.

In addition, as the AFRH proceeds in the master planning process, the National Trust would be pleased to lend technical advice on matters of historic preservation, as staff time permits. The National Trust has extensive experience with historic preservation standards, laws, and compliance, as well as a long history of participating in master planning processes. As a consulting party, we wish to be an asset to the master plan development.

The National Trust is privileged to enjoy a productive collaboration with the Armed Forces Retirement Home. We look forward to continuing to work with AFRH in the preservation of the significant historic resources of the Armed Forces Retirement Home. Thank you for your consideration.

Sincerely,

Thompson M. Mayes

Thompson M. Mayes
Deputy General Counsel

cc: Timothy Cox
Richard Moe
Lisa Burcham, SHPO
Tim Denee, DCHPO

COUNCIL OF THE DISTRICT OF COLUMBIA
THE JOHN A. WILSON BUILDING
1350 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004

Armed Forces Retirement Home Statement
District of Columbia Councilmember Adrian M. Fenty, Ward 4
June 22, 2005

Good evening. My name is Adrian Fenty, District of Columbia Councilmember representing Ward 4. I appreciate the opportunity to testify on the proposed future development at the Armed Forces Retirement Home - Washington. Upon reviewing the Draft Environmental Impact Statement and discussing the proposed development with community leaders in the surrounding neighborhoods, it is clear to me that any development of the campus of the Armed Forces Retirement Home will have a large impact on the communities around the site, especially those in Ward 4. #197

As you are aware, there are a number of very active community groups which have weighed in on this proposed development, and since the likely footprint of this development is so large (perhaps as large as over 8 million square feet), it is imperative to continue to not only welcome community input, but ensure the comments and concerns of those affected are incorporated into the final version of the Environmental Impact Study, and ultimately, the Master Plan for the project. #56 I am particularly concerned about the possible impact the new development may have on traffic flow in concert with our existing infrastructure, and the historic preservation issues associated with the property. Development of this property provides a rare opportunity to create and make available open park space for community use, and it could influence the economy by incorporating retail and affordable housing units in the Master Plan. #197

I therefore firmly believe that any successful development project at the Armed Forces Retirement Home hinges on buy-in from the surrounding communities. I look forward to working with all parties to facilitate this involvement and to ensure the formation of a true partnership as this very important project moves forward. Thank you very much, and I would be happy to answer any questions you may have.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
HISTORIC PRESERVATION OFFICE
OFFICE OF PLANNING

July 5, 2005

Craig Wallwork
Armed Forces Retirement Home
3700 North Capitol Street
Box 1303
Washington, DC 20011-8400

Dear Mr. Wallwork:

The comments below are in regard to the April 2005 draft Master Plan for the Armed Forces Retirement Home (AFRH) and the related draft Environmental Impact Statement (EIS). (Page references below are to the draft Master Plan.)

The State Historic Preservation Officer acknowledges that both documents characterize the full implemention of any of the Master Plan Alternatives as having "direct, long-term, major, adverse [effects] on the AFRH-W Historic District," plus "indirect, long-term, adverse [effects]" on the President Lincoln and Soldiers' Home National Monument and the United States Soldiers' and Airmen's Home National Historic Landmark. We understand that Hector Abreu of the Advisory Council on Historic Preservation has reviewed the Master Plan draft. Assuming that the Advisory Council will continue consultation to resolve (avoid, minimize and/or mitigate) adverse effects on historic properties, we would advise you to contact potential consulting parties, including at least the National Park Service, the National Trust for Historic Preservation, the District of Columbia Preservation League, the Committee of One Hundred on the Federal City, the Advisory Neighborhood Commissions and civic associations for the neighborhoods surrounding AFRH, the United States Commission of Fine Arts, the District of Columbia Office of Planning, the National Capital Planning Commission, and any other groups who may request party status.

While we appreciate the candor of the general determination of effects, there is relatively little analysis of what the particular effects might be. With the exception of the "Urban Design Framework Diagram" on page 22 of the Master Plan—which shows that nearly all of the identified primary views would be adversely affected—there is no attempt to relate the plan to the previous surveys of cultural resources. There is no examination of which buildings might be demolished or expanded. The figures for new floor area are proposed *in addition to* the existing contributing and non-contributing structures, but it is not clear how the new construction would occur in relation to the old. Such analysis is expected in an EIS, and some proposed mitigation of adverse impacts would be appropriate. A finding of "long-term, major effects" is, in a sense, facile because it does not state any probable effects in particular. We refer you to Hector Abreu's comments on the Master Plan sent to Gary Porter on June 27, especially reuse and prioritization analysis of the sort he suggests in his point #13 and better graphic representation of

#205

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what build-out might look like as suggested in points #8 and #9 (or as rendered in an axonometric massing model of the campus which would include both building bulk and parking facilities). In doing so, the Character Area Guidelines (pages 30-33) should be applied. Acknowledging significant adverse effects appears to be directly contrary to the Master Plan's first objective: "Maximize development on the AFRH-W *while maintaining the historic character of the site* and retaining significant existing open space." And "significant existing open space" is ambiguous in that it might suggest simply the preservation of "significant" *amounts* of open space as opposed to the preservation of *significant* open *spaces*. #205

Our greatest concern about the draft Master Plan is the bulk proposed. The AFRH has had a low-density campus character since its founding in the mid nineteenth century. The campus is *presently* a "garden in the city," as characterized on page 20 of the Master Plan; at best, the Design Framework proposes to create instead a "city in the garden." The development proposed is of greater scale than what exists around the AFRH, and the development zones have the potential to exceed the density of the surrounding rowhouse neighborhoods (the highest-density alternative could, if spread over the entire campus, nearly cover the entire property one story deep—but each of the options concentrates the vast majority of the built area on substantially less than half of the property, with heights up to ten stories, or perhaps twelve or thirteen—see page 27). #206

The Master Plan repeats the idea that the AFRH represents the transition between the residential uses to the west and southwest and the institutional uses to the east and southeast. It may be fruitful to compare the AFRH with a neighboring institutional campus, the Catholic University of America. Leaving aside the 49 acres of the former Harewood estate recently transferred from AFRH to Catholic (because nothing has yet been built upon it), the university campus totals less than 144 acres in area, compared with AFRH's 272 acres. Catholic is considered a fairly densely developed campus. The campus presently (as of the 2002 campus plan) has 2,325,367 total square feet of built area. At 0.37 FAR, this is significantly denser than AFRH, and in the absence of any historic preservation regulation of the campus, whatever historic landscapes and vistas that might have once existed at Catholic have since been reduced to the green lawns surrounding the buildings. The exception is the playing fields at the north end of the campus which are analogous to the golf course that would be retained at AFRH. If this same level of density were applied to the larger AFRH campus, it would total less than 4.4 million square feet—or millions of square feet less than AFRH intends *to add* under any scenario—with similar, if not more dramatic consequences to the landscape and historic structures. The proposed density for AFRH ranges from 0.63 to 0.85 FAR overall, but it would be concentrated in certain areas. And these figures do not necessarily account for the additional area required for parking; Catholic now accommodates 1,939 spaces, whereas the AFRH Master Plan calls for 7,500 to 16,000. #203

The Design Framework is, frankly, contradictory on the intended character of the campus. It points out an opportunity to reinforce the "sharp contrast" between the edges of the proposed "urban" construction and the remaining open landscape ("one becomes a backdrop for the other")—then twice states that there is no need or desire for "a hard urban edge," and yet suggests how "an urban edge in a landscape could be addressed." With regard to protecting the setting of the significant buildings and the overall character of the property, the Design #204

Framework is absolutely correct in stating that "buildings should be subtly integrated into the existing landscape." It is difficult to imagine, however, how an additional six to eight million square feet of construction, expressed as buildings ranging from four to ten stories in height, can be accommodated subtly. The plan proposes more than quadrupling, if not more than sextupling, the present built area. This seems more along the lines of the "staggering mass" of large buildings added in accordance with the 1947 and 1953 master plans—resulting in the demolition of historic buildings and the interruption of views and axial relationships, but fortunately never completely realized (see page 18). It is clear that at some point a balance between open space retention—as both historic landscapes and as bucolic setting for the buildings—and the built area itself will reach an unfortunate tipping point. We fear that, instead of subtly inserting buildings into the landscape, what is proposed is essentially to shrink the campus and build around it something that is very different in character. The possible parcelization shown on page 27 imperils a substantial portion of the Chapel Woods, as well as the formerly cultivated area (Character Area 7) located along Rock Creek Church Road and serving as a buffer to the neighborhood to the west. While in form, the built environment might relate to the remaining large pieces of open space in the manner suggested by the photograph of the very urban Park Square Gardens, London on page 20, the new development would mostly be segregated from such spaces by the proposed new security perimeter. #204

Naturally, security measures will be another issue. The nature of a campus is in the relationships that exist between buildings and landscapes. Views and passage through the landscape are very important to the character of campuses and to this very historic one. Creating a new fence line across the campus will adversely affect these aspects. The Character Area Guidelines take a good initial stab at this problem. #207

Despite the bulk proposed, the proposed uses and the general development zone locations are likely workable. But the fact that the EIS alternatives range from a no-build option to options in excess of six million square feet of new construction suggests that there are alternatives in between—and consideration of *all* alternatives to avoid or minimize adverse effects is the intent of Section 106. #100

We look forward to future consultation through the Section 106 process and strongly encourage additional development of alternatives that will minimize adverse effects.

Sincerely,

Lisa Burcham

Lisa Burcham
State Historic Preservation Officer

GOVERNMENT OF THE DISTRICT OF COLUMBIA
FIRE AND EMERGENCY MEDICAL SERVICES DEPARTMENT
WASHINGTON, D C 20001

July 5, 2005

Mr. Craig Wallwork
Project Manager
Armed Forces Retirement Home
3700 North Capital Street NW
Washington, DC 20011

Dear Sir:

Based upon a review of the document submitted by you to the DC Fire and EMS Department's Office of the Fire Marshal in relation to the environmental impact statement of the proposed master plan for the Armed Forces Retirement Home, the following comments are being brought forth.

The contents of this plan will have an impact on the DC Fire and EMS Department. However, the impact amounts to the normal daily operating practices that are already set in place by the department. Basically, your plan is proposing to sell or lease the land that the AFRH currently occupies for future urban development purposes. #195

This will offer more potential building structures that the DC Fire and EMS Department will be responsible for in the area of incident mitigation, emergency response, and fire inspections.

Understanding the fact that the city is on an upward growth path, this proposal renders minimal impact to the fire service as long as all structures and occupancies are erected according to the current codes and standards set forth by the District of Columbia, especially in the area of fire department access, fire detection and suppression systems, and emergency planning.

Sincerely,

Richard Fleming
Fire Marshal, A/DFC

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

★ ★ ★

[redacted]

Office of the Director

June 24, 2005

Mr. Craig Wallwork
Project Manager
Armed Forces Retirement Home
3700 North Capitol Street NW
Washington, D.C. 20011-8400

RE: Draft Environment Impact Statement for Armed Forces Retirement Home Master Plan

Dear Mr. Wallwork:

The District of Columbia Department of Housing and Community Development (DHCD) is providing these comments in response to your letter of May 13, 2005 on the Draft Environmental Impact Statement for the Armed Forces Retirement Home (AFRH) Master Plan. DHCD has completed its review of the Draft Environmental Impact Statement and has the following comments to offer regarding the four proposed Master Plan development alternatives presented and analyzed:

1. DHCD understands the need of the AFRH to create a development Master Plan that will be used to sustain the AFRH in the long-term, by replenishing its primary source of operational funding, the AFRH Trust Fund. You propose to accomplish this with revenue derived from the sale or lease of surplus parcels of land on the AFRH North Capitol Street Campus. We note that Congress has authorized, as part of the National Defense Authorization Act for Fiscal Year 2002, the AFRH to sell or lease any property excess to its needs, with the approval of the Secretary of Defense, for the specific purpose of replenishing the AFRH Trust Fund. #8
2. DHCD applauds and supports the AFRH for developing a Master Plan concept framework that has identified six zones of surplus land around the perimeter of the AFRH Campus that can be developed without compromising the historic l landmark character of the historic core of the Campus.
3. DHCD supports the development of infill institutional uses that will be compatible with current AFRH operations located in the designated Zone 1 development area. This specific proposal is common to all four Master Plan development alternatives presented.

4. Dense new institutional and commercial uses that generate a great deal of traffic should be concentrated and focused in Development Zone 3 established in the Master Plan. North Capitol Street and the existing North Capitol Street entrance have more capacity to be able to accommodate the traffic that these new institutional/commercial uses will generate. #127

5. Development of proposed new medical uses should be concentrated on the Development Zone 4 located on Irving Street directly adjacent to the existing hospital complexes located south of Irving Street NW. Traffic generated from these new medical uses should enter at a new entrance located at the existing First Street and Irving Street intersection that currently serves traffic from the hospital complexes south of Irving Street.

6. Residential uses of a scale compatible with the low-rise townhouse development in the adjacent Park Place and Petworth neighborhoods should be located in the Development Zones 5 and 6 identified in the Master Plan. The existing Park Place and Rock Creek Church Road streets are both rather narrow and small scale streets. The traffic generated by new townhouse scale residential development can be more easily handled on Park Place and Rock Creek Church Road as they are presently configured. #131

7. Maximum use should be made of environmentally sensitive "green" building and site design strategies (such as permeable parking lot paving and green building roofs) in order to minimize the increase in the amount of new impervious pavement and building tops generated by proposed development in the six development zones of the Master Plan. #180

8 Particular attention should be paid to the details of the residential developments to be constructed around (to the north and south of) the two large fishing ponds located at Park Place and Irving in the southwest corner of the Campus. These two ponds have some of the most intact undisturbed landscaping on the entire AFRH Campus. The existing landscaped character of these ponds should be respected and preserved to the maximum extent possible by the new residential developments that will be built next to them. #132

Please contact Mr. James Thackaberry, Project Manager in the Development Finance Division, at (202) 442-7141 if you have any questions regarding these comments.

Sincerely,

Jamil Greene
Director

cc: Mr. Timothy Cox, Chief Operating Officer

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING

Office of the Director

July 6, 2005

Mr. Craig Wallwork
Project Manager
Armed Forces Retirement Home
3700 North Capitol Street, N.W.
Washington, D.C. 20011

Dear Mr. Wallwork:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Armed Forces Retirement Home-Washington (AFRH-W). This letter provides coordinated comments from District of Columbia government agencies, including the Office of the Deputy Mayor for Planning and Economic Development, Department of Health, and Office of Planning. Generally, the District government understands the constraints and needs of the Armed Forces Retirement Home (AFRH) to creatively generate alternative revenue to continuously renew its budget to support ongoing operations. The District offers the following comments on the Draft EIS as categorized below:

Development Process and Community Engagement

A major suggestion is that the process for including the District government and the general public, particularly the surrounding neighborhoods, should be clearly outlined and adopted for the entire process. Both the District government and surrounding neighborhoods should be afforded ample opportunity to determine how the programmatic targets for each development scenario and any sufficient alterations are massed on the site and respond to concerns/requirements related to historic preservation, adaptive reuse of existing structures, open space, transportation and economic impacts. It has been the District's experience that community charrettes (workshops) are an effective way to allow residents and other stakeholders to participate and help shape outcomes of planning/development processes. #55

Revitalization/Economic Development

District revitalization/economic development priorities within the area include: 1) Georgia Avenue/Great Street land assemblage, retail improvement/attraction and redevelopment; 2) McMillan Sand Filtration Site redevelopment potential, and 3) cumulatively, the impact of all proposed area development on the transportation, traffic, transit and parking networks. #199

Additionally, the planning/development goals of the McMillan Sand Filtration site can be applied to the AFRH site. These include: 1) providing publicly accessible recreation/open space; 2) preserving and adaptively reuse of site features; 3) creative development of the site, such as incorporating historic features, civic elements, and green buildings; 4) mitigating neighborhood impacts; and 5) maximizing revenue-producing opportunities on both private and non-profit components of the site. #7

Impact on Public Infrastructure/Services

The impact of future development on surrounding neighborhoods and District facilities is of utmost concern. Cumulative impacts of all proposed development on the surround area should be adequately addressed. Impact analyses should be conducted for transportation, traffic, transit and parking networks, as well as libraries, schools, recreation centers and other services. #166

Zoning

As the site development process progresses, more information should be provided regarding development areas that will be leased and/or sold for private development. The land areas sold to private developers will be subject to the Districts land use and zoning regulations. #200

Environmental Health

The mitigation measures outlined in the Draft EIS report address both the short- and long-term impacts of the increased stormwater runoff that would be generated as a result of increased imperviousness from the development. In particular, we strongly support implementation of the low impact development (LID) practices such as bio-retention, infiltration trenches (where the soils are suitable), dry wells, rock trench level spreaders, and vegetative controls outlined in the report. However, in addition to the above list of best management practices, we recommend that the developers also look into the feasibility of green roofs because of the numerous environmental benefits that can be achieved from such systems. #179

AFRH-W, has considerable issues with regard to hazardous waste and corollary contamination. First and foremost, the AFRH-W currently does not have an operations and maintenance (O & M) program in place to manage wastes and other environmental contaminants. Secondly, it is not currently identified as a RCRA hazardous waste generator in the draft EIS even though EHA has it *listed* with an EPA ID number. #157

Furthermore, the following contaminants or areas of concern have been identified with the past and current operation of the AFRH-W:

- 3 out of service USTs (underground storage tanks)
- 3 abandoned USTs near Buildings 46 and 76
- 3 active USTs associated with Buildings 52, 56, and 64 storing diesel fuel for emergency generators
- Possible perchchloroethylene ground contamination associated with former laundry in Building 46
- Former hazardous materials/petroleum use areas in Buildings 73, 76, and 77
- Surplus pesticides stored in Building 77. Conceivably, DDT and chlordane could be housed there given the age of the units
- Spent solvents, paint thinners, paint waste, drummed lead paint debris, possible hydraulic fluid
- Known asbestos containing materials (ACM) throughout the facility

It is also a distant possibility that, given the opening date of the facility (1851), there could be some ordnance issues. Although AFRH-W is neither a fort, nor lies in the "circle of forts" area that comprise much of the formerly-used defense sites (FUDS), it may still be possible to unearth munitions during any required excavations in addition to medical waste and attendant equipment/supplies/bottles, etc. given its pre- and post-Civil war status. As a result, we recommend that an anecdotal review of requisite documents, photographs, etc. be conducted should a light or heavy geophysical study be contemplated for any ordnance/medical waste debris, etc. #157

The following minor corrections should be made on pages 7-3 and 7-4 of the distribution list: "Mr. Marie Sansome" should be corrected to "Ms. Marie Sansone", and Mr. Denzil Noble is no longer with the Department of Consumer and Regulatory Affairs. We recommend that the changes be reflected in the final EIS.

Additionally, the D.C. State Historic Preservation Office has submitted its comments to you under separate cover, from Lisa Burcham, State Historic Preservation Officer. Again, thank you for the opportunity to comment on the Draft EIS. We look forward to working with you throughout the site development process. Should you have any questions, you may contact Rosalynn Taylor, Associate Director for Neighborhood Planning, at (202) 442-8970 or Derrick Woody, Special Assistant, Office of the Deputy Mayor for Planning and Economic Development, at (202) 727-2981.

Sincerely,

Ellen McCarthy
Director

cc: Stan Jackson, Deputy Mayor, Planning and Economic Development
Derrick Woody, Special Assistant, Office of the Deputy Mayor for Planning and Economic Development
Rosalynn Taylor, Associate Director for Neighborhood Planning
Lisa Burcham, D.C. State Historic Preservation Officer
Marie Sansone, Senior Deputy Director, Environmental Health Administration, Department of Health

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: NATHANIEL M. ADAMS, JR

Address: 4429 GEORGIA AVE, NW; WASH, DC 20011

Affiliation: COMMUNITY RESIDENT

Phone: (H) 202/723-6094 /// (PAGER) 202/336-2064
(FAX) 202/291-4397

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

[X] Yes [redacted]

Comments

- SENIOR CITIZENS WHO NOW TIRE OF CARING FOR REGULAR HOUSES IN D.C. MUST NOW RELOCATE IN MARYLAND OR VIRGINIA FOR "SENIOR COMMUNITIES"
- COULD NOT SOME OF THIS PROPERTY BECOME PROPERTIES FOR "SENIOR COMMUNITY" ESTABLISHMENT, WHEREBY SENIORS WOULD PURCHASE OR LEASE REDUCED-SIZE RESIDENCES

#66

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

First Name: NATHANIEL M

Last Name: ADAMS JR

Phone Number: 202-723-6094

Fax: 202-291-4397

Address 1: 4429 GEORGIA AVENUE NW

Address 2:

City: WASHINGTON

State: DC

Zip Code: 20011

Email Address: colonelnat@juno.com

Comments: Instead of new construction for "condos", why not utilize existing vacant dormitory building and greatly "under-used" dormitories. Contracts could be awarded to reduce each building to bare walls and floors; followed by subsequent complete "up-scale" re-furbishment" to the maximum levels attainable (both interior and exterior). Once down, such apartments could be sold at the highest "market-rates" which are now prevalent. Such an effort would result in the large income levels which you are seeking and should be compatible with the neighborhood complaints. Please advise earliest concerning this idea. #85

Respectfully,
N.M. Adams Jr
LtC USA (Ret)

424 Newton Place Northwest
Washington, DC 20010

Mr. Donald Dailey (donald.dailey@afrh.gov)
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

Re: Response to Draft EIS for AFRH-Washington Plan

July 5, 2005

Dear Mr. Dailey:

Thank you for the opportunity to present my comments on the AFRH Washington Master Plan Draft Environmental Impact Statement (DEIS). My comments on the DEIS are as follows:

1) *In conversation with area residents, many residents and civic organizations were not equitably represented at the past June meeting nor have been provided information about AFRH's plan to develop.*
2) It appears the draft for development does not consider recreation and preservation of potential park land as an option. This includes not serving ample notice to a potential major player such as the District of Columbia Parks and Recreation. In addition, we have been informed that our local office of the National Parks Recreation offices was not served notice. It befuddles me why this area of development has not been considered.
3) During the June public meeting, there was no disclosure of dollar amounts of how much AFRH needs to continue offering veteran home services. Nor is this disclosed in the draft. If you are considering public participation, comments, input, etc, than, certainly this should be a more open process where the residents and concerned parties are informed what are the numbers to be met and propose alternatives. All of our drafted comments are just superfluous until we know how to meet AFRH's needs.
4) What strikes most shocking me most shocking is that these parcels which have historic significance or character, the development plan must spare them from development, possibly including through alternatives such as land trusts or sale of certain parcels, or portions, for use a parkland. Both options should be added as viable alternatives that allow for revenue but also conservation. It appears that if AFRH is not interested in preserving a land which hosts Lincoln's cottage and was the first Soldiers' burial grounds, then, National Parks Service would indeed in preserving a piece of our history.

5) *The very character of a residential neighborhood with existing number of trees is being proposed to be destroyed.* Retention of all of the existing mature trees in the historic character areas are particularly essential for historic-preservation purposes. All development alternatives must be crafted in such a way as to preserve the mature trees.

6) *The proposal of 17,600 in one of the alternatives seems almost preposterous in A RESIDENTIAL NEIGHBORHOOD.* Concrete kingdoms are found all across US urban cities, however, this plan is again not addressing the history, character of the land nor the neighborhood or for that matter, the residents of the home.

7) ***I fully believe that other true alternatives to the proposed development plan must be explored.*** The four "alternatives" listed in the DEIS are not really different from one another, but merely slight variations on a single theme. More effort should be made to provide true alternatives with a variety of financial and real estate options to solve the underlying concern – namely the budget of the AFRH. #92

8) The historical importance of the property and maintaining its coherence is overlooked. There should be more detail regarding Section 106 impacts including consideration of knowledgeable sources on the subject, such as Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation. It appears that the Trust needs to make more input on its significance.

9) *Is AFRH saying that there will be little or no traffic impact on a neighborhood that is mainly Seniors, Children and Families?* 17,600 spaces means a lot of traffic, potentially use of neighboring streets for parking, rezoning, new lights, stop signs, etc. The impact on traffic is vague and unexplored. It requires more details, specifics, and cost information. There is no information about the impact on the community of the number of peak-hour trips suggested in terms of cost to the city of Washington DC to address, the damage to the local infrastructure, and the overall impact on the surrounding community. #223 The transportation impact study of the EIS has not considered the impact of increased traffic on side streets between the affected AFRH property and Georgia and New Hampshire Avenues. The impact of the level of increased traffic considered is unlikely to be limited to the main streets currently studied in the EIS. More specifically, the neighborhoods to the west of the AFRH property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. #224 The EIS has not considered the impact of increased traffic on loss of recreational services provided by streets in Petworth and Park View. In addition, the District of Columbia government has recognized that there is a serious problem with pedestrian deaths from automobiles on city streets. Bringing a large number of automobiles into narrow residential streets will likely increase the mortality rate in the area to the west of AFRH, particularly because of the relatively large number of elderly and children.

10) I am in accordance with your proposed development of zone 6. I have children

(ages 6 and 3) and do not feel that your plan is conducive for the raising of children. Nor am I in agreement to have towering buildings in front of what is a beautiful and scenic area with lagoons, ponds, and horticulture by AFRH's residents. The plan does not take into account that BUILDINGS will hover over what is not row houses. The DEIS mentions any project being in keeping with the neighborhood, but that standard does not actually appear to be consistently applied in the document. That error must be corrected. For example, alternatives 2 and 3A suggest development in Zone 6 that is not at all in keeping with the adjacent neighborhood's architecture. The existing neighborhood is comprised entirely of rowhouse architecture, with a maximum of three stories in height. #129

11) If land is to be developed under "GOV" zoning, then all government building standards must be applied, including the most up-to-date environmental standards. For example, the EIS should detail that any development on GOV-zoned land would have to be GSA LEED certified. #3

12) [redacted] I am sure this plan is one of HUGE displacement and [redacted]. In addition, the meeting in June was demonstrative that AFRH made NO OUTREACH efforts to minority populations. LATINOS were NOT represented nor was communication disseminated in SPANISH nor translation services provided for the meeting. HAD THERE BEEN REPRESENTATION AND COMMUNICATION. *Has your plan taking into account the density of the proposed development is so high that is likely to adversely the health and well-being (physical and material) of these neighbors?* Specifically, the Census tracts adjacent to AFRH on the west have median incomes that place the neighborhood in the lowest 20th percentile for income in the Washington area. These tracts are also 82-90 % African American (compared to 12.4% nationally), with disproportionate percentages of individuals over age 65, below the poverty line, and suffering from disability.

13) It appears AFRH has already proposed developers for these plans (hotel, convention, hospital) without the disclosure of who they are. The only evident party present that probably has bidded under the table is Washington Hospital Center. Do not forget that one of the SENIOR residents REMEMBERS when Washington Hospital Center made many promises to maintain the neighborhood character and did not do so. If you must develop, develop on the Irving and North Capitol sides which do not affect our neighborhoods so heavily. Just how much money does AFRH need?!

14) The proposed development will have disproportionate negative health effects on minority populations. Specifically, air pollution problems are local as well as regional in scope. The nearby neighborhoods would experience the largest change in air quality from the increased traffic and other pollution sources associated with the proposed development. Further, local air pollution is linked to increased incidence of respiratory illness. Three different recent studies being published this month in *Epidemiology* find a significant link between daily ground-level ozone in cities and mortality rates in the next 3 days. Ozone is #192

formed when pollutants, such as car exhaust mix with heat and sunlight. Editors of *Epidemiology* have made the rather unprecedented comment that together these studies point to an "urgent need to reduce public exposure to ambient ozone by all possible means." To that fact must be added that communities of color across the nation are experiencing disproportionately high levels of asthma and other respiratory illness. The deteriorated local air quality will also worsen these health problems in this predominantly African American neighborhood. The heat-retention effect of the loss of current AFRH green space will also promote additional local ground-level ozone formation. Finally, the current mature trees on the AFRH property contribute positively to air quality, particularly in the immediate vicinity of the property. #192 (continued)

15) The EIS does not consider the heat-retention impact that the proposed dramatic replacement of green meadow, lawn and trees with buildings and paved surface will have on temperatures in the surrounding area. The dominant green space on the current AFRH campus has a cooling effect that will be radically altered is heat-retaining buildings, parking lots, and roads are constructed where grass and trees now stand. The increased temperatures will result in higher cooling bills, particularly burdensome for the elderly poor, or an increased frequency of dangerous summer conditions for those who cannot afford air conditioning, again particularly the elderly poor. Increased temperatures will also worsen the impact of the increased automotive exhaust associated with the proposed development by promoting local ground-level ozone formation. At the current time, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality. #173

16) Many residents in the area to the west of AFRH use their basements for living space or rent them out to gain much needed income. AFRH enjoys the physical advantages of being the third highest point in the District of Columbia. The draft EIS has not considered how dense construction on the AFRH property will change the water table and how this might affect basements in the adjacent, lower lying area. A rise in the water table seems likely to result from dense development on this land. A raised water table could result in a serious damage to the use of basements and a substantial loss in income. #176

17) In terms of [redacted], what is proposed to counter the *increased level* of living, retail, and traffic? Crime is inevitable, however, what measures and coordination are being placed by the District Police and Fire Departments. Will neighborhood safety be considered when as it stands, area residents fight crime, theft, burglary, heavy drug trafficking for local streets, Georgia Avenue and surrounding areas?

18) As President Lincoln found this area to be calming so, do the residents of this area. It is particularly notable to walk out in the mornings and the evenings, hear the birds, smell the air and feel the breeze of the trees. Both residents of the AFRH and neighbors who live to the west of the Home benefit, much as President Lincoln did when the Anderson cottage was built, from the relative calm and quiet

provided by the green campus of the Home. The EIS notes that the noise level in the area is that usually found in parks. Area residents enjoy being able to walk past the property and to see it's green expanses when looking out their windows or down their streets. In this way, the AFRH has provided area residents with a real source of wealth that improves their quality of life in ways that they could not purchase no matter what their income was. This neighborhood does not seem poor to its residents no matter their income because it does not look like a poor neighborhood. The increased traffic, noise, and loss of green beauty and calm will take away something of **irreplaceable** value in their lives.

19) Finally, and perhaps most importantly, the DEIS has not adequately taken into account the Federal Elements of the Comprehensive Plan for the National Capital adequately. In particular, there appears to have been an marked inattention to the Parks and Open Element and the Preservation and Historic Features Element. **#198**

The Parks and Open Space Element of the Comprehensive Plan for the National Capital makes clear that the capital area is facing increasing demand for open space and park due to increase population and tourism pressure. The Element defines open space as "any land or water surface that is not occupied by buildings, a broad definition that encompasses the vast majority of federal property" (p. 3). Under the Park and Open Space Element directs that federal agencies should:

1. maintain and conserve federal open space as a means of shaping and enhancing urban areas (p. 7);
2. preserve open space that is crucial to the long-term quality of life of a neighborhood or region;
3. Conserve and maintain the essential open space character of areas in the region with significant park, open space cultural or natural qualities that contribute to the setting of the National Capital Region." The Element specifically includes McMillan Reservoir to the immediate south of Zone 5 as an example.
4. "Conserve portions of military reservations that add significantly to the inventory of park, open space, and natural areas and should, to the extent practicable be used by the public for recreation … [i.e.,] when *security* considerations permit (p. 8-9)." The Element *explicitly includes U.S. Soldier's and Airmen's Home* as an example of this.
5. "Maintain and conserve trees and other vegetation in the landscaped buffer areas on federal installations in a natural condition."

The Park and Open Space Element also stresses the importance of connectivity between parks and open spaces in the Capital Region. As already noted, the Element has identified both AFRH and the McMillan Reservoir to its immediate south as areas to be preserved as open space and parkland. Fort Totten to the northeast of AFRH is also an important part of the long-run open space plan for the Capital region. As land is currently configured, links could be made between these three areas through green bikeways. Loss of the AFRH property to development could seriously impair this open space connectivity.

The Parks and Open Space Element highlights the unique role that parks created around

historic sites play in the Capital Region. The federal government is to "establish and preserve historic parks as important legacies of national, historic, architectural and landscape significance. The Anderson cottage and two acres surrounding it have been designated a National Monument because of its importance in Lincoln and other 19th century presidencies. But as the DEIS notes, the importance of the AFRH site does not stop with this. To its immediate north is the first national military cemetery, predating Arlington National Cemetery. The AFRH itself has been in continuous use as a final home for members of the U.S. Armed Services since the middle of the 19th century. It is the U.S. equivalent of Les Invalides in Paris. Its central landscaped core and the agricultural land (now garden) of Zone 6 are essentially unchanged from the 19th century and provide a coherent and important historical context for the National Monument, cemetery and historically important home. The Elements are very clear about the importance of protecting just such landscapes from destruction.

The Parks and Open Space Element of the Federal Plan also commits the federal government to protecting terrain features of the region through careful design. In particular, it notes the importance of maintaining vistas of the Monumental core of L'Enfant's city and protecting the escarpments that provide these overlooks. As the third highest point in the District of Columbia and one of the only undeveloped ones, the AFRH property is one of the areas that falls under the federal government commitment to protect "topographic bowl features."

The Preservation and Historic Features Element of the Comprehensive Plan for the National Capital: Federal Elements complements the Parks and Open Space Element. The Preservation and Historic Features Element is not limited to preservation of historic structures. A major concern is the "preservation and strengthening historic urban design features, such as the L'Enfant Plan." As part of this the Element commits to "protecting the character of the region's natural features, many of which have historical or cultural significance, such as ... *the ridge of the topographic bowl, agricultural land, ... and designed landscapes.*" All of these elements are present on the AFRH property and the alternatives do not seem to adequately take these into account. In particular plans to develop Zones 5 and 6 will disturb historically agricultural land that was an integral part of the function of both AFRH and the Anderson cottage, as well as disrupt the landscape of the topographic bowl. In particular, the Federal Plan calls for the federal government to "protect the skyline formed by the region's natural features, particularly the topographic bowl around central Washington" and to "protect and enhance the vistas and views, both natural and designed that are an integral part of the national capital's image."

The Preservation and Historic Features Federal Elements set policies regarding federal government stewardship of historic properties and the historic plan of Washington, D.C. Under these Elements federal agencies should:

1. protect the settings of historic properties, including views to and from sites where significant, as integral parts of the historic character of the property (p. 8);
2. protect the *reservations that contain historic landscapes and features from incompatible changes or incursion*;

3. protect views .. *inward from vantage points along the rim of the topographic bowl from inappropriate intrusions. Open space should be preserved to allow for public use and enjoyment of these views. (Examples include ...the escarpment north of Florida, Ave. NW)..*

The Parks and Open Space Element of the Comprehensive Plan for the National Capital: Federal Elements directs the federal government to look to redevelopment of surplus federal property as a means of adding to the region's inventory of parks and open space and notes that future acquisitions could occur by purchase, easement, donation or exchange. An alternative that has not been included in the EIS is exchange of land in Zones 5 and 6 for other federal surplus land that could be more appropriately developed. Exchanging this land for land in another location and development there could provide needed financial resources for AFRH. Zones 5 and 6 could then continue to play the important role they currently play in the District's system of federal open space by protecting historic landscapes, providing appropriate context for an important historical site and protecting views of the central core of the capital as directed by the Federal Elements. If the land were transferred to the National Park Service to enlarge the Lincoln Cottage National Monument, this would not only preserve open space but would help protect the historical integrity of the setting for the cottage as a place of retreat and rest, thus preventing the kind of encroachment of inappropriate new development that has so adversely affected the Manassas Battle Field and other major Civil War historic sites. It would also enhance public access to much needed open space in the District as a whole as well as the adjacent neighborhoods. In addition, it may serve to substantially mitigate adverse environmental impacts of development on the eastern Zones 2, 3, and 4.

The District of Columbia Parks and Recreation is currently in the middle of a comprehensive planning process. As part of this effort they are conducting a survey of park and recreation needs indicating a significant deficit of park space in the Petworth, Park View, Columbia Heights area. The AFRH property is a uniquely large landscaped open space – one of the few remaining unprotected open space areas in the eastern part of residential Washington DC. The planning process should also be timed to accommodate consideration of the current comprehensive planning process of the D.C. Department of Parks and Recreation.

The location of a park in Zone 6 in the AFRH EIS would be easily accessible to dense development in neighboring Colombia Heights and to planned dense residential development along Georgia Avenue, as well as dense development planned for the rest of the AFRH site. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northwest and northeast D.C. #94

The open space already provided by AFRH is an integral design element of the adjacent Petworth and Park View row house neighborhoods, developed in the early 1900s. Surrounding streets to the west of the Home were designed to take advantage of vistas of

the open space provided by the Home's property. For example, the vista from Grant Circle down Illinois Ave to Zone 6 is an important anchoring design element in the eastern part of Petworth. The Preservation Element of the Federal Elements direct federal agencies to "protect reciprocal views along rights-of-way and from … circles (p. 11)." Replacing the vista of this green expanse that opens out over a view of the federal core of the city with a view of an eight story apartment building would significant harm the integrity of historic city plan in this part of the capital.

Among the alternatives, the DEIS has not considered alternatives that would provide significant parkland for the neighborhood to the west of AFRH. As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of Soldier's Home were developed in the early 1900s around the presence of the Soldier's Home as open space. #92

Thank you for your consideration of these comments. I am confident that adequate and appropriate consideration of the comments of all affected parties will produce a better end result for AFRH, its residents, and the multitude of other city residents who will be affected by the proposed development.

Sincerely,

Adan and Janet Lugo-Tafur – adantafur@hotmail.com, angelcaramelo@hotmail.com
Adam and Zachary Tafur
Carlos and Sandra Barreto – cbarretostrombone@yahoo.com,
sandrabarreto18@yahoo.com
424 Newton Place Northwest

cc: The Honorable Eleanor Holmes Norton
Councilmember Adrian Fenty
Councilmember Jim Graham
Leslie Schill, Dept of Parks and Recreation

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Kathy Boylan
Address: 503 Rock Creek Church Rd. N.W
Affiliation: Dorothy Day Catholic Worker
Phone: 882-9649

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

We do not want the development.

Fund the Old Soldiers' Home by

1) opening the home to more soldiers especially homeless veterans whose monthly rent would fund the home.
2) Invite not for profit groups serving veterans to take over unused buildings and pay rent
3) Allow U.S. Park Service to take over land for park. Park Service would then pay for mowing + other land, tree + pond care.
4) demand that the Federal Government pay to maintain the Armed Forces Home.
5) Stop the war on Iraq + use the money for funding.

#67

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

#67 (continued)

6) Use the home to serve some of the thousands of seriously wounded soldiers returning from Iraq + Afghanistan

#67 (continued)

Also serve the meds of the many who are returning from war suffering from a mental disorder!

How to fund the Old Soldiers Home

1) - Change requirements to allow homeless veterans - disabled veterans from this war
- be invited to live here
- their monthly ~~ss~~ check could be used to raise $.

#67 (continued)

2) - fund the home by stopping the war - bringing the soldiers home

stop funding Halliburton

3) Walter Reed

- Traffic - 5th & Quincy
Rock Creek

- Serve the needs of the victims of this war
- is their a possibility of Class action suit

- Closing Walter Reed - is that to allow d

#67 (continued)

VETERANS BENEFITS UNDERFUNDED, JOB TRAINING CUT

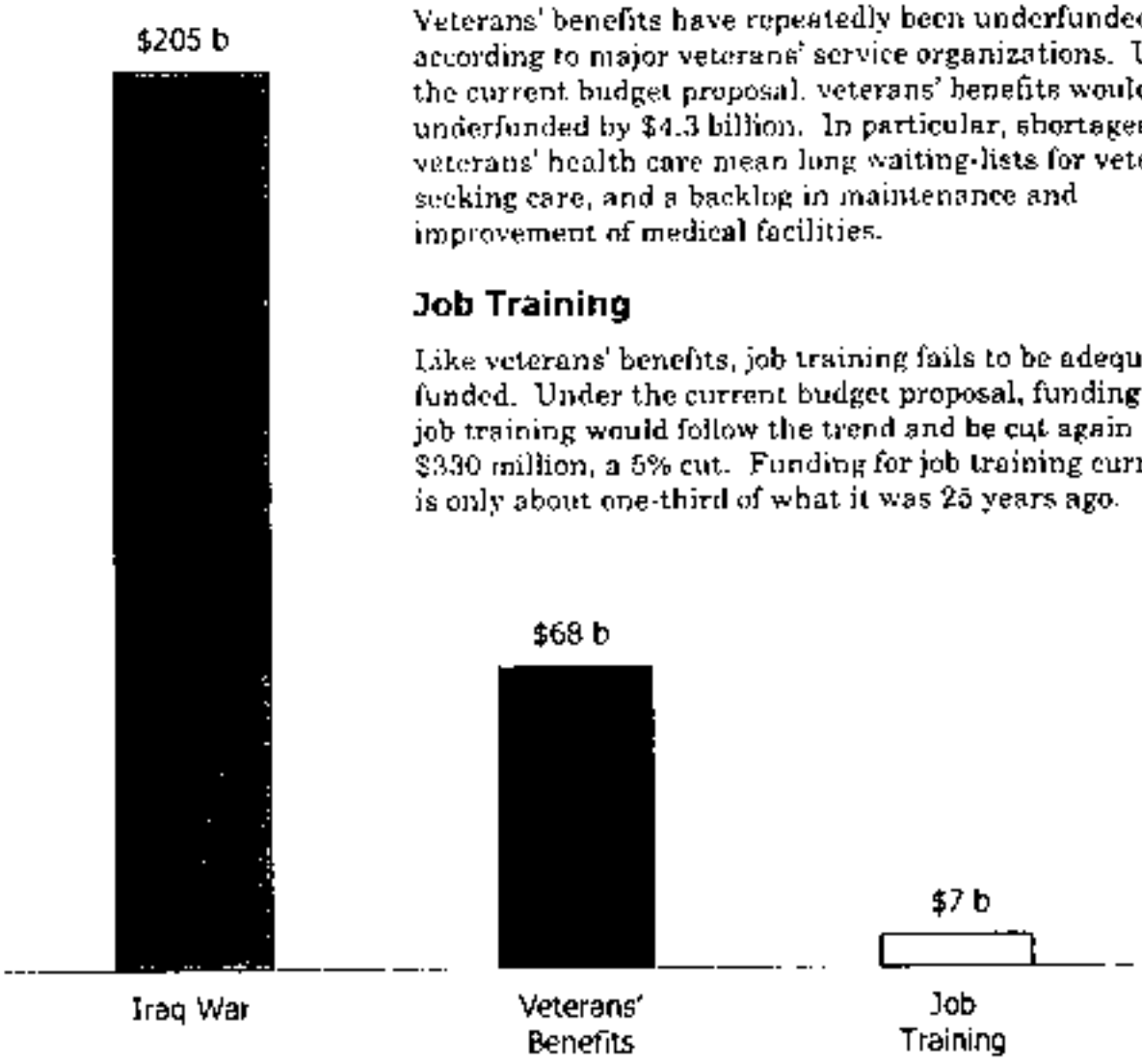
At the same time more money is allocated for the Iraq War, the Bush Administration proposes to underfund veterans benefits by $4.3 billion and cut job training by $330 million.

Veterans' Benefits

Veterans' benefits have repeatedly been underfunded, according to major veterans' service organizations. Under the current budget proposal, veterans' benefits would be underfunded by $4.3 billion. In particular, shortages in veterans' health care mean long waiting-lists for veterans seeking care, and a backlog in maintenance and improvement of medical facilities.

Job Training

Like veterans' benefits, job training fails to be adequately funded. Under the current budget proposal, funding for job training would follow the trend and be cut again by $330 million, a 5% cut. Funding for job training currently is only about one-third of what it was 25 years ago.



Notes: NPP's estimate is based on the four allocations Congress has made which included funding for the Iraq War and represents funding allocated from FY2003–FY2005. Spending on veterans' benefits and job training are for fiscal year 2006 as proposed by the President in the Office of Management and Budget, *Budget of the U.S. Government, FY2006*. For more on veterans' benefits and underfunding, see *FY2006 The Independent Budget* at http://www.pva.org/independentbudget/.

National Priorities Project ◆ 17 New South Street, Suite 302 ◆ Northampton, MA 01060
www.nationalpriorities.org ◆ info@nationalpriorities.org ◆ 413-584-9556

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THE COST OF WAR RISES FOR THE DISTRICT OF COLUMBIA

June 2005

In April, Congress passed another $82 billion worth of war-related spending. About $58 billion of it will fund the Iraq War bringing total spending to $205 billion.

D.C. taxpayers' share for what Congress has allocated for the Iraq War so far is $963.5 million.

With $963.5 million, D.C. could:

- Build 6,606 affordable housing units creating 3,105 new jobs; or
- Hire 18,535 public school teachers; or
- Provide 465,474 students with university scholarships; or
- Hire 17,002 public safety officers; or
- Provide health care coverage to 164,970 uninsured people.

In planning and executing the Iraq War, the administration underestimated the cost. The Director of the Office of Management and Budget stated that the costs would be between $50-$60 billion, and the White House discounted its own economic advisor when he suggested that the war could cost between $100-$200 billion. The cost has now exceeded that sum, and Congress is already considering appropriating another $45 billion for next fiscal year.

The human costs in the District of Columbia are high:

- 3 soldiers killed;
- 8 soldiers wounded.

More than 1,650 U.S. soldiers have been killed and another 12,600 wounded.
One in six returning soldiers may suffer from a mental disorder.
Tens of thousands of Iraqi civilians have died in the war.

Notes: NPP's estimate is based on the four allocations Congress has made which included funding for the Iraq War. State-level taxpayer costs are based on each state's contribution in taxes to the federal funds budget, according to IRS data. Local costs are based on state-level costs and relative size and income-levels of the city or county. Number of teachers and public safety officers are based on state average salaries plus 35% for benefits and are estimated from the 1999 – 2003 editions of the Bureau of Labor Statistics, *Occupational Employment and Wage Estimates*. Affordable housing units are based on state housing values projected from the 1990 and 2000 Censuses and the number of jobs created are recurring (long-term) based on estimates by the National Association of Home Builders. The number of scholarships is based on each state's cost of tuition and fees at the state's flagship university. The cost of health care coverage is based on state averages of Medicaid outlays per person from the *Centers for Medicare and Medicaid Data Compendium*. Number of soldiers killed is from the Iraq Coalition Casualties Count as of June 5, 2005. Number of soldiers wounded is based on Iraq Coalition Casualties Count and the Dept. of Defense Directorate for Information Operations and Reports, Military Casualty Information. Statistic on returning soldiers is from C.W. Hoge et al. 'Combat duty in Iraq and Afghanistan, mental health problems, barriers to care,' *New England Journal of Medicine*, July 1, 2004. For more local information and methodology, see NPP's *Local Cost of Iraq War* at http://nationalpriorities.org/warcosts and the *NPP Domestic Trade-Offs* page at http://nationalpriorities.org/tradeoffs.

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Dear Mr. Dailey,

The following are my comments on the Armed Forces Retirement Home Environmental Impact Statement.

I am a neighbor at the southwest corner of the property, adjacent to proposed development zone 5.

I strongly feel that there are alternatives not yet considered for receiving the finances needed. Other than acquiring funds directly from the US Congress, there are options for retaining greenspace. Please see the http://www.lta.org/conserve/options.htm for information on conservation easements. #95

I am extremely supportive of opening the property for access to the community. The fences and barbed wire around the land is not only unfriendly and and eyesore, it fosters neighborhood discontent. To have this land so close but inaccessible is a huge disservice to the community. #96
Community gardens, playgrounds and walking trails would increase the goodwill between the neighbors and the AFRH.

If development is indeed needed, I would welcome environmentally friendly green buildings with thoughtfulness of the viewsheds and keeping as much open space as possible. #97

I am thoroughly against more medical buildings in zone 5. It would add no needed services to the immediate residential community. #130

If new residences are added, I would strongly advocate for them to be built with a similar design to the current character of the neighborhood and to include some low-impact commerce. While Georgia Avenue is slated for improvement, currently there are few services (shops, restaurants, etc) in the area. #133

Thank you for maintaining community involvement throughout this process.

Rebecca Brown
424 Kenyon St., NW
202-882-5664

AFRH

Protecting a Promise
Renewing the Trust

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name:
Address:
Affiliation:
Phone:

Emil T. Byke
AFRH-W 241
3700 N Capitol St., NW
Washington, DC 20011-8400

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☐ Yes ☐ No

Comments

I attended Mr Cox briefing of the DEIS on June 15. — What I perceived is that Mr Cox main issue is how to increase revenue for the Home Trust Fund — I have two simple solutions which would not cost the Fund ~~to accomplish~~ any deficit

(1) Congress in 1995 passed a bill to increase donations from active duty personnel the sum of fifty (50) to One dollar per month — All need to be done is to have Dept of Defense order it to be —

(2) Trasfer or Lease to the Veterans Administration The King Heath Center specifically the La Garde Building — This Building ~~only~~ cost the Fund approximately 65% of our operating budget —

#68

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: A Campbell

Address: 243 Rock Creek Church Rd, NW, Washington, DC 20011

Affiliation:

Phone:

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

The plan will have a negative impact the area. The environmental impact will increase the air pollution and smog as the green area is reduced. The resident of the District of Columbia has one of the highest rate of child hood asthma in the nation. Likewise, adult population of persons with asthma and other respiratory aliments is above record number. The District was at risk for lossing federal money due to the lack of tree on public spaces. It is also that the extensive development will change and require the road to accommodate the high traffic increase. There could be meeting space, wedding reception and the like can raise substantial monies. I would like to see a plan that is a median between the resident (AFRH + private) and not just in theory.

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: GRACIE W CARPENTER

Address: 3700 N CAPITOL ST NW 1099 WASH DC 20011

Affiliation: HOME RESIDENT

Phone: 202-829-9008 202-365-6847-CELL

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

Some of my additional concerns are attached here.

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

My concerns on the DEIS:

Not one of the proposed alternatives will have a "minor" impact on this area. All changes will be very "major" in affecting AFRH-W, being permanent.

Traffic into and out of AFRH-W will increase tremendously. I don't believe any roads surrounding AFRH-W can carry the additional cars, ie, quantity, size, frequency.

#158

Sound level testing was not done near the Sheridan Building because of ongoing road work on N Capitol Street. I think it still needs to be done because even once construction begins on(hopefully) a parking garage for AFRH-W, the noise level will still be high for those of us who live on that side of AFRH-W.

A sound barrier of some sort would be on order. But instead of constructing concrete, perhaps trees around the perimeter would work towards reducing noise levels, be aesthetically pleasing to look at, and would also help in making air quality better.

Soil erosion is a concern. With the shallow tree root system here, care needs to be taken to perhaps replant trees with stronger root systems, ones that won't blow over with the first strong winds.

Forested areas should only be removed minimally. We have fox and deer on the grounds also. Please leave some areas undisturbed.

Sincerely,

Gracie W Carpenter

GRACIE W. CARPENTER

I.S 1113

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: JAMES CARSTENSEN

Address: 3648 PARK PLACE, NW WASH, DC 20010

Affiliation: NEIGHBOR

Phone: 202-518-8895

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

PLEASE ADD THE ATTACHED AS MY COMMENTS ON THE PLAN

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

My name is James Carstensen. I'm speaking for several people in the Petworth and Park View communities who have taken a great interest in this project. There are likely millions more around the country who would take an interest if they knew more about it.

Let's make one thing clear at the outset. This proceeding, this proposed land lease, is about money. The Armed Forces Retirement Home Trust Fund in recent years has been depleted. The people of the Soldier's Home want a revenue stream, and they deserve one. People who live here served and sacrificed for their country. For those retired service men and women in the room tonight, we thank you. They deserve our applause. This city, this community, this country, must ensure that they continue to get the kind of retirement lifestyle they deserve. We are here to try to make that happen.

Where we stand today is precious ground not only for the Armed Forces Retirement Home, but for the entire community and indeed the nation. Abraham Lincoln spent a quarter of his presidency here. He walked these grounds. He saw graves being dug for Union troops. He shaped his thoughts about the Emancipation Proclamation here. He talked with soldiers. This institution, the Soldier's Home, had the foresight to make sure this historic cottage where Lincoln and his family lived, will be preserved. As early as 2007, the Lincoln National Monument will open its doors to the world.

So why the rush to lease this precious surrounding land for eight-story condos, massive buildings with huge parking lots, and the accompanying traffic and smog? Once the open land is developed, it's gone forever. #4

From Maine to Florida, it would be difficult to find an area more densely developed than the areas East and Southeast of where we are standing today. This is not an area of sprawl. Our forefathers developed the area efficiently, near transportation hubs. In many cases they built homes without backyards. My friends, aren't we packed into this area densely enough? There is little green space left in Washington D.C. There are few areas that resemble the pastures and open space Lincoln saw as he commuted to and from the White House each day.

Why are we in such a rush to put concrete and pavement over this area? Are we doing it for the retired men and women of the Soldier's Home? We think not. We see them gardening and walking on this beautiful open space. One questions whether they are in any rush to see this land disappear.

Is this land being developed for the community? No. There are spaces along Georgia Avenue and structures throughout the area that lie in abandonment. There are many other areas that have long since ceased to be open spaces that need to be redeveloped.

Are we developing this federal land for the nation? Once again, the answer is no. There are untold hundreds of thousands that have not yet discovered Lincoln's Cottage. Nor have they yet found the first Arlington Cemetery behind the cottage, where soldiers

from the First Battle of Bull Run and other conflicts are buried. We should think of the land surrounding these sacred sites no differently than the space around Washington's Mount Vernon or Jefferson's Monticello.

Is there a better way? Yes. There are ways to generate revenue from the land without destroying it. There are ways to get the Armed Forces Retirement Home the money it needs without building upon one of its most precious resources.

Some would have us believe the debate is about whether to erect six-story buildings or four-story buildings; whether to put more condos here, or more convenience stores over there. That is a false debate. The issue is this: We need to make sure the Soldier's Home doesn't fall further into financial neglect. Let's get the Armed Forces Retirement Home the money it needs. But let us not sacrifice one of the Home's greatest assets in pursuing that cause.

We have examined the plan for this land drawn up by a few executives and consultants. We don't see anything in the document that talks about National Parks. We don't see any reference to recreational areas or walking trails. We don't see a discussion of ways to generate revenue from the land without paving it. We don't see talk about the need to preserve open space for the retired soldiers, the entire community and the nation. #98

What we see is a rush to development. My friends, this issue is far too important to take the expedient way out. If we do, our grandchildren will never see the land as Lincoln saw it.

There is a better way. Working together we can do the right thing, not only for ourselves and our community, but for the entire nation, and all generations to come.

Thank you very much for your time and consideration of our thoughts and views.

James Carstensen
3648 Park Place, NW
Washington, DC 20010
202-518-8895

AFRH

By Hand

Protecting a Promise
Renewing the Trust

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: MARLIN F. COOY, AFRH

Address: 3700 N Capitol St NW - 714

Affiliation: WASH, DC 20011-8700

Phone: (202) 291-4421 MFCOOY3@YAHOO.COM

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

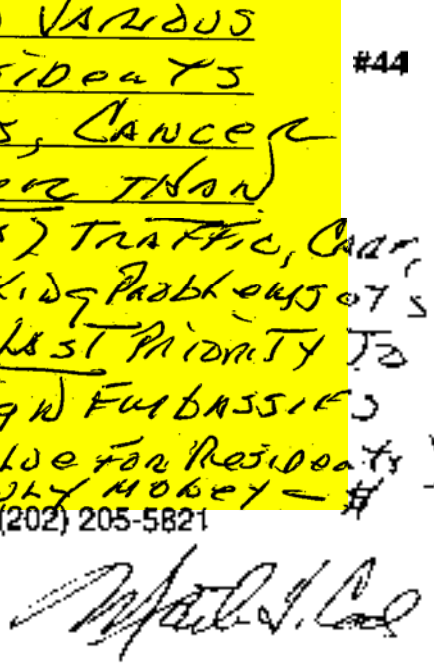
(1) ADD: SECTION ON RESIDENT IMPACT "FROM REDUCED WALKING AREA, GRASS, FLOWERS, GARDEN ELIMINATION & CONSTRUCTION DUST, NOISE OF EQUIPMENT, TRAFFIC CO2 ETC. #159

(2) SOMEWHERE IN INTRODUCTION STATE WHAT THIS EIS DOES NOT INCLUDE, (A) NO ECONOMICS OF VARIOUS OPTIONS & ALTERNATIVES AND (B) NO INPUT FROM THE "MASTER PLAN" WITH ITS GOALS ON ALTERNATIVES (C) NO PRIORITIES ARE GIVEN TO VARIOUS OPTIONS AS BENEFITING THE RESIDENTS EG. HOSPITALS, MEDICAL SCHOOLS, CANCER RESEARCH CTR/CLINICS ARE BETTER THAN RESIDENTIAL UNITS (4200 HOMES/APTS) TRAFFIC, CAR PARKING PROBLEMS ETC AND LAST PRIORITY TO FOREIGN EMBASSIES (NO VALUE FOR RESIDENTS — ONLY MONEY —) #44

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821



To Whom It May Concern,

1. The AFRH needs to seriously and substantially incorporate neighborhood concerns into any development plans. Not just lip service, a pat on the head, and checking 'get community input' off the to-do list. #54

2. Any development should strive to preserve a reasonable amount of managed green space that is accessible to the public. #99

3. Any development should be guided by firm, well-articulated guidelines mandating exceptionally high architectural quality, design/aesthetics, balance of uses, and good integration into existing neighborhood fabric. Especially in parcel 6 in areas adjacent to residential Petworth and Park View. If profit for the Home is the sole motivation and the highest bidder wins, we could end up with clumsy, ugly, ill-conceived projects that will potentially degrade - rather than enhance - the greater community. #6

Best regards,

Bill Crandall
Publisher, Petworth News
www.petworthnews.com
petworth@mac.com

Donald Dailey
AFRH
3700 N Capitol St., NW
Washington, DC 20011-8400

June 15, 2005

Please consider the following comments relating to the Draft EIS and the Master Plan for the Armed Forces Retirement Home. The pages cited are listed, in my opinion, according to the relativity to Armed Forces Retirement Home Residents and not in numerical sequence.

4-26 *The AFRH-W is zoned GOV, Government and therefore is not subject to local zoning regulations unless portions of the site are sold to private parties. Implementation of the AFRH-W's Master Plan would result in a considerable change to zoning on the site if segments of the AFRH-W are sold. If the land for development were leased, it would not be subject to zoning.*

#31

Based on the statement that leased land is not subject to zoning because the AFRH-W is Government, this exemption, when applied to Home Residents, has a positive effect because Home Residents will be exempt from DC control and may keep the domicile of their choice. This will allow residents to vote for their Representatives and Senators. A domicile in a "No State Tax State" will have a positive effect on our Home Residents.

4-30 *In addition, the presence of the AFRH in the City would bring the benefit of tax revenue from any resident employee, as well as local commercial entities that do business with the AFRH.*

"resident employee." If the employee is a resident of DC and employed at AFRH, yes, they should pay DC taxes. But, if it means a Home Resident employee working in AFRH, that creates an issue. Present policy does not provide for Home Residents to work for a salary at AFRH. No effect on the social status of AFRH residents.

3-18 *According to the District of Columbia Generalized Land Use Map, land use on the AFRH-W is characterized as "federal," meaning that the land and facilities onsite are occupied by the federal government (DC Office of Planning, 2002).*

A site occupied by the federal government should be considered as a "Federal Instrumentality" and immune from State control. DC has characterized AFRH-W as "federal."

3-23 ***Sales and Use Taxes:*** *The District of Columbia imposes sales and use taxes on the purchase or consumption of tangible personal property or services within the District.*

Sales or use at the AFRH-W are not within the District and taxes should not be collected. This is a positive impact on the social status of Home Residents.

3-24 ***Individual Income Taxes:*** *Individual income taxes are levied on all individuals who are* ***domiciled*** *in the District. (Black's Law Dictionary describes a domicile as the place a person states that it is where he is to live permanently and when he is absent, he will return.) AFRH-W Employees who are residents of the District would pay individual income taxes. (Of course, if they live in the District and work at AFRH-W, they should pay DC taxes.)*

#31 con't

AFRH-W residents may be domiciled in another State. Voting rights are not removed from a resident domiciled in another state and the Income Tax laws of that domiciliary prevail. Full application of 3-24 will have a positive effect on Home Residents.

3-25 *In 1851, the Federal Government purchased farmland surrounding the Cottage to form the historic core of what was called the* 'Military Asylum' (HFH, 2004). *General Scott used some of the $175,000.00 to pay his troops, buy supplies and offered the remainder to Congress to establish the Soldiers Home(ibid).*

US Code, Title 24 Is entitled "Hospitals and Asylums" and the Armed Forces Retirement Home is established under Title 24. In my opinion, being an inmate in the Asylum is not at all bad. We are definitely not under the control of the District of Columbia.

3-29 *The same area was listed in the National Register of Historic Places as a historic district in 1974. The area designated as National Historic Landmark was listed in the National Register of Historic Places as a historic district on February 11, 1974, under the name* "U.S. Soldiers' and Airmen's Home" (EHT Traceries, 2004).

3-31 *In 1988, The District State Historic Preservation Officer (SHPO) determined that the entire 272 acre AFRH-W property is eligible for listing in the National Register as a Historic District.*

The rationale of my comments is to verify that when the final EIS is accepted that Home Residents of AFRH-W will keep their rights to declare a domicile of their choice and enjoy the voting rights and taxing authorities of their choosing. Residing at AFRH-W for medical or whatever reason must not mandate that residents forfeit their hard fought-for privileges and rights. It should be resolved that if Zoning and other various and sundry laws are not enforceable on AFRH-W property, why aren't AFRH-W residents entitled to the same consideration?

Thank you for your consideration.

Robert Devaney
AFRH-W 65
Sheridan 5010
202 829 3681
robert.devaney@verizon.net

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: KATHLEEN DONAHUE

Address: 623 OTIS PL NW, WASHINGTON, DC 20010

Affiliation: RESIDENT, MEMBER OF UNITED NEIGHBORHOOD COALITION

Phone: (202) 722-0002

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

Please see attached letter.

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

KATHLEEN DONAHUE
623 OTIS PL. NW
WASHINGTON, DC 20010
(202)722-0002
KATIE_RED@HOTMAIL.COM

6 July 2005

Donald Daily
Armed Forces Retirement Home
3700 N. Capitol St. NW
Washington, DC 20011

Mr. Daily:

I am writing to provide my comments on the Draft Environmental Impact Study (DEIS) regarding the proposed development at the Armed Forces Retirement Home campus at 3700 North Capitol St. NW, Washington, DC (AFRH-W). I have a number of concerns about the DEIS that I hope will be considered and addressed in the final Environmental Impact Study (EIS).

LACK OF DEVELOPMENT ALTERNATIVES

My first concern is the lack of alternative development plans laid out in Section 2 of the DEIS. Although Alternative 1 is presented with the option of no development, it is clear that this alternative would not meet the AFRH-W's financial needs and is not likely to be a viable option. Alternatives 2 through 4 utilize all of the conceptual development zones (both currently developed and undeveloped), and none of the alternatives considers only partial development of the six zones. Because no financial information is included in the DEIS, it is not clear why *so much* development is required. The final EIS should contain further development alternatives which would have less impact on the surrounding area, or a disclaimer about why less development is not financially feasible for the AFRH. #50

NATURAL RESOURCES

Tables 4-4, 4-5, and 4-6 highlight various issues related to storm water runoff. Unlike table 4-3, no baseline is provided to indicate how the values compare to pre-development levels. Without this information, it is impossible to get a good picture of the real impact the development will have on the watershed. #181

While, Section 4.1.3.1 does address the reduction in green space and wildlife habitat, one major point that is omitted is increase in human/animal contact caused by the reduction in wildlife habitat. For example, there could be an increase in road kill events caused by animals passing out of green space into developed areas. I believe that the impact on terrestrial biota would be higher than stated in the DEIS. #183

SOCIAL ENVIRONMENT

Section 4.2.1 of the DEIS states that affect of the change to the views from the Park View neighborhood would have "long-term, moderate, and adverse from the perspective of those residents who may prefer to look out on open space". As one of those residents, I can attest that the affects of the change in my view would be "severe or highly noticeable"—in other words, major. No mitigation measures are listed in this section; however there are several which even take into account the interests of those neighbors and the AFRH who would prefer to have development in Zone 6. For example, development proposals could require the maintenance of significant green space in this area along with development, so that only some of the traditional views are disrupted. #190

Similarly, no mitigation measures are offered in section 4.2.2, regarding environmental justice. For example, the development could require that some portion of new housing be built for low-income residents. Financing could be provided to aid low-income homeowners in the existing neighborhoods to handle increases in their property taxes resulting from the development. Development proposals could be required to provide access to the development by existing neighbors, so that they are not excluded from enjoying benefits of additional commercial services and parkland.

Also in section 4.2.2, it is noted that transportation, air quality, and noise changes would not disproportionately affect people living in the vicinity of AFRH-W. In this area, many children play outside in the street, rather than in homes or playgrounds. These children *would* be disproportionately affected by these changes, because they would be in the path of the increased transportation, they would be outside in the area with reduced air quality, and the increases in noise, especially during construction, could prevent them from passing on safety information such as "Get out of the street—there's a car coming!"

Finally, section 4.2.2 does not address the increase in temperature which would arise from the reduction in vegetation, increase in impervious surfaces such as blacktop, and additional cars/utilities. If temperatures were to increase just a few degrees in this area, utility costs would skyrocket for low-income families who must use more energy to cool their homes. In addition, increased temperatures could cause a safety hazard for people spending time outside.

CULTURAL RESOURCES

The DEIS addresses the adverse affects of developments on historic viewsheds, the historic cultural landscape, and the historic district. I would like to highlight these points because it cannot be emphasized enough that once a historic place is destroyed, it cannot be replaced and the utmost caution should be used before giving up these historic resources forever. #219

TRANSPORTATION

Although I applaud the realistic DEIS findings that traffic infrastructure in this area would "fail" in some nearby roads, this section is woefully inadequate in addressing the affects of the proposed development on public transportation needs and infrastructure. This topic is not addressed in either section 4.4 or 4.2.3 (Community Facilities and Services). Although many residents of the new development would undoubtedly use automobiles for transportation, many would utilize public transportation. Increased use of nearby Metro stations is not addressed, nor is increased use of the Metrobus system (nor the potential need for additional bus lines to service this area). These changes could be costly and detrimental to current users of these services. Trains and buses could be overcrowded, and increased traffic could slow bus transportation for residents from all over the #227

area who utilize nearby routes. In addition, bicycle transportation is not addressed in the DEIS. As a bike commuter, I can attest that increased traffic on Park Place and Michigan Ave. will significantly increase my level of risk when riding my bicycle to work on those roads. #227 (continued)

AIR QUALITY

Although air quality is addressed in terms of air pollution, the topic of air temperature is not addressed in DEIS. The reduction of green space and increase in heat-reflecting surfaces, automobiles, and utility use (such as air conditioner units), is likely to increase the air temperature in the developed area and its immediate surroundings. This can have dramatic impacts on health, utility use, and safety (especially for elderly persons) for nearby residents. #245

UTILITIES

Although it is noted that WASA would be involved in installing new public water lines and sewer lines, this does not address the existing workload of WASA, (including the replacement of existing lead service lines) that may be detrimentally impacted due to the additional tasks of the proposed development. City residents who are waiting for safe water lines to be installed may be forced to prolong their exposure to unsafe lead levels in their water in order for this development to be completed. #250

CONCLUSION

As noted in Section 4.11, the proposed development plans would have irreversible results, not only for the AFRH, but for the residents of Washington, D.C. and the United States. Serious consideration should be taken before making dramatic changes to this property. Specific actions that should be taken include:

- Consideration of development alternatives with less impact (and less development)
- Concentration on mitigation strategies for all the environmental impacts, prior to beginning development
- Frequent and open communication with AFRH stakeholders, such as AFRH-W residents, neighbors, the city of Washington, Congress, and the citizens of the United States, especially during the Request for Proposal or RFP portion of the project.

Thank you for the opportunity to comment and I look forward to reading the amended EIS and subsequent documentation on this project.

Sincerely,

Kathleen Donahue,
Parkview Neighborhood Resident
Member, United Neighborhood Coalition

Cc:
Jim Graham, Ward 1 Councilmember
Adrian Fenty, Ward 4 Councilmember
Congresswoman Eleanor Holmes Norton

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: David E. Douglas
Address: 3600 Park Pl. N.W.
Affiliation: Neighbor
Phone 202-316 4425

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

Please, Please, be good steward, keep the green space, we need the OXYGEN! #70

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005
For questions on the Draft EIS, please contact Denise Decker (202) 205-5821

June 21, 2005

Mr. Craig Wallwork, Project Manager
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

Dear Mr. Wallwork,

These written comments are in response to the Draft Environmental Impact Statement (Draft EIS) for the AFRH-W Master Plan. As a good neighbor to the AFRH-W, I appreciate the opportunity to provide these comments out of concern for the residents of the AFRH-W, the historic property on which it stands, and the surrounding community.

First of all I would like to honor 1100 men and women who live on the AFRH-W property currently. These men and women served to safeguard our country and paid again out of their military paychecks to support and sustain the home. They continue to pay for it now in resident fees.

I would also like to honor the military personnel who contributed out of their paychecks to support and sustain this home. Although they never realized their investment by residing here, they gave for decades in the faith that it would be here for those who might need it.

I respect the need to raise additional funds to support the AFRH-W now and into the future for our men and women who have served in the US military. I hope that a reasonable solution can be found to deal with this.

The four US Presidents, who used the Anderson Cottage as their Summer White House, should also be honored, including Lincoln who composed the Emancipation Proclamation on this property and spent his last night here. George Washington Riggs, founder of Riggs bank should be remembered as well. He built the "Lincoln Cottage" available to Abraham Lincoln and is now buried in Rock Creek Church Cemetery.

The intent of the 1851 Congress should also be honored, as they established the home for veterans, as should President Millard Fillmore who signed the legislation. Indeed the legacy of the land is mighty and its history belongs to all Americans.

The Draft EIS, which I am responding to, just as it is, shows significant problems with the Master Plan. Impacts of all types are listed as long-term and adverse throughout the document, including the assessment that intersections on North Capitol Street will be inadequate to handle the car volume.

According to the EIS, the most intact area and the one having the most effect on destruction of the Historic District and historic past of the AFRH-W, is on the Western

part of the property. Petworth is 3 stories in height, proposed construction is 6-8 stories in height is out of scale with the surrounding neighborhood. The EIS deems this as having, "long-term, moderate, adverse effect on Petworth and Park View. [EIS 3-38]

It also cites about Community Facilities and Services that an increased number of daytime and evening occupants has the potential to result in more calls for service: Embassies could require additional police presence should demonstrations take place; this represents a, "direct, long-term, minor impact." There is also a "direct, long-term, minor, adverse impact due to an increase in the building density…", "direct, long-term, minor, negative impact on the DCFD EMS department", "direct, long-term, negligible, adverse impact on hospital and hospital personnel in the District.", "direct, long-term, minor, adverse impact on the school system would occur", and "direct, long-term, minor, and adverse impact on the US Postal Service." [EIS 4-23]

As many other problems with the Master Plan are addressed in the EIS, I would like to close this set of concerns with this Summary of the Unavoidable Adverse Impacts:

> "Unavoidable, long-term effects would include construction of new buildings within open space/meadows on the AFRH-W; removal of mature trees; changes in viewsheds for residential areas outside of the AFRH-W; permanent changes in the historic cultural landscape; changes in viewsheds to National Register listed and National Register eligible properties; and an increase in traffic and associated noise on local roads." [EIS 4-79]

Next, I would like to address problems within the EIS document itself and the assessment of the impacts on the environment of the Master Plan. As I state above, impacts are listed as long-term adverse throughout the document. However, in many instances these impacts are minimized, as with effects of the construction on the environment and affects on City services and hence low-income and minority populations

Generally, I believe that the EIS minimizes the impact of the scope of this project. By accounting for impacts separately, the EIS creates a distorted picture of the completed projects impacts. In reality, we (residents of the AFRH-W and its neighbors) will live with the total accumulated impacts and not each piece.

I believe the number of potential of residents is underestimated. The EIS uses a formula of 1000 GSF per 1.5 person. I used a formula whereby 1 housing unit is an average of 1200 to 1400 Sq Ft. It houses an average of 2.5 people. So that would mean up to 10,000 new people living on the tract. That would be in addition to the 1100 number of current residents of the AFRH.

In addition, many people who might access the AFRH-W property after the development are not accounted for in the EIS. The impacts of Medical facility patients and visitors are not accounted for. Using a formula based on 66 Sq Ft per workers and visitors per day (minus the number of workers estimated in the EIS), that would mean 20,000 additional people per day in the site. The impacts of hotel/conference center guests are also not accounted for in the EIS. According to my conservative estimation, this would mean #228

approximately 750 guests per day (each guest room averaging of 400 sq ft, rendering 500 guest rooms). Shoppers in the proposed retail spaces are not accounted for at all. #228 (continued)

The Lincoln Cottage will be opening soon to tourists creating impacts which are not accounted for in the EIS. The National Trust estimates an initial visitorship of 20,000 per year. Assuming that ¾ of them visit between Memorial Day and Labor Day (97 days), that would be a total of 154 visitors per day during those months (I believe a very conservative estimate for a new National Monument in our capital).

So to calculate the possible total number of people on the current AFRH-W property at any given day, using figures pulled from the EIS and ones that have not been accounted for, the total could be as many as 50,000 people. That is the same amount of people who live in Harrisburg, Pennsylvania. Here is how I came to that conclusion:

17,000 employees [EIS]
10,000 residents (my calculation)
20,000 Medical patients and visitors
Hotel 750 Guests per day
154 visitors to Lincoln cottage
1100 Current residents

#228 (continued)

This is a very modest estimate, as it does not include Conference Center or Retail customers, or employees of the AFRH-W. Is this environment, in all of the dimensions accounted for in the EIS, ready for the population equivalent to a whole city the size of Harrisburg, Pennsylvania to drop on the land now occupied by the AFRH-W?

Aside from these concerns stated in the EIS and the factors I list above, which the EIS neglects to include or minimizes, I have a number of concerns with The Master Plan itself as it is presented (in all of the alternatives). This Master Plan looks at every possible square foot of property that might be developed, rather than the amount of property that would need to be development to meet the needs of the AFRH. If indeed the intent is to create revenue to sustain the AFRH-W and support it's residents, which I wholehearted support, then the Master Plan should look at the minimum amount of development that would meet those needs. Then the rest of the land could be dedicated to the American people, as visitors to a National Monument, and left for the enjoyment and benefit of the veterans who live there.

The Master Plan, as presented in the EIS document dishonors the soldiers who have served our country and contributed to it's continued maintenance and service to retired service men and women. It. takes away the valuable assets that were supposed to be theirs in perpetuity. It degrades the historical value of the site. It breaks rather than creates ties to the adjacent community, and it is entire too much development for this environment to bear.

The Master Plan contradicts the Comprehensive Plan for the National Capital, which provides criteria for the location of federal facilities intended to:

> "Conserve and enhance the park and open space system of the National Capital Region, ensure that adequate resources are available for future generations, and

promote an appropriate balance between open spaces resources and the built environment." And to "Preserve and enhance the image and identity of the Nation's Capital and region through design and development respectful of the guiding principals of the L'Enfant and McMillan Plans, the enduring value of historic buildings and places, and the symbolic character of the capital's setting. [EIS 3-17]

I include these direct quotes from the EIS as they illustrate how development laid out in the Master Plan would destroy the enduring value of historic buildings and places on the AFRH-W property:

Specifically and destructively affected by the proposed development is the historically significant Character Area 6: "The area around the ponds is among the least altered on the AFRH-W grounds and retains significant bridges, a number of exotic and ornamental trees planted in vicinity, and its original fanciful feeling." [EIS 3-35]:

> "The lakes would be most affected by new construction in Zones 4, 5,and 6. As proposed, the new construction would completely surround the Lakes to the north and south, substantially diminishing the historic pastoral and park-like feeling and setting of the Lakes. New construction along Park Place may also result in the loss of the historic fence along the road." [EIS 4-35]

Character Area 7: Cultivated Field would also affect the historic value of the site: "The only remaining area of agricultural cultivation on the AFRH-W, the Cultivated Field Character Area represents a significant and consistent cultural element on the site that reflects the historical function of the Military Asylum from its creation in 1851." [EIS 3-35] "By the mid-20th century, agricultural activity on the site had been almost wholly abandoned except for the garden in the Cultivated Field Character Area. This area is currently used by residents of the AFRH-W of recreational gardening, but remains a significant link to the agricultural past of the AFRH-W." [EIS 3-36]

> "This character area would be most affected by new construction in Zone 6. The Cultivated Field... is one of the few intact areas of open land on the AFRH-W Historic District. This are has been a cultivated field since at least 1873 and illustrates an important link with the agricultural subsistence past of the AFRH-W Historic District. New construction in this zone would result in the loss of this field." [EIS 4-36]

Proposed new construction in Zone 6, according to the Master Plan, would be between six and eight stories in height.

> "When Petworth (and Park View) was originally developed in the late 19th and early 20th centuries, the AFRH-W was used as a public park, a function highly compatible with a residential neighborhood. Although the AFRH-W has not been accessible to the public since 1925, the introduction of new construction in Zone 6 would change this traditional relationship, separating the historic residential construction from the natural landscape of the AFRH-W. Therefore, the proposed action would have an indirect, long-term, moderate, adverse effect on the National Register-eligible Historic District." [EIS 4-38]

Please note as well: "Petworth is potentially eligible for listing as a historic district in the National Register of Historic Places under Criteria A and C." [EIS 3-39]

My final concern is that the environment of a National Monument, which will open to the public soon, is important to the historic preservation and visitor's experience of that landmark. Richard Moe, President of the National Trust calls the site, "...perhaps the most important Lincoln site in the country because it is the only site that represents the Lincoln Presidency." The National Trust anticipates that close to $10 million in capital improvements will be spent for the restoration and development of this National Monument. As this will be an enduring landmark, it behooves us to create a dignified environment for it, and not surround it by a thicket of townhouses or buildings too tall and massive.

This is entirely too much development and impact for this community and site. As a result of the master plan, the EIS anticipates 4,650 vehicles during peak hour! [EIS 4-52]. 14 tons of garbage per day [EIS 4-77], and these assessments this with the amount of residents underestimated, and many users of the site unaccounted for.

The impact of development on the site on the north, east, and southern boundaries of the property will create much less impact as they are away from the National Monument and bordered by institutional properties. This valuable, historic, and pastoral site cannot be recovered once it is over-developed as it is in the Master Plan. When it is gone it is unrecoverable and will just be more densely developed and populated over time.

Because of my desire to honor and see continued care in a safe environment for the retired service men and women who live at the AFRH-W now, and those who will do so in the future. Because of the need to create financial support for the AFRH-W, that does not destroy its value in the process. Because the EIS shows significant problems with the Master Plan, there are problems and consequential omissions in the EIS itself, and there are major concerns with the Master Plan alternatives as presented, I demand:

- That the Master Plan be significantly scaled back and reformulated.
- A new and more thorough EIS be created.
- The community (both residents of the AFRH-W and neighbors) be involved in planning and development.
- Within this new plan, there should be no development at all along the western edge of the property. This would leave the viewshed from the Lincoln Cottage, would leave the historic community garden (possibly opening it to the neighbors as well), and would leave the lakes, which might be made into a public park.

These are fitting surroundings for a significant Historic District and National Monument. This use of the western edge of the site reestablishes ties between the AFRH-W and the Petworth and Park View neighborhoods, and creates an environment of rich historic context, which might be enjoyed in perpetuity by Americans and visitors.

Please be assured of my sincerity in wishing the best to the residents and staff of the Armed Forces Retirement Home, Washington, now and well into the future. Working together, I know we can find a solution to the needs of the AFRH-W without compromising its rich assets.

I look forward to meeting you at the public hearing.

Mark Ewert
401 Rock Creek Church Rd. NW
Washington, DC 20011

Cc: Timothy Fox, Chief Operating Officer, AFRH-W
The Honorable Eleanor Holmes Norton
Mayor Anthony A Williams
Councilmember Adrian Fenty
Ms. Anita Hairston, DC Office of Planning

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: CHARLES FOLDER

Address: AFRH-W-338 SH 6114

Affiliation: RESIDENT

Phone: (202) 829 5552

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

SEE ATTACHED SHEET

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

Zone #1, in all plans: is designated for moderate in-fill development for institutional uses compatible with AFRH-W operations- 4 to 6 stories high and 390,000 gsf- new parking for Grant Bldg. and King Hospital Complex.

Comment: As with other zones, more comprehensive alternate plans are needed in order to assess the heavily adverse environmental impact of construction on the area of zone #1 and the health hazards to the in-dwelling population. #10

Question: Why are the Sheridan and Scott buildings not considered 'sensitive areas' in regard to air quality, noise and the debris of construction in Zone #1? #11

Question: Is it necessary for King Health Center to be evacuated to the proposed new King Hospital complex in Zone #1 before development begins in Zone #3? #12

Question: When will construction begin on the King Hospital Complex, which will be directly adjacent to the dormitories of Independent Living, Assisted Living, COPD, dementia patients and the clinics? #13

Question: How long a period will the "short term" construction be that will seriously affect the health, life spans and peaceful lives of the residents?

Question: Is there any way at present to assess any mitigating measures?

Environmental Justice

Question: Why, under the EIS, are the residents of the AFRH-W not considered a distinct, unique and viable population affected by all environmental issues; or as a 'local community'; or as a minority population to be considered under Executive order #12898? #153

Land Use

Question: Since the irretrievable loss of the AFRH-W Historic District, which is eligible for listing in the National Register, adversely impacts on all present and future AFRH-W eligible veterans, can modified plans and other sources of income also be investigated through the Master plan? #65

Larry G. Friesel
AFRH-W (Sheridan #4204, #733
3700 N. Capitol St. NW
Washington, DC 20011-8400 Phone# (202-316-3440)

June 27, 2005

AFRH-Washington (Master Plan) Draft Environmental Impact Statement Comments (My Opinions!

YES! I would like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available!

1. Proposal #3B seems to be the best (Alternative) (In My Opinion!
2. The (HISTORIC)! Use of this land, for more than 150 years, should be persevered , & of the upmost thought in changes or planning for this LAND! In that, There should be more plans to build (at Least) (1) more Dormitory in addition to The Scott & Sheridan buildings! There has been mention made of a (Parking) garage! I believe, this would be an outstanding addition to concentrate the parking, rather than spread the parking around in different parking areas! The location (Again, In my opinion, should be at the end of the Sheridan building across the street from the existing Security office or location, in the parking area that is now in that location! The parking garage should be at least (5) stories high & have at least (2) elevators to transport the people using the facility! #72 #73
3. Again! Historically! The MILITARY personnel that serve & FIGHT the Wars & Conflicts are soon forgotten, after that war or Conflict is over! Of course, Fighting Men & WOMEN, are remembered at/or on Veterans days Etc. However, benefits & Services are cut & shaved soon after that action is completed! For example, I take note of the recent actions taken by Mr. (H) Ross Perot, for the Veterans of the Viet Nam Conflict! Those Veterans (My service 1961-1981 included) have been almost ignored progressively, by Government programs, such as, Veterans Administration & other actions, from 1975 when the Conflict was concluded, to this day! Soon, the Conflicts of Afghanistan & IRAQ will conclude & what will happen from the time it's over & the days, months & years after it's over? Again, if procedures & programs are any indicator, the same thing will happen, with those Veterans! AFRH-W, should immediately adjust or change the (AGE Minimums) criteria, to accommodate some from those Conflicts &/or Actions! #74
4. I was in attendance to most of the meetings (If not all) & It is apparent that everyone has an opinion as to what & how this LAND is used! Again, the over (150) Year (HISTORIC) usage should always be emphasized to the Veterans & not offices & parks that have limited value to the RESIDENTS! #75
5. The Sherman Building! The front of the building has been renovated & restored, but the first (2) floors in the middle of the building has been ignored or left to storage & general deterioration! This building, HISTORICALLY! Has been built as a Dormitory, but is now Office space, storage, & Hobby rooms on the 3rd floor! More & better usage of this building is sorely needed! If (FUNDS) are available to do the necessary work on the front (3) floors & the relocation of the Security offices, then funds should be there for the (2) floors in the middle of the building! #76

Respectfully,
Larry G. Friesel

A better option:

The AFRH needs money, but the Washington DC campus is not operating at full capacity. In order to rectify this, the current residents of the AFRH in Gulfport should be relocated to Washington and the entire Gulfport campus should be sold for development.

The historical and environmental value of the Washington DC campus clearly makes it the asset to preserve. The historical value of the Gulfport campus is negligible, but its commercial value is great ("The Mississippi Gulf Coast region boasts some of the finest beaches, fishing, casinos, restaurants, resorts, entertainment, shopping, and championship golf courses in the southeast United States." -- AFRH web site). Liquidation of the Gulfport campus should therefore yield considerable revenue. #102

In the 21st century it is not fitting for our nation to continue maintenance of redundant unsustainable facilities for the segregation of veterans from Union and Confederate states.
In reverent memory of President Lincoln, the Washington DC campus should be preserved and improved for it's original purpose, the care and honor of our veterans from every state, and be rededicated with the opening of the Lincoln Cottage as a monument to the preservation of the Union.

Jason Glance
Petworth neighbor

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Michael R. GEORGE

Address: 3700 N CAPITOL ST NW WASHINGTON DC

Affiliation: HOME MEMBER

Phone: 202 829 1749

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☐ Yes ☐ No

Comments A #72

Make area 3,4,5, AFRH-W NATIONAL GRAVEYARD

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: TIMOTHY Q. GRANDY

Address: 115 WEBSTER STREET, NW; WASHINGTON, D.C. 20011

Affiliation: CITY RESIDENT / NEIGHBOR

Phone: 202-829-4394

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

THE PLANNING FIRM RESPONSIBLE FOR THE DEVELOPMENT CONCEPTS APPEAR TO BE STEPPING AWAY FROM SOUND PLANNING PRINCIPLES AND CURRENT GREEN DEVELOPMENT GUIDELINES. NO MENTION OF GREEN DEVELOPMENT WAS MADE IN THE PRESENTATION.

PLEASE SEE THE ATTACHED LETTER FOR MY TRAFFIC CONCERNS

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

Timothy Q. Grandy
115 Webster Street, NW
Washington, DC 20011

Donald Dailey
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

Dear Mr. Dailey,

In attending the Public hearing on June 22, it became very clear that big business is the lead in the subdividing/raping of this National treasure. This big business band-aid seems to have been created because of the federal government's failure to systemically care for the honorable men and women that have served the country. Nothing was said about the future plans for the residents of the Soldiers Home. No growth projections were given for the population. No long range planning to the growth of the home was shared or mentioned. There being only two installations like this in the country it is almost inconceivable how the bad development options presented could even be floated as trial balloons.

I have outlined some traffic concerns:

A. Rock Creek Church Road Volume

1. Two Lanes of traffic that cannot be expanded
2. The District government has refused to provide any type of traffic calming measures along this road, including the use of sidewalks to access north bound busses. Pedestrian safety is key but it is not being adequately addressed. The development plans worsen this situation. #229
3. Access to area 6 and the neighborhoods bordering Rock Creek Church Road cannot be via Harwood Road from North Capitol Street, In assisting traffic to flow more effective through to the suburbs, the Federal Government has eliminated access to the neighborhoods via this route. This will further saturate the flow of traffic along Harwood Road. Because of this Warder street will become overburdened with North bound traffic until Rock Creek Church Road.

B. The Upshur Street Gate

1. The one-way streets currently used to calm traffic flow in the neighborhoods near the Rock Creek Church Road and Upshur Street intersections causes traffic to stack up on Upshur Street during the morning and evening rush hours result in a land locking effect for residents north of Upshur street, and east of Third street desiring to go east. #230

C. The street patterns of the proposed new development should work in with the established city grid and planning. This includes the use of green spaces parks and vistas. #231

D. During the public hearing of June 22. the Washington Hospital Center's representative's made a claim that the traffic study is flawed because the hospital will only contribute to traffic loads during off peak hours. This statement is very misleading as the office development of the property will contribute a 9 to 5 traffic component, the hospital will create traffic within these hours from patients visiting the medical center. #232

Sincerely,

Timothy Q. Grandy

July 6, 2005

Mr. Donald Dailey
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

Dear Mr. Dailey,

As a homeowner and taxpayer in the District of Columbia, I appreciate the opportunity to comment on the Environmental Impact Statement regarding the proposed development on the grounds of the Armed Forces Retirement Home. I have read the Environmental Impact Study, I attended the public comment session at the AFRH, and I have spent considerable time and energy researching the proposal.

It is my conclusion that the EIS fails to address the impact of such large-scale development on the city and the surrounding neighborhoods in terms of traffic, air quality, storm runoff, temperature and noise. It fails to address the need for retention of green space and the initiatives by the federal and local government to expand and enhance public use parklands. #14

And most grievously, in my view, the EIS fails to address how the historically unique nature of this last remaining refuge in the heart of the city will be preserved.

I applaud the efforts of the AFRH along with the National Trust for Historic Preservation to restore and preserve the historic AFRH buildings and the Anderson Cottage. However, the historic value and significance of the President Lincoln and Soldiers' Home National Monument extends far beyond its structures and boundaries to areas of the campus that are targeted for development.

It is no accident that Abraham Lincoln found both comfort and inspiration while residing here. This large tract of peaceable land with its breathtaking vistas provided an extraordinary place for the leader of our country to refresh and expand his mind at a critical point in our nation's history. The simple fact that here is where he was moved to write the Emancipation Proclamation is, alone, sufficient reason to treat this tract with deference.

Any plan to alter the Armed Forces Retirement home property must include a provision to preserve the natural beauty and restful, restorative nature of the landscape and its views. This is, according to the Deputy General Counsel for the National Trust for Historic Preservation "integral to the Monument's historic context and interpretation". #103

The EIS also fails to address the unique role that the AFRH has played in the development and life of the Columbia Heights and Petworth communities. These local neighborhoods of historic row houses—including those in *Park View*, where I live—were laid out in the early part of the 20th century to take advantage of views to the open space along the western edge of the property. The very character of the area is defined by the beauty and quiet that residents and passersby enjoy each day. #208

Long-time residents here talk of anticipating the progress of the gardens tended by residents of the AFRH each summer, a ritual that dates back some 150 years. Sadly, it is all too easy to imagine how different the neighborhood will be if those historic gardens are replaced by high-rise buildings. #104

Unexplained in the development plan and the EIS are the needs for such large and dense development. Questions that naturally arise include:

- Just how much money must be raised to support the ongoing requirements of the AFRH? #45
- Why are there only two alternatives—no development or large-scale development with buildings up to eight stories completely surrounding the periphery of the property? #105
- Has there been any exploration of alternatives, such as a land swap or partial development of areas that are less historically significant? #106
- Has there been any consideration given to opening some of the property to public access for parks and recreation? #107

We all support the AFRH, honor its distinguished residents, and understand the need for the AFRH to replenish its trust fund. This plan does little to explain how the unique historic nature of the property will be preserved under any of the proposed options. Nor does it properly speak to the traditional environmental concerns associated with high-density development on a large scale. It is hard not to see how this plan will degrade the quality of life for the veterans, neighbors and residents of the city.

I urge you to send this plan back for further development and review.

Respectfully,

Lauri Hafvenstein
3650 Park Place NW
Washington, DC 20010
202-723-2407

Mr. Dailey:

I would like to submit written comments on the Armed Forces Retirement Home Environmental Impact Statement. I reside at 602 Quincy St NW, about a block and a half west of parcel 6. My comments are the following:

* I strongly oppose the proposal for retail shops on parcel 6. Retail shops will only make the streets between the developed parcel and Georgia Avenuea corridor for additional foot and automobile traffic, and therefore drug traffic, which will increase the violence level in our already-violent neighborhood. By the time that the new development is completed, the shops at the Georgia Avenuemetro, only 3 blocks away, will have been completed. There is no need to add additional retail. #128

* Any residential or institutional/embassy development should be required to provide parking for each resident/employee. #136

* I am extremely disturbed that there is no plan to preserve community green space. Any community development, particularly when it is getting rid of what little green space we have in our community, should be mandated to maintain at least 10% of the space as parkland accessible to the community. It's bad enough that the children at Park View Elementary, a few blocks south, have only a concrete lot to play in; it would be a travesty if the children of the neighborhood were not provided with a real park when it would be so easy to maintain some of the lovely trees and open space. #108

Thank you,

Heather B. Hamilton

Heather B. Hamilton

Vice President for Programs

Citizens for Global Solutions

418 7th St. SE

Washington, DC20003

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www.globalsolutions.org

July 6, 2005

Armed Forces Retirement Home
Attn: Donald Dailey
3700 North Capitol Street, NW,
Washington, DC 20011

Dear Mr. Dailey:

Below please find comments on the Armed Forces Retirement Home Washington Master Plan, Draft Environmental Impact Statement, May 2005 by the group Petworth and Colombia Heights Residents Concerned.

1. Residents of the area have received inadequate advance notice of this draft EIS and comment period to be able to respond meaningfully. Notice was given after most local community groups went into recess for the summer. The comment period was too short of local residents to obtain the EIS and educate themselves about the EIS process adequately to respond in a meaningful manner. Notice of the EIS was not widely enough publicized for many parties interested in the outcome to be aware of the EIS. For example, the Committee of 100 for the Federal City, a leading advocate of protection of the L'Enfant and McMillan plans was not aware of the draft EIS until we were told of their existence and were able to reach them by phone just prior to the July 4th holiday. Several organizations who should have been directly served with the EIS, such as the D.C. Department of Parks and Recreation do not appear to have been notified. There appears have been no Spanish or French/Creole outreach to Spanish and French/Creole speaking residents in the surrounding area early enough in the process for these residents to have effective participation in the process. Adjacent census tracts have populations that are 8 to 15% Hispanic and have many Creole speaking Haitians. Nearby areas that will be affected by the loss of potential park space have even higher proportions of Spanish speaking populations.

   To provide adequate opportunity for comment, the comment period on the draft EIS should be extended and additional meetings for public comment on the draft EIS should be held. To make this effective there must a multi-media outreach through television commercials, radio commercials, and multiple local papers, including newspapers targeted at local Spanish language, neighborhood and African American communities. The fact that there were so few comments to the scoping and that almost all comments from residents were from residents of the Soldier's and Airmen's Home is a sign of the ineffectiveness of the outreach effort associated with this process.

2. The EIS masks the fact that the AFRH is proposing extremely dense development of park-like open space in the middle of a neighborhood that is disproportionately low income, elderly, and African American. The density of the proposed development is so

high that is likely to have disproportionately high and adverse human and environmental effects on minority and low-income populations.

The EIS is incorrect in concluding that low income and minority populations would not be disproportionately affected by the impacts of the development alternatives outlined under the EIS. The EIS implies that this neighborhood is an average U.S. neighborhood by comparing median income statistics for the entirety of the District of Colombia ($40,127) to the U.S. as a whole ($41,994). This is extremely misleading since the income distribution in the District of Columbia proper has a large percent of the Washington metropolitan area's minority, poor and low income households. The median income of the Washington Metropolitan Statistical Area (MSA) is $80,642. As noted in the draft EIS, there are likely to be more localized impacts. These also fall disproportionately on low income, elderly, African American populations.

The EIS incorrectly compares these local areas to the District of Columbia as a whole in determining whether they are disproportionately low income, minority populations. It is inappropriate to consider the District of Columbia as the proper unit of comparison for these neighborhoods for Environmental Justice analysis. The District of Columbia is essentially the inner city core of a large metropolitan area. As such it has a very high concentration of the metropolitan area's poor and minority population, as is demonstrated by the almost two-fold discrepancy between District of Columbia and Washington MSA median income. The proper unit of comparison is the Washington Metropolitan Statistical Area.

The Washington Metropolitan area is where local residents must compete for jobs, housing, and goods and services. The federal government recognizes this in adjusting its pay structure upwards for DC as one of the nation's high cost of living areas. According to the U.S. Census and the U.S. Department of Housing and Urban Development, the census tracts neighboring Soldier's Home on the west have median incomes ranging from $32,00 to $44,000 compared to the Washington metropolitan area median of $80,642. This places this neighborhood in the lower 20th income percentile for the Washington area (HUD).

The EIS also incorrectly uses the District as the relevant comparison for race. Here the more appropriate comparison is with national data. Anti-discrimination laws and policy, including the Executive Order on Environmental Justice are designed to address a national legacy of racism. According to the logic of the EIS, if all African Americans in the U.S. were forced onto a reservation occupied exclusively by African Americans and a federal project affected a portion of that reservation, it would have no disproportionate impact on African Americans. This is certainly not the intent of the Executive Order. The inner city core of most large urban cities contain large areas of minority ghetto. It is inappropriate to look at comparisons of the affected neighborhood with minority population statistics for the District of Columbia simply because the District is the federal reservation and does not fall under the jurisdiction of a state. This Constitutional peculiarity should not be used to perpetrate environmentally injustice federal action on low income, minority U.S. citizens.

The census tracts neighboring Soldier's Home are 82-90 % African American, compared to 26.6 percent in the Washington MSA and 12.4% nationally. The neighborhood is known as the home of Black Washington's grandparents, and the census statistics bear this out -- roughly 16-18% of area residents are over 65, compared to the 9 percent in the Washington MSA and 12.4% in the U.S. population. Along with this elderly, low income, minority population comes expected life outcomes: 15-26% of individuals are below the poverty line, as compared with 7.4% in the Washington MSA and 12.4% nationally; 25-33% are disabled compared to 19% nationally; only 12-18% of residents in these census tracts have bachelor's degrees or above compared to 42.5% for the Washington MSA and 24% nationally. Despite the disadvantages they bear because of their race, age, and disproportionately low income and education these neighbors have managed to have some of the highest owner-occupancy rates in the District of Columbia. This is a major achievement given the odds against which they have had to work to accomplish this.

All existing alternatives, except the "no-development" alternative envision very dense development on most of the Soldier's Home property. This is likely to have major adverse impacts on the health and well-being of residents in the neighborhood to the west of Soldier's Home as well as to the health of elderly residents at the Armed Forces Retirement Home:

1) These alternatives all call for an extremely large increase in traffic as indicated by the large increase in parking spaces (an underestimate since it does not account for visitor travel). There is also likely to be increased air pollution from construction and possibly from electrical generation for the large institutions planned. The Washington, D.C. metropolitan area is already out of compliance with federal EPA air quality standards. This increase in automobile traffic will worsen an already bad situation, particularly in the summer. The EIS needs to include analysis that shows the impacts of proposed development, both during construction and upon completion on local ambient air quality and on health outcomes for local area residents. Health outcomes need to be analyzed by age.

   Air pollution problems are local as well as regional in scope. The immediate neighborhood seems likely to see the largest change in air quality from this increased traffic. Local air pollution is linked to increased incidence of respiratory illness. Three different recent studies being published this month in *Epidemiology* find a significant link between daily ground-level ozone in cities and mortality rates in the next 3 days. Ozone is formed when pollutants, such as car exhaust, mix with heat and sunlight. Editors of *Epidemiology* have made the rather unprecedented comment that together these studies point to an "urgent need to reduce public exposure to ambient ozone by all possible means."

Communities of color across the nation are experiencing disproportionately high levels of asthma and other respiratory illness. The deteriorated local air quality seems likely also worsen these conditions in this predominantly African American neighborhood. Further analysis is needed that specifies how the health of these residents will be affected by proposed alternatives.

2) The EIS does not consider the impact that the proposed dramatic replacement of green meadow, lawn and trees with buildings and paved surface will have on temperatures in the surrounding area. This past spring, gardens in the Petworth area bloomed roughly 2 weeks later than gardens in the DuPont Circle area. It seems unlikely that this difference is due to the small difference in elevation, and is more likely to the difference in heat generated by the dense built and paved surfaces in the DuPont Circle area and the cooling effect of open space and trees in the Petworth area – particularly at Soldier's Home.

Increased temperatures will result in higher cooling bills, particularly burdensome for the elderly poor, or an increased frequency of dangerous summer conditions for those who cannot afford air conditioning, again particularly the elderly poor. Increased temperatures will also worsen the impact on increased exhaust by promoting local ground--level ozone formation. The EIS contains no analysis of local temperature change that will be associated with the proposed alternatives. This analysis needs to be done. It should include expected health impacts (by age), and impact on cooling costs for area residents.

3) At the current time, the mature trees on the Soldier's Home property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality.

4) The transportation impact study of the EIS has not considered the impact of increased traffic on side streets between Soldier's Home and Georgia Ave. The impact on the level of increased traffic considered is unlikely to be limited to the main streets studied in the EIS. Analysis must be done on changed traffic on these side streets.

The neighborhoods to the west of the Soldier's Home property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The EIS has not considered the impact of increased traffic on loss of recreational services provided by streets in Petworth and Park View. This needs to be taken into account.

The District of Columbia government has recognized that there is a serious problem with pedestrian deaths from being hit by cars on DC streets. Bringing a large number of cars into narrow residential streets will likely increase the

mortality rate in the area to the west of Soldier's Home, particularly because of the relatively large number of elderly and children. Analysis of traffic impacts needs to include estimates of the change in accidents and deaths.

5) Many residents in the area to the west of Soldier's Home use their basements for living space or rent them out to gain much needed income. Soldier's Home enjoys the physical advantages of being the third highest point in the District of Columbia. The EIS has not considered how dense construction on the Soldier's Home property will change the water table and how this might affect basements in the adjacent, lower lying area. A rise in the water table seems likely to result from dense development on this land. A raised water table could result in a serious damage to the use of basements and a substantial loss in income. Analysis must be done of the likely physical impacts of proposed alternatives on the water table in adjacent areas and the financial impacts of any changes on local residents.

6) Both residents of the Armed Forces Retirement Home and neighbors who live to the west of the home benefit, much as President Lincoln did when he lived in the Anderson cottage, from the relative calm and quiet provided by the green campus of the Home. The EIS notes that the noise level in the are is that usually found in parks. Area residents enjoy being able to walk past the property and to see it's green expanses when looking out their windows or down their streets. In this way, the Home has provided area residents with a real source of wealth that improves their quality of life in ways that they could not purchase no matter what their income was. This neighborhood does not seem poor to its residents no matter their income because it does not look like a poor neighborhood. The increased traffic, noise, and loss of green beauty and calm will take away something of irreplaceable value in their lives. Economists have developed methods for valuing this loss of amenity, including hedonic property value studies and contingent valuation studies. Frequently this can be done using "benefits transfer" of values from existing comparable studies. Such analysis needs to be included in the EIS.

◆ The EIS has considered two types of alternatives: no development and dense development on virtually the entire perimeter of the Armed Forces Retirement Home. Additional alternatives need to be considered, such as development of some, but not all of the areas considered for development in currently proposed alternatives. Conservation of open space, particularly in the western half of the Soldier's Home property or protection of that land as open space by transferring the land to park authorities would mitigate the negative impact of development of eastern half of the property on residents around the property.

It is not at all clear that the EIS has taken the Federal Elements of the Comprehensive Plan for the National Capital adequately into account. In particular, there appears to have been an marked inattention to the Parks and Open Element and the Preservation and Historic Features Element.

The Parks and Open Space Element of the Comprehensive Plan for the National Capital makes clear that the capital area is facing increasing demand for open space and park due to increased population and tourism pressure. The Element defines open space as "any land or water surface that is not occupied by buildings, a broad definition that encompasses the vast majority of federal property" (p. 3). Under the Park and Open Space Element directs that federal agencies should:

1) maintain and conserve federal open space as a means of shaping and enhancing urban areas (p. 7);
2) preserve open space that is crucial to the long-term quality of life of a neighborhood or region;
3) Conserve and maintain the essential open space character of areas in the region with significant park, open space cultural or natural qualities that contribute to the setting of the National Capital Region." The Element specifically includes McMillan Reservoir to the immediate south of Area 5 as an example.
4) "Conserve portions of military reservations that add significantly to the inventory of park, open space, and natural areas and should, to the extent practicable be used by the public for recreation … [i.e.,] when *security* considerations permit (p. 8-9)." The Element *explicitly includes U.S. Soldier's and Airmen's Home* as an example of this.
5) "Maintain and conserve trees and other vegetation in the landscaped buffer areas on federal installations in a natural condition."

The Park and Open Space Element also stresses the importance of connectivity between parks and open spaces in the Capital Region. As already note, the Element has identified both Soldier's Home and McMillan Reservoir to its immediate south as areas to be preserved as open space and parkland. Fort Totten to the northeast of Soldier's Home is also an important part of the long-run open space plan for the Capital region. As land is currently configured, links could be made between these three areas through green bikeways forming a long, continuous area of open space linked to the Circle Forts chain of open space. Loss of the Soldier's Home property to development could seriously impair this open space connectivity. Alternatives must be considered that preserve this connectivity.

The Parks and Open Space Element highlights the unique role that parks created around historic sites play in the Capital Region. The federal government is to "establish and preserve historic parks as important legacies of national, historic, architectural and landscape significance. The Anderson cottage and two acres surrounding it have been designated a National Monument because of its importance in Lincoln and other 19th century presidencies. But as the EIS notes, the importance of the AFRH site does not stop with this. To its immediate north is the first national military cemetery, predating Arlington National Cemetery. The home itself was has been in continuous use as a final home for members of the U.S. Armed Services since the middle of the 19th century. It is the U.S. equivalent of Les Invalides in Paris. Its central landscaped core and the agricultural land (now garden) of area 6 are

essentially unchanged from the 19th century and provide a coherent and important historical context for the National Monument, cemetery and historically important home. The Elements are very clear about the importance of protecting historic landscapes such as the Soldier's Home property from development.

The Parks and Open Space Element of the Federal Plan also commits the federal government to protecting terrain features of the region through careful design. In particular, it notes the importance of maintaining vistas of the Monumental core of L'Enfant City's core area and protecting the escarpments that provide these overlooks. As the third highest point in the District of Columbia and one of the only undeveloped ones, the AFRH property is one of the areas that falls under the federal government commitment to protect "topographic bowl features."

The Preservation and Historic Features Element of the Comprehensive Plan for the National Capital Federal Elements complements the Parks and Open Space Element. The Preservation and Historic Features Element is not limited to preservation of historic structures and landscapes. A major concern is the "preservation and strengthening historic urban design features, such as the L'Enfant Plan." As part of this the Element commits federal agencies to "protecting the character of the region's natural features, many of which have historical or cultural significance, such as … *the ridge of the topographic bowl, agricultural land, … and designed landscapes.*" All of these features are present on the Soldier's Home property and the alternatives proposed do not adequately take their protection into account. In particular plans to develop areas 5 and 6 will disturb historically agricultural land that was historically an integral part of the function of both Soldier's Home and the Anderson cottage, as well as disrupt the landscape of the topographic bowl. In particular, the Federal Plan calls for the federal government to "protect the skyline formed by the region's natural features, particularly the topographic bowl around central Washington" and to "protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital's image."
The Preservation and Historic Features Federal Elements sets policies regarding federal government stewardship of historic properties and the historic plan of Washington, D.C. Under these Elements federal agencies should:

1) protect the settings of historic properties, including views to and from sites where significant, as integral parts of the historic character of the property (p. 8);
2) protect the *reservations that contain historic landscapes and features from incompatible changes or incursion*;
3) protect views .. *inward from vantage points along the rim of the topographic bowl from inappropriate intrusions. Open space should be preserved to allow for public use and enjoyment of these views. (Examples include …the escarpment north of Florida, Ave. NW)*..

The Parks and Open Space Element of the Comprehensive Plan for the National Capital: Federal Elements directs the federal government to look to redevelopment of surplus federal property as a means of adding to the region's inventory of parks and open space

and notes that future acquisitions could occur by purchase, easement, donation or exchange. An alternative that has not been included in the EIS is exchange of much of the land in the western half of AFRH-W (in particular areas 5 and 6) for other federal surplus land that could be more appropriately developed. Exchanging this land for land in another location and development there could provide needed financial resources for AFRH. The western half of AFRH-W could then continue to play the important role they currently play in the Districts system of federal open space by protecting historic landscapes, providing appropriate context for an important historical site and protecting views of the central core of the capital as directed by the Federal Elements. If the land were transferred to the National Park Service to enlarge the President Lincoln and Soldier's Home National Monument, this would not only preserve open space, but would help protect the historical integrity of the setting for the cottage as a place of retreat and rest, thus preventing the kind of encroachment of inappropriate new development that has so adversely affected the Manassas Battle Field and other major Civil War historic sites. It would also enhance public access to much needed open space in the District as a whole as well as the adjacent neighborhoods. In addition, it may serve to substantially mitigate adverse environmental impacts of proposed development on the eastern areas part of the Soldier's Home campus. Specific alternatives are outlined below.

The District of Columbia Parks and Recreation is currently in the middle of a comprehensive planning process. As part of this effort they are conducting a survey of park and recreation needs. Preliminary results from this survey are indicating a significant deficit of park space in the Petworth, Park View, Colombia Heights area. This is self-evident from any map of parkland in the District of Columbia. The Soldier's Home property is a uniquely large landscaped open space, one of the few remaining unprotected open space areas in the eastern part of residential Washington DC. The planning process for development of the AFRH-W property should be timed to accommodate consideration of the current comprehensive planning process of the DC Dept of Parks and Recreation.

The District of Columbia Dept. of Parks and Recreation included on the draft EIS service list. Our understanding is that they did not learn of the EIS until July 1, inadequate time to properly respond. The comment period for the EIS should be extended so that they can complete their comprehensive planning process in a way that can consider potential use of part of the Soldier's Home Property to meet District Park need.

A park that would consist of much of the western half of the Soldier's Home property would be easily accessible to dense development in neighboring Colombia Heights, and to planned dense residential development along Georgia Ave., Sherman Ave, as well as dense development planned for the rest of the Soldier's Home site. If connected to McMillan Reservoir, it would provide direct park access to LeDroit Park and Eckington, also areas underserved by parkland in the District. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northeast DC.

The open space already provided by Soldier's Home is an integral design element of the adjacent Historic Register-eligible row house neighborhoods of Petworth and Park View, developed in the early 1900s. Surrounding streets to the west of the Home were designed to take advantage of vistas of the open space provided by the Home's property. For example, the vista from Grant Circle down Illinois Ave to Area 6 is an important anchoring design element in the eastern part of Petworth. The Preservation Element of the Federal Elements direct federal agencies to "protect reciprocal views along rights-of-way and from … circles (p. 11)." Replacing the vista of this green expanse that opens out over a view of the federal core of the city with a view of an eight story apartment building would significant harm the integrity of historic city plan in this part of the capital.

Among the alternatives, the EIS has not considered alternatives that would provide significant parkland for the neighborhood to the west of the home. As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of Soldier's Home were developed in the early 1900s around the presence of the Soldier's Home as open space.

It is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the draft EIS. Notice of the EIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for the monumental core or to the superintendent of Rock Creek Parkway.

The draft EIS states that the proposed master plan alternatives would have long-term, major, adverse cumulative impacts on the historic resources of the Soldier's Home property and the adjacent National Register-Eligible Historic Districts. As described above, the proposed alternatives are also inconsistent with park and open space directives of the Comprehensive Plan for the National Capital: Federal Elements. No alternative, except the no development alternative, considers anything except significant built development on all 6 areas. Other alternatives should be considered that will mitigate these impacts on historic landscapes and buildings and fulfill the intended role of the Soldier's Home property as open space or parkland under the Comprehensive Plan, including:

1) No development on the area west of a line extending north through the Soldier's Home Property from 1st St. NW. This would buffer adjacent residential neighborhoods to the west from the noise, heat, air pollution, traffic and change in water table that is likely to result from development on the eastern half of the property. It would reduce the environmental impact to the Washington region as a whole by avoiding creating of a large area of impervious surface in a drainage area and a new heat island. It would protect almost all of the currently undisturbed historical landscape and buildings.

2) Exchange of land west of a line extending north through the Soldier's Home Property from 1st St. NW that is not actively used for AFRH mission for surplus federal land. The

Soldier's Home property to go to the National Park Service for development as public park space as part of the President Lincoln and Soldier's Home National Monument. The land received by AFRH in exchange should be used for revenue generating purposes for the AFRH. The park would provide the environmental, social, and historic preservation mitigation described in alternative 1 above as well as meeting the park and open space and historic preservation directives of the Federal Elements of the Comprehensive Plan for the National Capital. The land received by AFRH in the exchange should be such as to provide comparable revenue generation for the AFRH to the most likely, legal land use allowable on the exchanged Soldier's Home property. This alternative would have the advantage of achieving AFRH-W financial goals while permanently assuring that residents of the AFRH-W would enjoy something much closer to the open space and environmental amenities they currently enjoy than would be possible under any of the considered development alternatives.

3) Sell the land to the west of a line extending north through the Soldier's Home Property from 1st St. NW that is not actively used for AFRH mission to the District of Columbia for use as city park. This would buffer adjacent residential neighborhoods to the west from the noise, heat, air pollution, traffic and change in water table that is likely to result from development on the eastern half of the property. It would protect almost all of the currently undisturbed historical landscape and buildings as well as meeting the park and open space and historic preservation directives of the Federal Elements of the Comprehensive Plan for the National Capital. The sale would provide revenue to the AFRH. Perhaps part of the sales arrangement could be an agreement not to challenge increased density on the eastern half of the property. Petworth and Columbia Heights Residents Concerned commits to working to find sources of private funding from Foundations and large individual donors to augment city funding for purchase of the property. This alternative would have the advantage of achieving AFRH-W financial goals while permanently assuring that residents of the AFRH-W would enjoy something much closer to the open space and environmental amenities they currently enjoy than would be possible under any of the considered development alternatives.

4) Putting no built development on historic character areas.

- None of the alternatives are described with enough specificity for residents to truly understand the impact on their neighborhood. To address this vagueness there should be significant, substantive participation of the residents in the area comparable to that required by DC planning and development process.

- Residents need to advised of how and when they can participate in the Section 106 Historic Review process with enough advanced notice (6 months) that they can organize to participate.

- At. p. 1-1 the EIS describes the AFRH as "a 272 acre *underdeveloped*, urban site". This characterization demonstrates the insensitivity shown throughout this EIS to the critical role this property plays in the landscape of the Capital and its historic, environmental and public space integrity. The Comprehensive Plan for the National Capital specifically lists U.S. Soldier's and Airmen's Home as an important, historic area of open space that should be conserved and opened to public recreational use to the extent physically compatible with the use of other parts of the property for military purposes (p. 8 of the Park and Open Space Element of the Federal Elements of the Comprehensive Plan for the National Capital). As noted above, in multiple other ways, the alternatives for development proposed in the EIS are inconsistent with the Comprehensive Plans Federal Element requirements among these: protection of terrain features, meeting increasing need for parks, providing connectivity of federal public open space (McMillan Reservoir and potentially Fort Totten Park), preservation of the historic urban design of the National Capital, protection of the landscape context of historic parks (President Lincoln and Soldier's Home National Monument), protection of views inward from vantage points along the rim of the topographic bowl (specifically mentioning the escarpment north of Florida Ave, of which the Soldier's Home property is a part), and protection of views from circles in the extensions of the L'Enfant Plan (Sherman Circle to Grant Circle to Area 6 in the EIS).

- The AFRH's need for revenue does not give it the legal right to destroy an important public open space in contravention of the Comprehensive Plan for the National Capital and other federal law. The law does not allow homeowners to build 120 story office buildings on their single-family zoned property just because they need to pay their medical bills or pay for their children's college education, especially when such use would violate other legal requirements. The use of land must be consistent with the applicable land use plan and other legal requirements. The mere fact that Congress has approved sale of the land does not make all possible land uses legal, nor is the Act approving sale of the land itself necessarily invulnerable to legal challenge. Other alternatives to meet the AFRH's funding requirements that are consistent with the Comprehensive Plan for the National Capital, federal environmental and historic preservation law and Executive Order 21898 have not been considered. The Federal Elements themselves suggest alternatives that have not been considered that could help the AFRH meet their financial needs in a way consistent with the Comprehensive Plan and federal laws. This includes engaging the National Park Service and the General Services Administration in finding alternative surplus federal land that is suitable for dense development or other revenue generation that could be exchanged for the Soldier's Home property and movement of Soldier's Home property to the National Park Service. This alternative should be pursued.

- The EIS lists as an objective of the planned development to "provide sufficient revenue to support the AFRH's goal of resident-focused care while replenishing the depleting Trust Fund, and to "Grow the Trust Fund to not only meet the needs of today's residents, but the needs of future generations as well (p.i)." The EIS does not provide an accounting of how much money is needed for this purpose, how much money is likely to be generated by each proposal and in particular the alternatives for each designated development area for each proposed alternative. There is no indication of how the funds would be managed so that the AFRH does not in a few years insist that it has to develop the remainder of its land to fulfill its mandate. The AFRH has already sold off substantial portions of its original property to fund its activities. The land currently occupied by the Washington Hospital complex was sold several years ago. Land east of N. Capital St. was sold recently to Catholic University. There is no accounting in the EIS for how this money was used and why it was not sufficient to meet the AFRH budgetary needs. In fact, this pattern of land sale for development suggests that the current land sales and proposed development are only a stop-gap measure that will not assure the AFRH financial stability into a meaningful time in the future. Given the burden that the proposed development would impose on the entire District of Columbia and in particular, neighboring communities, and given the irreplaceable loss of historic open space, the lost opportunity for development of greatly needed and highly valuable park land in the center of the District, and the irreversible disruption of the historic physical plan for the District, it seems incumbent on the AFRH to show that this action has a reasonable chance of actually accomplishing the stated financial goal. This analysis has not been included in the draft EIS. It needs to be included.

- The neighborhood to the west of Soldier's Home is politically well-organized with many well functioning neighborhood civic organization and an active ANC. The neighborhood pays close attention to land use issues and has successfully challenged plans to build the Greenline of the metro above ground and the proposal for a District DMV building at the corner of Georgia and New Hampshire Aves. NW. Thus it seems very strange that *none* of these civic organizations were aware of the Scoping Meetings held in September of 2004 before they happened. Since that time, when we contacted the AFRH to inquire about what was happening with the site we were told that there was nothing to report. Then in late May 2005, after most of our organizations went on summer recess and many of our neighbors had made plans to be out of town, we learned that a draft EIS was being released. This timing, coupled with the short length of the comment period, has made it impossible for us to use our normal means of action through neighborhood organization meetings to respond to the draft EIS. This is not meaningful public participation. The EIS should specify a meaningful process for public participation, comparable to that required under DC planning and development law. Without this, the goal stated in the EIS to "ensure an open, participatory process with the AFRH-W residents and the community" is empty words.

- Neighborhood associations to the west of Soldier's Home were not given notice of when the Section 106 process was initiated which may have prejudiced our ability to

participate in that process. Petworth and Colombia Heights Residents Concerned , United Neighborhood Coalition and other neighborhood organizations are currently inquiring into how to become participants in this process.

- Petworth and Colombia Heights Residents Concerned requests status as a consulting party to the Section 106 process.

- Use of property values and associated taxes as the sole indicators of financial impact of the proposed development on the neighboring community doc not provide an adequate measure of this impact. These only capture impact on long-term wealth, and do not capture impact on cash flows. Many neighboring homeowners use basement apartments to create a stream of income that helps them pay their mortgages and meet other expenses. Others use their basements for living space without which they might be forced to seek larger, less affordable housing elsewhere. Changes in water tables may result from dense development on nearby higher ground and this may impair the use of these basements as rental property and living space. Also, many residents do not have off street parking. Increased traffic and increased parking demand will likely result in residents paying more parking tickets. In a poor to moderate income neighborhood, $30 parking tickets are a substantial financial burden. The EIS should include analysis of these impacts.

- The indicators used to assess impact on minority and low-income populations are also inadequate. In particular, impact of proposed development on ambient temperatures that could result in higher cooling bills and higher mortality and morbidity rates should be included as a indicator. In addition to looking at changes in ambient conditions, the likely impacts of these changes on the health of these populations and on medical expenses and their ability to insure must be considered for all environmental impacts. Likely impacts include increased incidence and severity of asthma and other respiratory illness, increased incidence and severity of coronary and circulatory conditions, increased hearing loss, increased stress related illness.

- The indicators of impact on natural resources are inadequate. The current set of indicators is limited to impact on ponds on the Soldier's Home property itself. The perennial stream running through the center of the project area is hydrologically connected to other water bodies flowing into the Anacostia and/or Potomac Rivers. Increased run-off from the dense development proposed under the EIS will have adverse impacts on the Anacostia and Potomac Rivers. It is likely that the increased run-off will have impacts on property owners downhill from the site. The severe flooding experienecs in the DuPont Circle area in the early 1990s after severe rainstorms demonstrates the environmental function that open spaces like that at the Soldier's Home play in preventing environmental and property damage from run-off. These likely impacts need to be further quantified in the EIS.

- Indicators of impacts on the transportation system should include expected increases in auto accidents and pedestrian accidents and deaths from the increased traffic.

- In addition to using changes in decibel levels as an indicator of increased noise level that can be expected from the proposed development alternatives, the impact of these changes on hearing and other health outcomes for area residents needs to be enumerated.

- Indicators of impacts on historic resources (p. I-10) appear to be limited to the impact on structures on the AFRH-W site that will be demolished. The Preservation and Historic Features Element of the Comprehensive Plan for the National Capital makes clear that given the historic importance of the Capital area in the nation's life, that historic preservations concerns are much broader than this. Indicators should also include disturbance and development of historic landscapes on the Soldier's Home property, the rim of the topographic bowl of the Washington basin which includes almost all of the AFRH-W site as well as visual and physical impacts on the adjacent historic neighborhoods build in the early 20th century as extensions of the L'Enfant plan.

- In addition to increases in emissions over time as a indication of changes in air quality, the EIS needs to estimate the impact of these changes on ambient air quality in both the immediate vicinity of the AFRH-W property and the Washington area as a whole. This estimate needs to include the interaction of multiple pollutants and changed ambient temperature associated with the proposed development. These estimates of impact on ambient air quality then need to be used to provide estimates of the change in health outcomes for residents living in or near the AFRH-W site as well as in the Washington Metropolitan area air shed. Changed ambient air quality will also have impacts on built structures in the area. This needs to be included as an indicator of impact. In particular, impact on historic structures and cemeteries both on the AFRH-W, in nearby neighborhoods, and in the Washington area as a whole must be assessed in the EIS.

- Auto emissions contribute to nitrogen deposition in the Chesapeake Bay. Nutrient pollution is causing widespread destruction of natural habitat in the Chesapeake Bay and auto emissions have been found to be a significant contributor to this. These impacts also need to be included in the evaluation of impact of proposed development on air quality.

- Development design and site landscaping on historic properties or changes that can affect historic properties or historic landscapes in the District of Columbia or that affect the historic plan of the District of Columbia or views from circles are explicitly subject to the Comprehensive Plan for the National Capital: Federal Elements and are therefore *not* outside the scope of the EIS. These must be given consideration. This is particularly true since the outcome of the EIS will be selection of one of the alternative development plans presented and any proposed mitigation measures and no further role for public participation by neighbors, civic organizations, or the District government is specified beyond comment on this EIS and participation in the Section 106 process.

- Despite the fact that the purpose of the EIS is "creation of a master plan for the AFRH-W that will sustain the AFRH and its primary source of funding, the AFRH Trust Fund" (p. 2-1), no analysis of the expected financial consequences of each alternative is provided.

- Analysis of development on zone 6 has not considered its relationship to District of Columbia Department of Planning plans for development on Georgia Avenue. All alternatives must be analyzed in relationship to development currently contemplated in District of Columbia planning for Georgia Ave. NW, in Columbia Heights, along the adjacent N. Capitol St. corridor, and neighborhoods to the east of the AFRH-W property.

- The EIS fails to note in the description of the affected environment that the AFRH-W occupies a prominence along the topographic rim of the Washington basin. This is a geologic feature that is designated for protection under the Federal Elements of the Comprehensive Plan for the National Capital.

- The draft EIS provides inadequate analysis of the ability of the pond on the property, that provide stormwater retention would be able to handle the added run-off from substantial increases in paved area on areas that drain into them.

- The description of wildlife that use the home is very brief and incomplete. Area residents regularly see deer on the property as well as raccoons and possum. Further analysis is needed.

- The EIS description of the project area history gives incomplete mention of the extensive use of the Anderson Cottage by President Lincoln during his Presidency and no mention of the use of the AFRH-W property as a summer residence by other U.S. presidents during the 19th Century. The history fails to explain that the reason for this use was that the property provided a serene country retreat away from the stress and heat of the then developed area of Washington near the mall. This information should be included in the history of the site in the EIS.

- A more detailed description of the location, nature and history of historic landscape features on the AFRH-W property than are provided in the draft EIS are needed for those outside the AFRH-W to be able to assess the impact of development alternatives on historic landscape features as required by the Federal Elements of the Comprehensive Plan of the National Capital. This is particularly true if there is to be meaningful public participation, a goal stated in the EIS, since the public is allowed almost no physical access to the AFRH-W property.

- Analysis of the impact of changed zoning does not take into account current planned development in the surrounding areas. The EIS looks at the AFRH-W site in

isolation from development in the surrounding community. The District of Columbia Georgia Ave revitalization strategy (Dec. 2004) calls for dense residential and commercial development on Georgia Ave. stretching from Howard University north well above the site. This area is 2-4 blocks west of much of the proposed dense housing and commercial development on the western sides of the AFRH-W site. This is already an area of developed, though blighted commercial and residential development. It seems likely given the direction of development in the are that it will be revitalized soon, significantly reducing the benefit to the surrounding area of residential and commercial development on the western part of the AFRH-W property and increasing the harm done by lost green space. In addition, dense residential and commercial development is already under construction in central Columbia Heights 8 blocks west of the AFRH-W property. This development is going to significantly increase traffic in the area and will also increase demand for open space and park. This growing demand for open space and park land in the area, which already experiences a deficit of public park, is what part of what motivates the National Comprehensive Plan for the National Capital: Federal Elements designation of the Soldier's Home property as an area to be conserved as open space and park land. This development and land use likely reduces the benefit of housing and commercial development on AFRH-W property and increases its value as park and open space. This analysis needs to be included in the EIS.

- The traffic analysis seems to underestimate traffic increases from the addition of up to 16,678 additional employees and 7,500 residents and up to 16,678 additional parking spaces to an area that currently has a population of roughly 12,000. The analysis also only looks at impact on major roadways, not the side streets immediate to the west of the Soldier's Home property. Yet this scale of development will inevitably result in significant increase in the use of side streets as well as increased parking pressure on these streets. This is in addition to significant additional increased population planned for the Georgia Ave. Corridor a very few blocks to the west.

- The noise analysis needs to be revisited and further analysis of noise impacts, both during and after construction needs to be included in the EIS. It strains credulity to say that with the planned increase in population, construction, built hard environment and traffic that there will be no or virtually no change in noise level on Rock Creek Church Road or adjacent streets of row homes. There is certainly a difference between the noise level on New Hampshire Avenue and Rock Creek Church Road with current traffic levels.

- Further analysis is needed of the cumulative impact of the on air emissions, ambient air quality standards and health- and welfare-based air quality standards. The EIS also needs to have modeling of the impact of the demolition, operation of the new buildings, plus the added traffic on local and regional air quality as measured by these indicators.

- Further analysis is needed of the impact of removal of trees, green space coupled with the increased auto emissions on global warming.

- The EIS needs to clarify how storm water requirements will be met during construction as well as during operation or after completion of the development.

- The EIS must include further analysis of the impact of all wastes, solid and hazardous from proposed development, including impacts on landfill capacity.

- The parking plans and traffic patterns and noise analysis have adequately addressed the full impact of traffic and noise from visitors to planned hospital, institutional and commercial development.

- The noise analysis has not adequately addressed the impact of increased emergency vehicle traffic, including helicopters and ambulances, associated with the planned hospital expansion on adjoining neighborhoods, including the Shrine of the Immaculate Conception, and retreat houses in the Catholic University/Brookland area.

- The EIS analysis of particulate matter and dust during construction and after completion of planned development is inadequate.

Sincerely,

Petworth and Columbia Residents Concerned.

Contact person:
Sandra Hoffmann
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Washington, DC 20011

(202) 328-5022 (o)
hoffmann@rff.org

July 7, 2005

Armed Forces Retirement Home
Attn: Donald Dailey
3700 North Capitol Street, NW,
Washington, DC 20011

Dear Mr. Dailey:

Enclosed please find a hard, signed copy of the comments (17 pages) on the Armed Forces Retirement Home – Washington Master Plan, Draft Environmental Impact Statement, May 2005. These comments were submitted to you yesterday (July 6, 2005) by the group Petworth and Colombia Heights Residents Concerned.

Sincerely,

Sandra Hoffmann

Contact person for Petworth and Colombia Heights Residents Concerned
(202) 328-5022

Hoffmann, Sandy

From: Hoffmann, Sandy
Sent: Wednesday, July 06, 2005 5:05 PM
To: 'donald.dailey@afrh.gov'
Subject: Petworth and Columbia Heights Concerned comments on AFRH-W draft EIS



PCHR Comments on draft AFRH EI...

Dear Mr. Docker,

Attached please find comments to the draft EIS for development of the Soldier's and Airmen's Home property, "Armed Forces Retirement Home - Washington Master Plan Draft Environmental Impact Statement May 2005".

Thank you,

Sandra Hoffmann

July 6, 2005

Armed Forces Retirement Home
Attn: Donald Dailey
3700 North Capitol Street, NW,
Washington, DC 20011

Dear Mr. Dailey:

Below please find comments on the Armed Forces Retirement Home – Washington Master Plan, Draft Environmental Impact Statement, May 2005 by the group Petworth and Colombia Heights Residents Concerned.

1. Residents of the area have received inadequate advance notice of this draft EIS and comment period to be able to respond meaningfully. Notice was given after most local community groups went into recess for the summer. The comment period was too short of local residents to obtain the EIS and educate themselves about the EIS process adequately to respond in a meaningful manner. Notice of the EIS was not widely enough publicized for many parties interested in the outcome to be aware of the EIS. For example, the Committee of 100 for the Federal City, a leading advocate of protection of the L'Enfant and McMillan plans was not aware of the draft EIS until we were told of their existence and were able to reach them by phone just prior to the July 4th holiday. Several organizations who should have been directly served with the EIS, such as the D.C. Department of Parks and Recreation do not appear to have been notified. There appears have been no Spanish or French/Creole outreach to Spanish and French/Creole speaking residents in the surrounding area early enough in the process for these residents to have effective participation in the process. Adjacent census tracts have populations that are 8 to 15% Hispanic and have many Creole speaking Haitians. Nearby areas that will be affected by the loss of potential park space have even higher proportions of Spanish speaking populations.

   To provide adequate opportunity for comment, the comment period on the draft EIS should be extended and additional meetings for public comment on the draft EIS should be held. To make this effective there must a multi-media outreach through television commercials, radio commercials, and multiple local papers, including newspapers targeted at local Spanish language, neighborhood and African American communities. The fact that there were so few comments to the scoping and that almost all comments from residents were from residents of the Soldier's and Airmen's Home is a sign of the ineffectiveness of the outreach effort associated with this process.

2. The EIS masks the fact that the AFRH is proposing extremely dense development of park-like open space in the middle of a neighborhood that is disproportionately low income, elderly, and African American. The density of the proposed development is so

high that is likely to have disproportionately high and adverse human and environmental effects on minority and low-income populations.

The EIS is incorrect in concluding that low income and minority populations would not be disproportionately affected by the impacts of the development alternatives outlined under the EIS. The EIS implies that this neighborhood is an average U.S. neighborhood by comparing median income statistics for the entirety of the District of Colombia ($40,127) to the U.S. as a whole ($41,994). This is extremely misleading since the income distribution in the District of Columbia proper has a large percent of the Washington metropolitan area's minority, poor and low income households. The median income of the Washington Metropolitan Statistical Area (MSA) is $80,642. As noted in the draft EIS, there are likely to be more localized impacts. These also fall disproportionately on low income, elderly, African American populations.

The EIS incorrectly compares these local areas to the District of Columbia as a whole in determining whether they are disproportionately low income, minority populations. It is inappropriate to consider the District of Columbia as the proper unit of comparison for these neighborhoods for Environmental Justice analysis. The District of Columbia is essentially the inner city core of a large metropolitan area. As such it has a very high concentration of the metropolitan area's poor and minority population, as is demonstrated by the almost two-fold discrepancy between District of Columbia and Washington MSA median income. The proper unit of comparison is the Washington Metropolitan Statistical Area.

The Washington Metropolitan area is where local residents must compete for jobs, housing, and goods and services. The federal government recognizes this in adjusting its pay structure upwards for DC as one of the nation's high cost of living areas. According to the U.S. Census and the U.S. Department of Housing and Urban Development, the census tracts neighboring Soldier's Home on the west have median incomes ranging from $32,00 to $44,000 compared to the Washington metropolitan area median of $80,642. This places this neighborhood in the lower 20th income percentile for the Washington area (HUD).

The EIS also incorrectly uses the District as the relevant comparison for race. Here the more appropriate comparison is with national data. Anti-discrimination laws and policy, including the Executive Order on Environmental Justice are designed to address a national legacy of racism. According to the logic of the EIS, if all African Americans in the U.S. were forced onto a reservation occupied exclusively by African Americans and a federal project affected a portion of that reservation, it would have no disproportionate impact on African Americans. This is certainly not the intent of the Executive Order. The inner city core of most large urban cities contain large areas of minority ghetto. It is inappropriate to look at comparisons of the affected neighborhood with minority population statistics for the District of Columbia simply because the District is the federal reservation and does not fall under the jurisdiction of a state. This Constitutional peculiarity should not be used to perpetrate environmentally injustice federal action on low income, minority U.S. citizens.

The census tracts neighboring Soldier's Home are 82-90 % African American, compared to 26.6 percent in the Washington MSA and 12.4% nationally. The neighborhood is known as the home of Black Washington's grandparents, and the census statistics bear this out – roughly 16-18% of area residents are over 65, compared to the 9 percent in the Washington MSA and 12.4% in the U.S. population. Along with this elderly, low income, minority population comes expected life outcomes: 15-26% of individuals are below the poverty line, as compared with 7.4% in the Washington MSA and 12.4% nationally; 25-33% are disabled compared to 19% nationally; only 12-18% of residents in these census tracts have bachelor's degrees or above compared to 42.5% for the Washington MSA and 24% nationally. Despite the disadvantages they bear because of their race, age, and disproportionately low income and education these neighbors have managed to have some of the highest owner-occupancy rates in the District of Columbia. This is a major achievement given the odds against which they have had to work to accomplish this.

All existing alternatives, except the "no-development" alternative envision very dense development on most of the Soldier's Home property. This is likely to have major adverse impacts on the health and well-being of residents in the neighborhood to the west of Soldier's Home as well as to the health of elderly residents at the Armed Forces Retirement Home:

1) These alternatives all call for an extremely large increase in traffic as indicated by the large increase in parking spaces (an underestimate since it does not account for visitor travel). There is also likely to be increased air pollution from construction and possibly from electrical generation for the large institutions planned. The Washington, D.C. metropolitan area is already out of compliance with federal EPA air quality standards. This increase in automobile traffic will worsen an already bad situation, particularly in the summer. The EIS needs to include analysis that shows the impacts of proposed development, both during construction and upon completion on local ambient air quality and on health outcomes for local area residents. Health outcomes need to be analyzed by age.

   Air pollution problems are local as well as regional in scope. The immediate neighborhood seems likely to see the largest change in air quality from this increased traffic. Local air pollution is linked to increased incidence of respiratory illness. Three different recent studies being published this month in *Epidemiology* find a significant link between daily ground-level ozone in cities and mortality rates in the next 3 days. Ozone is formed when pollutants, such as car exhaust, mix with heat and sunlight. Editors of *Epidemiology* have made the rather unprecedented comment that together these studies point to an "urgent need to reduce public exposure to ambient ozone by all possible means."

Communities of color across the nation are experiencing disproportionately high levels of asthma and other respiratory illness. The deteriorated local air quality seems likely also worsen these conditions in this predominantly African American neighborhood. Further analysis is needed that specifies how the health of these residents will be affected by proposed alternatives.

2) The EIS does not consider the impact that the proposed dramatic replacement of green meadow, lawn and trees with buildings and paved surface will have on temperatures in the surrounding area. This past spring, gardens in the Petworth area bloomed roughly 2 weeks later than gardens in the DuPont Circle area. It seems unlikely that this difference is due to the small difference in elevation, and is more likely to the difference in heat generated by the dense built and paved surfaces in the DuPont Circle area and the cooling effect of open space and trees in the Petworth area – particularly at Soldier's Home.

Increased temperatures will result in higher cooling bills, particularly burdensome for the elderly poor, or an increased frequency of dangerous summer conditions for those who cannot afford air conditioning, again particularly the elderly poor. Increased temperatures will also worsen the impact on increased exhaust by promoting local ground—level ozone formation. The EIS contains no analysis of local temperature change that will be associated with the proposed alternatives. This analysis needs to be done. It should include expected health impacts (by age), and impact on cooling costs for area residents.

3) At the current time, the mature trees on the Soldier's Home property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality.

4) The transportation impact study of the EIS has not considered the impact of increased traffic on side streets between Soldier's Home and Georgia Ave. The impact on the level of increased traffic considered is unlikely to be limited to the main streets studied in the EIS. Analysis must be done on changed traffic on these side streets.

The neighborhoods to the west of the Soldier's Home property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The EIS has not considered the impact of increased traffic on loss of recreational services provided by streets in Petworth and Park View. This needs to be taken into account. #224

The District of Columbia government has recognized that there is a serious problem with pedestrian deaths from being hit by cars on DC streets. Bringing a large number of cars into narrow residential streets will likely increase the

mortality rate in the area to the west of Soldier's Home, particularly because of the relatively large number of elderly and children. Analysis of traffic impacts needs to include estimates of the change in accidents and deaths. #224 (continued)

5) Many residents in the area to the west of Soldier's Home use their basements for living space or rent them out to gain much needed income. Soldier's Home enjoys the physical advantages of being the third highest point in the District of Columbia. The EIS has not considered how dense construction on the Soldier's Home property will change the water table and how this might affect basements in the adjacent, lower lying area. A rise in the water table seems likely to result from dense development on this land. A raised water table could result in a serious damage to the use of basements and a substantial loss in income. Analysis must be done of the likely physical impacts of proposed alternatives on the water table in adjacent areas and the financial impacts of any changes on local residents.

6) Both residents of the Armed Forces Retirement Home and neighbors who live to the west of the home benefit, much as President Lincoln did when he lived in the Anderson cottage, from the relative calm and quiet provided by the green campus of the Home. The EIS notes that the noise level in the arc is that usually found in parks. Area residents enjoy being able to walk past the property and to see it's green expanses when looking out their windows or down their streets. In this way, the Home has provided area residents with a real source of wealth that improves their quality of life in ways that they could not purchase no matter what their income was. This neighborhood does not seem poor to its residents no matter their income because it does not look like a poor neighborhood. The increased traffic, noise, and loss of green beauty and calm will take away something of irreplaceable value in their lives. Economists have developed methods for valuing this loss of amenity, including hedonic property value studies and contingent valuation studies. Frequently this can be done using "benefits transfer" of values from existing comparable studies. Such analysis needs to be included in the EIS.

◆ The EIS has considered two types of alternatives: no development and dense development on virtually the entire perimeter of the Armed Forces Retirement Home. Additional alternatives need to be considered, such as development of some, but not all of the areas considered for development in currently proposed alternatives. Conservation of open space, particularly in the western half of the Soldier's Home property or protection of that land as open space by transferring the land to park authorities would mitigate the negative impact of development of eastern half of the property on residents around the property.

It is not at all clear that the EIS has taken the Federal Elements of the Comprehensive Plan for the National Capital adequately into account. In particular, there appears to have been an marked inattention to the Parks and Open Element and the Preservation and Historic Features Element.

The Parks and Open Space Element of the Comprehensive Plan for the National Capital makes clear that the capital area is facing increasing demand for open space and park due to increased population and tourism pressure. The Element defines open space as "any land or water surface that is not occupied by buildings, a broad definition that encompasses the vast majority of federal property" (p. 3). Under the Park and Open Space Element directs that federal agencies should:

1) maintain and conserve federal open space as a means of shaping and enhancing urban areas (p. 7);
2) preserve open space that is crucial to the long-term quality of life of a neighborhood or region;
3) Conserve and maintain the essential open space character of areas in the region with significant park, open space cultural or natural qualities that contribute to the setting of the National Capital Region." The Element specifically includes McMillan Reservoir to the immediate south of Area 5 as an example.
4) "Conserve portions of military reservations that add significantly to the inventory of park, open space, and natural areas and should, to the extent practicable be used by the public for recreation … [i.e.,] when *security* considerations permit (p. 8-9)." The Element *explicitly includes U.S. Soldier's and Airmen's Home* as an example of this.
5) "Maintain and conserve trees and other vegetation in the landscaped buffer areas on federal installations in a natural condition."

The Park and Open Space Element also stresses the importance of connectivity between parks and open spaces in the Capital Region. As already note, the Element has identified both Soldier's Home and McMillan Reservoir to its immediate south as areas to be preserved as open space and parkland. Fort Totten to the northeast of Soldier's Home is also an important part of the long-run open space plan for the Capital region. As land is currently configured, links could be made between these three areas through green bikeways forming a long, continuous area of open space linked to the Circle Forts chain of open space. Loss of the Soldier's Home property to development could seriously impair this open space connectivity. Alternatives must be considered that preserve this connectivity.

The Parks and Open Space Element highlights the unique role that parks created around historic sites play in the Capital Region. The federal government is to "establish and preserve historic parks as important legacies of national, historic, architectural and landscape significance. The Anderson cottage and two acres surrounding it have been designated a National Monument because of its importance in Lincoln and other 19th century presidencies. But as the EIS notes, the importance of the AFRH site does not stop with this. To its immediate north is the first national military cemetery, predating Arlington National Cemetery. The home itself was has been in continuous use as a final home for members of the U.S. Armed Services since the middle of the 19th century. It is the U.S. equivalent of Les Invalides in Paris. Its central landscaped core and the agricultural land (now garden) of area 6 are

essentially unchanged from the 19th century and provide a coherent and important historical context for the National Monument, cemetery and historically important home. The Elements are very clear about the importance of protecting historic landscapes such as the Soldier's Home property from development.

The Parks and Open Space Element of the Federal Plan also commits the federal government to protecting terrain features of the region through careful design. In particular, it notes the importance of maintaining vistas of the Monumental core of L'Enfant City's core area and protecting the escarpments that provide these overlooks. As the third highest point in the District of Columbia and one of the only undeveloped ones, the AFRH property is one of the areas that falls under the federal government commitment to protect "topographic bowl features."

The Preservation and Historic Features Element of the Comprehensive Plan for the National Capital Federal Elements complements the Parks and Open Space Element. The Preservation and Historic Features Element is not limited to preservation of historic structures and landscapes. A major concern is the "preservation and strengthening historic urban design features, such as the L'Enfant Plan." As part of this the Element commits federal agencies to "protecting the character of the region's natural features, many of which have historical or cultural significance, such as ... *the ridge of the topographic bowl, agricultural land, ... and designed landscapes.*" All of these features are present on the Soldier's Home property and the alternatives proposed do not adequately take their protection into account. In particular plans to develop areas 5 and 6 will disturb historically agricultural land that was historically an integral part of the function of both Soldier's Home and the Anderson cottage, as well as disrupt the landscape of the topographic bowl. In particular, the Federal Plan calls for the federal government to "protect the skyline formed by the region's natural features, particularly the topographic bowl around central Washington" and to "protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital's image."
The Preservation and Historic Features Federal Elements sets policies regarding federal government stewardship of historic properties and the historic plan of Washington, D.C. Under these Elements federal agencies should:

1) protect the settings of historic properties, including views to and from sites where significant, as integral parts of the historic character of the property (p. 8);
2) protect the *reservations that contain historic landscapes and features from incompatible changes or incursion*;
3) protect views .. *inward from vantage points along the rim of the topographic bowl from inappropriate intrusions. Open space should be preserved to allow for public use and enjoyment of these views. (Examples include ...the escarpment north of Florida, Ave. NW)*..

The Parks and Open Space Element of the Comprehensive Plan for the National Capital: Federal Elements directs the federal government to look to redevelopment of surplus federal property as a means of adding to the region's inventory of parks and open space

and notes that future acquisitions could occur by purchase, easement, donation or exchange. An alternative that has not been included in the EIS is exchange of much of the land in the western half of AFRH-W (in particular areas 5 and 6) for other federal surplus land that could be more appropriately developed. Exchanging this land for land in another location and development there could provide needed financial resources for AFRH. The western half of AFRH-W could then continue to play the important role they currently play in the Districts system of federal open space by protecting historic landscapes, providing appropriate context for an important historical site and protecting views of the central core of the capital as directed by the Federal Elements. If the land were transferred to the National Park Service to enlarge the President Lincoln and Soldier's Home National Monument, this would not only preserve open space, but would help protect the historical integrity of the setting for the cottage as a place of retreat and rest, thus preventing the kind of encroachment of inappropriate new development that has so adversely affected the Manassas Battle Field and other major Civil War historic sites. It would also enhance public access to much needed open space in the District as a whole as well as the adjacent neighborhoods. In addition, it may serve to substantially mitigate adverse environmental impacts of proposed development on the eastern areas part of the Soldier's Home campus. Specific alternatives are outlined below.

The District of Columbia Parks and Recreation is currently in the middle of a comprehensive planning process. As part of this effort they are conducting a survey of park and recreation needs. Preliminary results from this survey are indicating a significant deficit of park space in the Petworth, Park View, Colombia Heights area. This is self-evident from any map of parkland in the District of Columbia. The Soldier's Home property is a uniquely large landscaped open space, one of the few remaining unprotected open space areas in the eastern part of residential Washington DC. The planning process for development of the AFRH-W property should be timed to accommodate consideration of the current comprehensive planning process of the DC Dept of Parks and Recreation.

The District of Columbia Dept. of Parks and Recreation included on the draft EIS service list. Our understanding is that they did not learn of the EIS until July 1, inadequate time to properly respond. The comment period for the EIS should be extended so that they can complete their comprehensive planning process in a way that can consider potential use of part of the Soldier's Home Property to meet District Park need.

A park that would consist of much of the western half of the Soldier's Home property would be easily accessible to dense development in neighboring Colombia Heights, and to planned dense residential development along Georgia Ave., Sherman Ave, as well as dense development planned for the rest of the Soldier's Home site. If connected to McMillan Reservoir, it would provide direct park access to LeDroit Park and Eckington, also areas underserved by parkland in the District. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northeast DC.

The open space already provided by Soldier's Home is an integral design element of the adjacent Historic Register-eligible row house neighborhoods of Petworth and Park View, developed in the early 1900s. Surrounding streets to the west of the Home were designed to take advantage of vistas of the open space provided by the Home's property. For example, the vista from Grant Circle down Illinois Ave to Area 6 is an important anchoring design element in the eastern part of Petworth. The Preservation Element of the Federal Elements direct federal agencies to "protect reciprocal views along rights-of-way and from ... circles (p. 11)." Replacing the vista of this green expanse that opens out over a view of the federal core of the city with a view of an eight story apartment building would significant harm the integrity of historic city plan in this part of the capital.

Among the alternatives, the EIS has not considered alternatives that would provide significant parkland for the neighborhood to the west of the home. As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of Soldier's Home were developed in the early 1900s around the presence of the Soldier's Home as open space.

It is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the draft EIS. Notice of the EIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for the monumental core or to the superintendent of Rock Creek Parkway.

The draft EIS states that the proposed master plan alternatives would have long-term, major, adverse cumulative impacts on the historic resources of the Soldier's Home property and the adjacent National Register-Eligible Historic Districts. As described above, the proposed alternatives are also inconsistent with park and open space directives of the Comprehensive Plan for the National Capital: Federal Elements. No alternative, except the no development alternative, considers anything except significant built development on all 6 areas. Other alternatives should be considered that will mitigate these impacts on historic landscapes and buildings and fulfill the intended role of the Soldier's Home property as open space or parkland under the Comprehensive Plan, including:

> 1) No development on the area west of a line extending north through the Soldier's Home Property from 1st St. NW. This would buffer adjacent residential neighborhoods to the west from the noise, heat, air pollution, traffic and change in water table that is likely to result from development on the eastern half of the property. It would reduce the environmental impact to the Washington region as a whole by avoiding creating of a large area of impervious surface in a drainage area and a new heat island. It would protect almost all of the currently undisturbed historical landscape and buildings.
>
> 2) Exchange of land west of a line extending north through the Soldier's Home Property from 1st St. NW that is not actively used for AFRH mission for surplus federal land. The Soldier's Home property to go to the National Park Service for

development as public park space as part of the President Lincoln and Soldier's Home National Monument. The land received by AFRH in exchange should be used for revenue generating purposes for the AFRH. The park would provide the environmental, social, and historic preservation mitigation described in alternative 1 above as well as meeting the park and open space and historic preservation directives of the Federal Elements of the Comprehensive Plan for the National Capital. The land received by AFRH in the exchange should be such as to provide comparable revenue generation for the AFRH to the most likely, legal land use allowable on the exchanged Soldier's Home property. This alternative would have the advantage of achieving AFRH-W financial goals while permanently assuring that residents of the AFRH-W would enjoy something much closer to the open space and environmental amenities they currently enjoy than would be possible under any of the considered development alternatives.

3) Sell the land to the west of a line extending north through the Soldier's Home Property from 1st St. NW that is not actively used for AFRH mission to the District of Columbia for use as city park. This would buffer adjacent residential neighborhoods to the west from the noise, heat, air pollution, traffic and change in water table that is likely to result from development on the eastern half of the property. It would protect almost all of the currently undisturbed historical landscape and buildings as well as meeting the park and open space and historic preservation directives of the Federal Elements of the Comprehensive Plan for the National Capital. The sale would provide revenue to the AFRH. Perhaps part of the sales arrangement could be an agreement not to challenge increased density on the eastern half of the property. Petworth and Columbia Heights Residents Concerned commits to working to find sources of private funding from Foundations and large individual donors to augment city funding for purchase of the property. This alternative would have the advantage of achieving AFRH-W financial goals while permanently assuring that residents of the AFRH-W would enjoy something much closer to the open space and environmental amenities they currently enjoy than would be possible under any of the considered development alternatives.

4) Putting no built development on historic character areas.

- None of the alternatives are described with enough specificity for residents to truly understand the impact on their neighborhood. To address this vagueness there should be significant, substantive participation of the residents in the area comparable to that required by DC planning and development process.

- Residents need to advised of how and when they can participate in the Section 106 Historic Review process with enough advanced notice (6 months) that they can organize to participate.

- At. p. 1-1 the EIS describes the AFRH as "a 272 acre *underdeveloped*, urban site". This characterization demonstrates the insensitivity shown throughout this EIS to the critical role this property plays in the landscape of the Capital and its historic, environmental and public space integrity. The Comprehensive Plan for the National Capital specifically lists U.S. Soldier's and Airmen's Home as an important, historic area of open space that should be conserved and opened to public recreational use to the extent physically compatible with the use of other parts of the property for military purposes (p. 8 of the Park and Open Space Element of the Federal Elements of the Comprehensive Plan for the National Capital). As noted above, in multiple other ways, the alternatives for development proposed in the EIS are inconsistent with the Comprehensive Plans Federal Element requirements among these: protection of terrain features, meeting increasing need for parks, providing connectivity of federal public open space (McMillan Reservoir and potentially Fort Totten Park), preservation of the historic urban design of the National Capital, protection of the landscape context of historic parks (President Lincoln and Soldier's Home National Monument), protection of views inward from vantage points along the rim of the topographic bowl (specifically mentioning the escarpment north of Florida Ave, of which the Soldier's Home property is a part), and protection of views from circles in the extensions of the L'Enfant Plan (Sherman Circle to Grant Circle to Area 6 in the EIS).

- The AFRH's need for revenue does not give it the legal right to destroy an important public open space in contravention of the Comprehensive Plan for the National Capital and other federal law. The law does not allow homeowners to build 120 story office buildings on their single-family zoned property just because they need to pay their medical bills or pay for their children's college education, especially when such use would violate other legal requirements. The use of land must be consistent with the applicable land use plan and other legal requirements. The mere fact that Congress has approved sale of the land does not make all possible land uses legal, nor is the Act approving sale of the land itself necessarily invulnerable to legal challenge. Other alternatives to meet the AFRH's funding requirements that are consistent with the Comprehensive Plan for the National Capital, federal environmental and historic preservation law and Executive Order 21898 have not been considered. The Federal Elements themselves suggest alternatives that have not been considered that could help the AFRH meet their financial needs in a way consistent with the Comprehensive Plan and federal laws. This includes engaging the National Park

Service and the General Services Administration in finding alternative surplus federal land that is suitable for dense development or other revenue generation that could be exchanged for the Soldier's Home property and movement of Soldier's Home property to the National Park Service. This alternative should be pursued.

- The EIS lists as an objective of the planned development to "provide sufficient revenue to support the AFRH's goal of resident-focused care while replenishing the depleting Trust Fund, and to "Grow the Trust Fund to not only meet the needs of today's residents, but the needs of future generations as well (p.i)." The EIS does not provide an accounting of how much money is needed for this purpose, how much money is likely to be generated by each proposal and in particular the alternatives for each designated development area for each proposed alternative. There is no indication of how the funds would be managed so that the AFRH does not in a few years insist that it has to develop the remainder of its land to fulfill its mandate. The AFRH has already sold off substantial portions of its original property to fund its activities. The land currently occupied by the Washington Hospital complex was sold several years ago. Land east of N. Capital St. was sold recently to Catholic University. There is no accounting in the EIS for how this money was used and why it was not sufficient to meet the AFRH budgetary needs. In fact, this pattern of land sale for development suggests that the current land sales and proposed development are only a stop-gap measure that will not assure the AFRH financial stability into a meaningful time in the future. Given the burden that the proposed development would impose on the entire District of Columbia and in particular, neighboring communities, and given the irreplaceable loss of historic open space, the lost opportunity for development of greatly needed and highly valuable park land in the center of the District, and the irreversible disruption of the historic physical plan for the District, it seems incumbent on the AFRH to show that this action has a reasonable chance of actually accomplishing the stated financial goal. This analysis has not been included in the draft EIS. It needs to be included.

- The neighborhood to the west of Soldier's Home is politically well-organized with many well functioning neighborhood civic organization and an active ANC. The neighborhood pays close attention to land use issues and has successfully challenged plans to build the Greenline of the metro above ground and the proposal for a District DMV building at the corner of Georgia and New Hampshire Aves. NW. Thus it seems very strange that *none* of these civic organizations were aware of the Scoping Meetings held in September of 2004 before they happened. Since that time, when we contacted the AFRH to inquire about what was happening with the site we were told that there was nothing to report. Then in late May 2005, after most of our organizations went on summer recess and many of our neighbors had made plans to be out of town, we learned that a draft EIS was being released. This timing, coupled with the short length of the comment period, has made it impossible for us to use our normal means of action through neighborhood organization meetings to respond to the draft EIS. This is not meaningful public participation. The EIS should specify a meaningful process for public participation, comparable to that required under DC planning and development law. Without this, the goal stated in the EIS to "ensure an

open, participatory process with the AFRH-W residents and the community" is empty words.

- Neighborhood associations to the west of Soldier's Home were not given notice of when the Section 106 process was initiated which may have prejudiced our ability to participate in that process. Petworth and Colombia Heights Residents Concerned , United Neighborhood Coalition and other neighborhood organizations are currently inquiring into how to become participants in this process.

- Petworth and Colombia Heights Residents Concerned requests status as a consulting party to the Section 106 process.

- Use of property values and associated taxes as the sole indicators of financial impact of the proposed development on the neighboring community doe not provide an adequate measure of this impact. These only capture impact on long-term wealth, and do not capture impact on cash flows. Many neighboring homeowners use basement apartments to create a stream of income that helps them pay their mortgages and meet other expenses. Others use their basements for living space without which they might be forced to seek larger, less affordable housing elsewhere. Changes in water tables may result from dense development on nearby higher ground and this may impair the use of these basements as rental property and living space. Also, many residents do not have off street parking. Increased traffic and increased parking demand will likely result in residents paying more parking tickets. In a poor to moderate income neighborhood, $30 parking tickets are a substantial financial burden. The EIS should include analysis of these impacts.

- The indicators used to assess impact on minority and low-income populations are also inadequate. In particular, impact of proposed development on ambient temperatures that could result in higher cooling bills and higher mortality and morbidity rates should be included as a indicator. In addition to looking at changes in ambient conditions, the likely impacts of these changes on the health of these populations and on medical expenses and their ability to insure must be considered for all environmental impacts. Likely impacts include increased incidence and severity of asthma and other respiratory illness, increased incidence and severity of coronary and circulatory conditions, increased hearing loss. increased stress related illness.

- The indicators of impact on natural resources are inadequate. The current set of indicators is limited to impact on ponds on the Soldier's Home property itself. The perennial stream running through the center of the project area is hydrologically connected to other water bodies flowing into the Anacostia and/or Potomac Rivers. Increased run-off from the dense development proposed under the EIS will have adverse impacts on the Anacostia and Potomac Rivers. It is likely that the increased run-off will have impacts on property owners downhill from the site. The severe flooding experiences in the DuPont Circle area in the early 1990s after severe rainstorms demonstrates the environmental function that open spaces like that at the

Soldier's Home play in preventing environmental and property damage from run-off. These likely impacts need to be further quantified in the EIS.

- Indicators of impacts on the transportation system should include expected increases in auto accidents and pedestrian accidents and deaths from the increased traffic.

- In addition to using changes in decibel levels as an indicator of increased noise level that can be expected from the proposed development alternatives, the impact of these changes on hearing and other health outcomes for area residents needs to be enumerated.

- Indicators of impacts on historic resources (p. 1-10) appear to be limited to the impact on structures on the AFRH-W site that will be demolished. The Preservation and Historic Features Element of the Comprehensive Plan for the National Capital makes clear that given the historic importance of the Capital area in the nation's life, that historic preservations concerns are much broader than this. Indicators should also include disturbance and development of historic landscapes on the Soldier's Home property, the rim of the topographic bowl of the Washington basin which includes almost all of the AFRH-W site as well as visual and physical impacts on the adjacent historic neighborhoods build in the early 20th century as extensions of the L'Enfant plan.

- In addition to increases in emissions over time as a indication of changes in air quality, the EIS needs to estimate the impact of these changes on ambient air quality in both the immediate vicinity of the AFRH-W property and the Washington area as a whole. This estimate needs to include the interaction of multiple pollutants and changed ambient temperature associated with the proposed development. These estimates of impact on ambient air quality then need to be used to provide estimates of the change in health outcomes for residents living in or near the AFRH-W site as well as in the Washington Metropolitan area air shed. Changed ambient air quality will also have impacts on built structures in the area. This needs to be included as an indicator of impact. In particular, impact on historic structures and cemeteries both on the AFRH-W, in nearby neighborhoods, and in the Washington area as a whole must be assessed in the EIS.

- Auto emissions contribute to nitrogen deposition in the Chesapeake Bay. Nutrient pollution is causing widespread destruction of natural habitat in the Chesapeake Bay and auto emissions have been found to be a significant contributor to this. These impacts also need to be included in the evaluation of impact of proposed development on air quality.

- Development design and site landscaping on historic properties or changes that can affect historic properties or historic landscapes in the District of Columbia or that affect the historic plan of the District of Columbia or views from circles are explicitly subject to the Comprehensive Plan for the National Capital: Federal Elements and are therefore *not* outside the scope of the EIS. These must be given consideration.

This is particularly true since the outcome of the EIS will be selection of one of the alternative development plans presented and any proposed mitigation measures and no further role for public participation by neighbors, civic organizations, or the District government is specified beyond comment on this EIS and participation in the Section 106 process.

- Despite the fact that the purpose of the EIS is "creation of a master plan for the AFRH-W that will sustain the AFRH and its primary source of funding, the AFRH Trust Fund" (p. 2-1), no analysis of the expected financial consequences of each alternative is provided.

- Analysis of development on zone 6 has not considered its relationship to District of Columbia Department of Planning plans for development on Georgia Avenue. All alternatives must be analyzed in relationship to development currently contemplated in District of Columbia planning for Georgia Ave. NW, in Columbia Heights, along the adjacent N. Capitol St. corridor, and neighborhoods to the east of the AFRH-W property.

- The EIS fails to note in the description of the affected environment that the AFRH-W occupies a prominence along the topographic rim of the Washington basin. This is a geologic feature that is designated for protection under the Federal Elements of the Comprehensive Plan for the National Capital.

- The draft EIS provides inadequate analysis of the ability of the pond on the property, that provide stormwater retention would be able to handle the added run-off from substantial increases in paved area on areas that drain into them.

- The description of wildlife that use the home is very brief and incomplete. Area residents regularly see deer on the property as well as raccoons and possum. Further analysis is needed.

- The EIS description of the project area history gives incomplete mention of the extensive use of the Anderson Cottage by President Lincoln during his Presidency and no mention of the use of the AFRH-W property as a summer residence by other U.S. presidents during the 19th Century. The history fails to explain that the reason for this use was that the property provided a serene country retreat away from the stress and heat of the then developed area of Washington near the mall. This information should be included in the history of the site in the EIS.

- A more detailed description of the location, nature and history of historic landscape features on the AFRH-W property than are provided in the draft EIS are needed for those outside the AFRH-W to be able to assess the impact of development alternatives on historic landscape features as required by the Federal Elements of the

also needs to have modeling of the impact of the demolition, operation of the new buildings, plus the added traffic on local and regional air quality as measured by these indicators.

- Further analysis is needed of the impact of removal of trees, green space coupled with the increased auto emissions on global warming.

- The EIS needs to clarify how storm water requirements will be met during construction as well as during operation or after completion of the development.

- The EIS must include further analysis of the impact of all wastes, solid and hazardous from proposed development, including impacts on landfill capacity.

- The parking plans and traffic patterns and noise analysis have adequately addressed the full impact of traffic and noise from visitors to planned hospital, institutional and commercial development.

- The noise analysis has not adequately addressed the impact of increased emergency vehicle traffic, including helicopters and ambulances, associated with the planned hospital expansion on adjoining neighborhoods, including the Shrine of the Immaculate Conception, and retreat houses in the Catholic University/Brookland area.

- The EIS analysis of particulate matter and dust during construction and after completion of planned development is inadequate.

Sincerely,

Petworth and Columbia Residents Concerned.

Sandra Hoffmann contact person

Contact person:
Sandra Hoffmann
701 Taylor St. NW
Washington, DC 20011

(202) 328-5022 (o)
hoffmann@rff.org

Dear Mr. Dailey:

Please add this comment to the Draft EIS for the AFRH development master plan.

The Armed Forces Retirement Home must select the "no action" alternative.

The only way to bring about a benefit to the home's residents, the community and the nation is to scrap the three development alternatives.

The home's residents don't want to build on the open land they enjoy for hiking and gardening.

The people who live in the neighborhoods around the home don't want the traffic congestion, ground pollution and air pollution this intense development would bring.

The people of America would oppose this rush to development before they have the chance to enjoy Lincoln's cottage and see the land as our greatest president saw it.

Too few people have known about this rush to development. By selecting the no action alternative, all parties would have more time to get involved in selecting a long-term vision that truly benefits the home, the community and the nation.

Congress would never have approved this sale if it was fully briefed on the massive scope of this development, the neighborhood opposition and the importance of Lincoln's cottage.

There are many other, less destructive ways to get the Armed Forces Retirement Home the money it needs without destroying its most precious asset.

The area around the home is already one of the most congested, crowded areas of the entire East Coast. The AFRH's 300 acres is a precious jewel of green space and open land. Once developed, the open space will be gone forever.

For all the above reasons, select the no-action alternative.

Then, let's do it right. The Armed Forces Retirement Home must consider alternatives that include open space, parkland, walking trails, gardens, perhaps a national park or historic area.

This could be a true jewel within one of the greatest cities in the world.
We look forward to working with you on the next, great plan for a great asset.

Thank you for your attention.

Sincerely,

John and Ellen Hughes
3656 Park Place N.W.
Washington D.C. 20010
202-545-3999
e-mail: jhughes55@comcast.net

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Latosha Jackson

Address: 438 Newton Pl. N.W

Affiliation:

Phone: (202) 316 1837

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

I too like Mr Douglass who lives 40ft away from Soldiers Home, have sentimental feelings about allowing such a large development to be built. There are lots of kids in this area and the traffic along the side streets will be unbearable. I have lived in this neighborhood 40 yrs and I am sure money can be raised to help the soldiers in another manner. #15

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Amine Jones
Address: 5427 Kansas Ave. NW Washington, DC 20011
Affiliation:
Phone: 202-210-0651

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

As a 19 year old college student that is contemplating joining the armed forces, I think that with the property that they want to develope they should use it for another retirement facility. I know that if I intact decide on joining the armed forces and one day I will intact be a senior, I would want somewhere to go when I am too tired to take care of a house or other property that I might own. This estate was created for veterans, people that have served there country well, I say no construction on the soldiers home. #16

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Timothy A. Jones
Address: 737 Rock Creek Ch Rd NW
Affiliation: ANC 4C08
Phone: (202) 722-0701

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

Return to and Increased Agricultural use of land studies have shown that the most profitable farms are close to urban centers. A certified USDA organic farm will reduce AFRH costs of operation and generate revenue. Green houses & hydroponic gardening can generate year round revenue stream. (NO ~~[illegible]~~) fresh fruits & vegetables can be made available to Washington hospital complex. Additional fish farming can be source of funds as well. #78

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

Dear Mr. Dailey,

Thank you for the opportunity to present my comments on the AFRH Washington Master Plan Draft Environmental Impact Statement (DEIS). My comments on the DEIS are as follows:

1) I) I am AGAINST the development of zone 6. This zone will be the most destructive, both culturally and environmentally speaking. A call for a more thorough assessment of impact to wildlife is in order. To simply say this is an urban area so impact is minimal is absolutely false. All development options were very similar, though OPTION 2 is the WORST.
Option 1, do nothing, would be my choice. But since that is not financially vialbe, there should be an option that provides something for the community. There should be a park or public green space for people, not just 100% development for maximum profit. These plans do not take into consideration the local community, but are designed to benefit outside developers most. #110

2) Some important stakeholders were not on your list of individuals and organizations to whom the DEIS was provided. The District of Columbia Department of Parks and Recreation (DPR) was not served with the DEIS. My understanding is that they did not learn of the draft EIS until July 1 ?
inadequate time to properly respond ? and even then only learned of the DEIS through concerned city residents. The comment period for the DEIS should be extended so that DPR can complete its own comprehensive planning process in a way that can consider potential use of part of the AFRH property to meet city park needs. In addition, it is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the DEIS. Notice of the DEIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for Washington's monumental core or to the superintendent of Rock Creek Parkway. #53

3) The DEIS needs to provide information regarding the exact amount of money that AFRH needs to raise through this development process. Dollar amounts are keep to enabling full public participation.

4) For parcels, or portions of parcels, which have historic significance or character, the development plan must spare them from development, possibly including through alternatives such as land trusts or sale of certain parcels, or portions, for use a parkland. Both options should be added as viable alternatives that allow for revenue but also conservation. #94

5) Retention of all of the existing mature trees in the historic character areas are particularly essential for historic-preservation purposes. All development alternatives must be crafted in such a way as to preserve the mature trees. #91

6) Other true alternatives to the proposed development plan must be explored. The four "alternatives" listed in the DEIS are not really different from one another, but merely slight variations on a single theme. #92

More effort should be made to provide true alternatives with a variety of financial and real estate options to solve the underlying concern ? namely the budget of the AFRH. #92 (continued)

7) The historical importance of the property and maintaining its coherence is overlooked. There should be more detail regarding Section 106 impacts including consideration of knowledgeable sources on the subject, such as Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation.

8) The impact on traffic is vague and unexplored. It requires more details, specifics, and cost information. There is no information about the impact on the community of the number of peak-hour trips suggested in terms of cost to the city of Washington DC to address, the damage to the local infrastructure, and the overall impact on the surrounding community. #223

9) The DEIS mentions any project being in keeping with the neighborhood, but that standard does not actually appear to be consistently applied in the document. That error must be corrected. For example, alternatives 2 and 3A suggest development in Zone 6 that is not at all in keeping with the adjacent neighborhood's architecture. The existing neighborhood is comprised entirely of rowhouse architecture, with a maximum of three stories in height. #129

10) If land is to be developed under "GOV" zoning, then all government building standards must be applied, including the most up-to-date environmental standards. For example, the EIS should detail that any development on GOV-zoned land would have to be GSA LEED certified. #3

11) The draft EIS does not address honestly the fact that the AFRH is proposing extremely dense development of park-like open space in the middle of a neighborhood that is disproportionately low income, elderly, and African American. The density of the proposed development is so high that is likely to adversely the health and well-being (physical and material) of these neighbors. Specifically, the Census tracts adjacent to AFRH on the west have median incomes that place the neighborhood in the lowest 20th percentile for income in the Washington area. These tracts are also 82-90 % African American (compared to 12.4% nationally), with disproportionate percentages of individuals over age 65, below the poverty line, and suffering from disability.

12) The proposed development will have disproportionate negative health effects on minority populations. Specifically, air pollution problems are local as well as regional in scope. The nearby neighborhoods would experience the largest change in air quality from the increased traffic and other pollution sources associated with the proposed development. Further, local air pollution is linked to increased incidence of respiratory illness. Three different recent studies being published this month in Epidemiology find a significant link between daily ground-level ozone in cities and mortality rates in the next 3 days. Ozone is formed when pollutants, such as car exhaust mix with heat and sunlight. Editors of Epidemiology have made the rather unprecedented comment that together these studies point to an "urgent need to reduce public exposure to ambient ozone by all possible means." To that fact must be added that communities of color across the nation are experiencing disproportionately high levels of asthma #192

and other respiratory illness. The deteriorated local air quality will also worsen these health problems in this predominantly African American neighborhood. The heat-retention effect of the loss of current AFRH green space will also promote additional local ground-level ozone formation. Finally, the current mature trees on the AFRH property contribute positively to air quality, particularly in the immediate vicinity of the property. #192 (continued)

13) The EIS does not consider the heat-retention impact that the proposed dramatic replacement of green meadow, lawn and trees with buildings and paved surface will have on temperatures in the surrounding area. The dominant green space on the current AFRH campus has a cooling effect that will be radically altered is heat-retaining buildings, parking lots, and roads are constructed where grass and trees now stand. The increased temperatures will result in higher cooling bills, particularly burdensome for the elderly poor, or an increased frequency of dangerous summer conditions for those who cannot afford air conditioning, again particularly the elderly poor. Increased temperatures will also worsen the impact of the increased automotive exhaust associated with the proposed development by promoting local ground-level ozone formation.

14) At the current time, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality. #185

15) The transportation impact study of the EIS has not considered the impact of increased traffic on side streets between the affected AFRH property and Georgia and New Hampshire Avenues. The impact of the level of increased traffic considered is unlikely to be limited to the main streets currently studied in the EIS. More specifically, the neighborhoods to the west of the AFRH property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The EIS has not considered the impact of increased traffic on loss of recreational services provided by streets in Petworth and Park View. In addition, the District of Columbia government has recognized that there is a serious problem with pedestrian deaths from automobiles on city streets. Bringing a large number of automobiles into narrow residential streets will likely increase the mortality rate in the area to the west of AFRH, particularly because of the relatively large number of elderly and children. #224

16) Many residents in the area to the west of AFRH use their basements for living space or rent them out to gain much needed income. AFRH enjoys the physical advantages of being the third highest point in the District of Columbia. The draft EIS has not considered how dense construction on the AFRH property will change the water table and how this might affect basements in the adjacent, lower lying area. A rise in the water table seems likely to result from dense development on this land. A raised water table could result in a serious damage to the use of basements and a substantial loss in income. #176

17) Both residents of the AFRH and neighbors who live to the west of the Home benefit, much as President Lincoln did when the Anderson

cottage was built, from the relative calm and quiet provided by the green campus of the Home. The EIS notes that the noise level in the are is that usually found in parks. Area residents enjoy being able to walk past the property and to see it's green expanses when looking out their windows or down their streets. In this way, the AFRH has provided area residents with a real source of wealth that improves their quality of life in ways that they could not purchase no matter what their income was. This neighborhood does not seem poor to its residents no matter their income because it does not look like a poor neighborhood. The increased traffic, noise, and loss of green beauty and calm will take away something of irreplaceable value in their lives.

18) Finally, and perhaps most importantly, the DEIS has not adequately taken into account the Federal Elements of the Comprehensive Plan for the National Capital adequately. In particular, there appears to have been an marked inattention to the Parks and Open Element and the Preservation and Historic Features Element. The Parks and Open Space Element of the Comprehensive Plan for the National Capital makes clear that the capital area is facing increasing demand for open space and park due to increase population and tourism pressure. The Element defines open space as "any land or water surface that is not occupied by buildings, a broad definition that encompasses the vast majority of federal property" (p. 3). Under the Park and Open Space Element directs that federal agencies should: **#198**

1. maintain and conserve federal open space as a means of shaping and enhancing urban areas (p. 7); 2. preserve open space that is crucial to the long-term quality of life of a neighborhood or region; 3. Conserve and maintain the essential open space character of areas in the region with significant park, open space cultural or natural qualities that contribute to the setting of the National Capital Region." The Element specifically includes McMillan Reservoir to the immediate south of Zone 5 as an example.
4. "Conserve portions of military reservations that add significantly to the inventory of park, open space, and natural areas and should, to the extent practicable be used by the public for recreation ? [i.e.,] when security considerations permit (p. 8-9)." The Element explicitly includes U.S. Soldier's and Airmen's Home as an example of this.
5. "Maintain and conserve trees and other vegetation in the landscaped buffer areas on federal installations in a natural condition."

The Park and Open Space Element also stresses the importance of connectivity between parks and open spaces in the Capital Region. As already noted, the Element has identified both AFRH and the McMillan Reservoir to its immediate south as areas to be preserved as open space and parkland. Fort Totten to the northeast of AFRH is also an important part of the long-run open space plan for the Capital region. As land is currently configured, links could be made between these three areas through green bikeways. Loss of the AFRH property to development could seriously impair this open space connectivity.

The Parks and Open Space Element highlights the unique role that parks created around historic sites play in the Capital Region. The federal government is to "establish and preserve historic parks as important legacies of national, historic, architectural and landscape significance.

The Anderson cottage and two acres surrounding it have been designated a National Monument because of its importance in Lincoln and other 19th century presidencies. But as the DEIS notes, the importance of the AFRH site does not stop with this. To its immediate north is the first national military cemetery, predating Arlington National Cemetery. The AFRH itself has been in continuous use as a final home for members of the U.S. Armed Services since the middle of the 19th century. It is the U.S. equivalent of Les Invalides in Paris. Its central landscaped core and the agricultural land (now garden) of Zone 6 are essentially unchanged from the 19th century and provide a coherent and important historical context for the National Monument, cemetery and historically important home. The Elements are very clear about the importance of protecting just such landscapes from destruction.

The Parks and Open Space Element of the Federal Plan also commits the federal government to protecting terrain features of the region through careful design. In particular, it notes the importance of maintaining vistas of the Monumental core of L'Enfant's city and protecting the escarpments that provide these overlooks. As the third highest point in the District of Columbia and one of the only undeveloped ones, the AFRH property is one of the areas that falls under the federal government commitment to protect "topographic bowl features."

The Preservation and Historic Features Element of the Comprehensive Plan for the National Capital: Federal Elements complements the Parks and Open Space Element. The Preservation and Historic Features Element is not limited to preservation of historic structures. A major concern is the "preservation and strengthening historic urban design features, such as the L'Enfant Plan." As part of this the Element commits to "protecting the character of the region's natural features, many of which have historical or cultural significance, such as ? the ridge of the topographic bowl, agricultural land, ? and designed landscapes." All of these elements are present on the AFRH property and the alternatives do not seem to adequately take these into account. In particular plans to develop Zones 5 and 6 will disturb historically agricultural land that was an integral part of the function of both AFRH and the Anderson cottage, as well as disrupt the landscape of the topographic bowl. In particular, the Federal Plan calls for the federal government to "protect the skyline formed by the region's natural features, particularly the topographic bowl around central Washington" and to "protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital's image."

The Preservation and Historic Features Federal Elements set policies regarding federal government stewardship of historic properties and the historic plan of Washington, D.C. Under these Elements federal agencies
should:

1. protect the settings of historic properties, including views to and from sites where significant, as integral parts of the historic character of the property (p. 8); 2. protect the reservations that contain historic landscapes and features from incompatible changes or incursion; 3. protect views .. inward from vantage points along the rim of the topographic bowl from inappropriate intrusions. Open space

should be preserved to allow for public use and enjoyment of these views. (Examples include ?the escarpment north of Florida, Ave. NW)..

The Parks and Open Space Element of the Comprehensive Plan for the National
Capital: Federal Elements directs the federal government to look to redevelopment of surplus federal property as a means of adding to the region's inventory of parks and open space and notes that future acquisitions could occur by purchase, easement, donation or exchange. An alternative that has not been included in the EIS is exchange of land in Zones 5 and 6 for other federal surplus land that could be more appropriately developed. Exchanging this land for land in another location and development there could provide needed financial resources for AFRH.
Zones 5 and 6 could then continue to play the important role they currently play in the District's system of federal open space by protecting historic landscapes, providing appropriate context for an important historical site and protecting views of the central core of the capital as directed by the Federal Elements. If the land were transferred to the National Park Service to enlarge the Lincoln Cottage National Monument, this would not only preserve open space but would help protect the historical integrity of the setting for the cottage as a place of retreat and rest, thus preventing the kind of encroachment of inappropriate new development that has so adversely affected the Manassas Battle Field and other major Civil War historic sites. It would also enhance public access to much needed open space in the District as a whole as well as the adjacent neighborhoods. In addition, it may serve to substantially mitigate adverse environmental impacts of development on the eastern Zones 2, 3, and 4.

The District of Columbia Parks and Recreation is currently in the middle of a comprehensive planning process. As part of this effort they are conducting a survey of park and recreation needs indicating a significant deficit of park space in the Petworth, Park View, Columbia Heights area.
The AFRH property is a uniquely large landscaped open space -- one of the few remaining unprotected open space areas in the eastern part of residential Washington DC. The planning process should also be timed to accommodate consideration of the current comprehensive planning process of the D.C. Department of Parks and Recreation.

The location of a park in Zone 6 in the AFRH EIS would be easily accessible to dense development in neighboring Colombia Heights and to planned dense residential development along Georgia Avenue, as well as dense development planned for the rest of the AFRH site. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northwest and northeast D.C. #93

The open space already provided by AFRH is an integral design element of the adjacent Petworth and Park View rowhouse neighborhoods, developed in the early 1900s. Surrounding streets to the west of the Home were designed to take advantage of vistas of the open space provided by the Home's property. For example, the vista from Grant Circle down Illinois Ave to Zone 6 is an important anchoring design element in the eastern part of Petworth. The Preservation Element of

the Federal Elements direct federal agencies to "protect reciprocal views along rights-of-way and from ? circles (p. 11)." Replacing the vista of this green expanse that opens out over a view of the federal core of the city with a view of an eight story apartment building would significant harm the integrity of historic city plan in this part of the capital.

Among the alternatives, the DEIS has not considered alternatives that would provide significant parkland for the neighborhood to the west of AFRH. As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of Soldier's Home were developed in the early 1900s around the presence of the Soldier's Home as open space. #93

Thank you for your consideration of these comments. I am confident that adequate and appropriate consideration of the comments of all affected parties will produce a better end result for AFRH, its residents, and the multitude of other city residents who will be affected by the proposed development.

In addition--the AFRH needs money, but the Washington DC campus is not operating at full capacity. In order to rectify this, the current residents of the AFRH in Gulfport should be relocated to Washington and the entire Gulfport campus should be sold for development. The historical and environmental value of the Washington DC campus clearly makes it the asset to preserve. The historical value of the Gulfport campus is negligible, but its commercial value is great ("The Mississippi Gulf Coast region boasts some of the finest beaches, fishing, casinos, restaurants, resorts, entertainment, shopping, and championship golf courses in the southeast United States." --AFRH web site). Liquidation of the Gulfport campus should therefore yield considerable revenue. #102

In the 21st century it is not fitting for our nation to continue maintenance of redundant unsustainable facilities for the segregation of veterans from Union and Confederate states. In reverent memory of President Lincoln, the Washington DC campus should be preserved and improved for it's original purpose, the care and honor of our veterans from every state, and be rededicated with the opening of the Lincoln Cottage as a monument to the preservation of the Union.

Sincerely,

Christine Kenngott
4017 Illinois Ave, NW
WDC, 20011

cc: Councilman Adrian Fenty
Councilman Jim Graham
The Honorable Eleanor Holmes Norton

438 Crittenden St., NW
Washington, DC 20011

July 6, 2005

Mr. Donald Dailey
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

RE: Armed Forces Retirement Home-Washington (AFRH-W) Master Plan *Draft Environmental Impact Statement* (*DEIS*) Comments – Larson / Maready

Dear Mr. Dailey:

Thank you for the opportunity to present our comments on the Armed Forces Retirement Home-Washington (AFRH-W) Master Plan *Draft Environmental Impact Statement* (*DEIS*). We are deeply concerned about the potential adverse effect of the proposed master plan upon the neighborhood in which we live – Petworth – its potential adverse effect upon other surrounding neighborhoods – such as Park View – as well as what seems to be its certain adverse effect upon the AFRH-W itself. Without thorough, studied, consideration of all of the potential effects caused by the proposed master plan, without carefully considered advice and counsel from both AFRH-W and local neighborhood residents, and without a full examination and presentation of all of the information that is available, we feel that the master plan, as proposed, has the potential to forever compromise the integrity of these National Register-eligible historic resources. After our examination of the *DEIS*, we have a few specific concerns that we would like to have addressed by the AFRH-W in some sort of direct interaction with the local community as well as, most importantly, addressed in the *Final Environmental Impact Statement* (*Final EIS*). Our topics of concern are as follows:

1. First and foremost, there is a dearth of information in the *DEIS* concerning the proposed master plan. We would like to see a much fuller description and explanation. The master plan proposed by the AFRH-W is only presented in the *DEIS* in the vaguest of terms. Maps of the site showing outlined borders of potential development zones, simple square footage estimates, and projected simple financials do not provide the information necessary in order to adequately determine the effect of the proposed master plan upon the historic fabric of the AFRH-W, upon the historic fabric of surrounding neighborhoods, upon surrounding roadways, and upon the local environment. **#17** The AFRH-W issued a Notice of Intent (NOI) to prepare an EIS on August 17, 2004. Realistically, planning for this proposed development must have started well before that date. Even using the most conservatively estimated start-date, however, planning for the proposed development started nearly a year ago. It is simply not credible that, a year into the planning process, the master plan consists only of the information presented to the public in the *DEIS*. More information has to be available, and should be presented to the public. The *DEIS* (and by extension, the *Final EIS*) is useless without inclusion of the full proposed master plan; it seems impossible to make the determinations of effect presented in the *DEIS* with the bare-bones information about the proposed master plan that has been provided. **#17**

2. The Area of Potential Effect (APE), as presented in the *DEIS*, appears to be too small to adequately determine the effect of the proposed master plan upon the National Register-listed and -eligible sites in its vicinity. In addition, the methodology used to determine the boundaries of the APE is neither described nor justified in the text of the *DEIS*. **#155** The boundaries of the APE should be expanded to include the entirety of the National Register-eligible neighborhoods surrounding the AFRH-W, and the methodology used to determine the boundaries of the APE should be described and justified in the text of the *Final EIS*. The boundaries of the APE currently include the National Register-listed and National Historic Landmark U.S. Soldiers' and Airmen's Home, the entire National Register-eligible AFRH-W, and the entire National Register-eligible Park View neighborhood. The APE, however, excludes the majority of the National Register-eligible Petworth neighborhood. It does not seem that an adequate determination of effect for the entire National Register-eligible Petworth neighborhood could have been possible when only a small portion of that neighborhood is included within the boundaries of the APE. The boundaries of the APE should be expanded to include all of Petworth, and a new determination of effect should be prepared to reflect the expanded APE. **#155 (continued)**

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: MICHAEL J. LONGWELL

Address: 3700 N. CAPITOL ST. N.W. WASHINGTON, DC 20011

Affiliation: AFRH-W RESIDENT

Phone: (202) 882-0616

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☑ No

Comments

THE ONE SOLUTION TO SOLVING THE AFRH FINANCIAL PROBLEMS WAS NOT ADDRESSED. THIS SOLUTION WOULD RAISE THE 50¢ A MONTH DEDUCTION FROM ACTIVE DUTY MILITARY (ENLISTED AND WARRANTS) TO $1.50. ($1.50 IS ALREADY AUTHORIZED BUT NOT IMPLEMENTED). THIS SOLUTION WOULD GENERATE AN ADDITIONAL $14 MILLION PER FISCAL YEAR EXCEEDING BY $3 MILLION IN ANY OF THE PROPOSED PLANS. THIS SOLUTION (A VERY VIABLE AND REALISTIC ONE) WOULD GENERATE MORE REVENUE WITHOUT LEASING OR SELLING OF ANY LAND. THIS SOLUTION WOULD BE PAID FOR BY THE VERY SERVICE MEMBERS WHO ONE DAY MAY BE LIVING HERE. (IT MAKES A LOT OF COMMON SENSE) THIS IS A REALISTIC SOLUTION (NOT A POLITICAL ONE). #81

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Elizabeth Nacin

Address: 4007 Illinois Ave, NW

Affiliation: Resident

Phone: 202-722-0240

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

See attached letter

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

Elizabeth Maclin
4007 Illinois Avenue, NW
Washington, D.C. 20011

July 6, 2005

Donald Dailey (donald.dailey@afrh.gov)
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, D.C. 20011

Re: Response to Draft EIS for AFRH-Washington Plan

Dear Mr. Dailey,

Thank you for the opportunity to present my comments on the AFRH Washington Master Plan Draft Environmental Impact Statement (DEIS). My comments on the DEIS are as follows:

Other true alternatives to the proposed development plan must be explored. The four "alternatives" listed in the DEIS are not really different from one another, but merely slight variations on a single theme. More effort should be made to provide true alternatives with a variety of financial and real estate options to solve the underlying concern namely the budget of the AFRH.

The DEIS mentions any project being in keeping with the neighborhood, but that standard does not actually appear to be consistently applied in the document. That error must be corrected. For example, alternatives 2 and 3A suggest development in Zone 6 that is not at all in keeping with the adjacent neighborhood's architecture. The existing neighborhood is comprised entirely of row house architecture, with a maximum of three stories in height.

The historical importance of the property and maintaining its coherence is also overlooked. There should be more detail regarding Section 106 impacts including consideration of knowledgeable sources on the subject, such as Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation. For parcels, or portions of parcels, which have historic significance or character, the development plan must spare them from development, possibly including through alternatives such as land trusts or sale of certain parcels, or portions, for use a parkland. Both options should he added as viable alternatives that allow for revenue but also conservation.

At the current time, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality. Further, retention of all of the existing mature trees in the historic character areas are particularly essential for historic-preservation purposes. All development alternatives should be crafted in such a way as to preserve the mature trees.

The EIS does not consider the heat-retention impact that the proposed dramatic replacement of green meadow, lawn and trees with buildings and paved surface will have on temperatures in the

and the McMillan Reservoir to its immediate south as areas to be preserved as open space and parkland. Fort Totten to the northeast of AFRH is also an important part of the long-run open space plan for the Capital region. As land is currently configured, links could be made between these three areas through green bikeways. Loss of the AFRH property to development could seriously impair this open space connectivity.

The District of Columbia Parks and Recreation is currently in the middle of a comprehensive planning process. As part of this effort they are conducting a survey of park and recreation needs indicating a significant deficit of park space in the Petworth, Park View, Columbia Heights area. The AFRH property is a uniquely large landscaped open space—one of the few remaining unprotected open space areas in the eastern part of residential Washington, D.C. The planning process should also be timed to accommodate consideration of the current comprehensive planning process of the D.C. Department of Parks and Recreation.

Among the alternatives, the DEIS has not considered alternatives that would provide significant parkland for the neighborhood to the west of AFRH. As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of Soldier's Home were developed in the early 1900s around the presence of the Soldier's Home as open space.

Finally, some important stakeholders were not on your list of individuals and organizations to whom the DEIS was provided. The District of Columbia Department of Parks and Recreation (DPR) was not served with the DEIS. My understanding is that they did not learn of the draft EIS until July 1· -inadequate time to properly respond—and even then only learned of the DEIS through concerned city residents. The comment period for the DEIS should be extended so that DPR can complete its own comprehensive planning process in a way that can consider potential use of part of the AFRH property to meet city park needs. In addition, it is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the DEIS. Notice of the DEIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for Washington's monumental core or to the superintendent of Rock Creek Parkway.

Thank you for your consideration of these comments. I am confident that adequate and appropriate consideration of the comments of all affected parties will produce a better end result for AFRH, its residents, and the multitude of other city residents who will be affected by the proposed development.

Sincerely,

Elizabeth Maclin

Elizabeth Maclin

cc: Councilman Adrian Fenty
The Honorable Eleanor Holmes Norton

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Jacquelyn Marlow

Address: 730 Quebec Pl, N.W.

Affiliation: U.A.C.

Phone: (202) 726-4225

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

There should be a balance between the need and the community. The presentation of the proposed building should not contrast what is already established in the neighborhood. This is to say it should not look like down town D.C. China town but that it should blend into the style and fashion of the established neighborhood. #18

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Catherine McCarthy

Address: AFRH-800

Affiliation: --

Phone: 202 541-5797

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

Any thoughts as to the increase in crime to come with the influx of thousands of people working & living on the grounds and what will be done to ensure our safety? #194

Why so many housing units? Are we to become just another small sub-division of DC? #69

What will be the traffic pattern(s) on the home grounds and who will control it. How will the increase in traffic on the grounds, impact foot traffic and those in BPVs? #225

Who will be responsible for the upkeep of the roadways on the home grounds. #226

A 150 year of tradition down the tubes, the military veterans squeezed into a few acres of what is used to be their beautiful and peaceful home. What a shame #5

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Patricia A. McClinton

Address: 638 Otis Pl. NW

Affiliation:

Phone: 202 882 8524

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

I am against #6, put in Rear North Capitol St

#82

Thanks Neighbor

Patricia A McClinton

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

Mr. Wallwork,

I am writing to comment on the draft EIS for the AFRH development proposals. I live with my family in the 600 block of Princeton Place Northwest, about half a block west of the area that now contains the friendship garden. I am sympathetic to the need to generate funds for maintenance and operation of the AFRH but, as a neighbor and a parent, I have concerns about the development proposed. Therefore I request that the development contain a large green space buffer zone between the edge of the property and any housing, commercial, or embassy buildings.

I enjoy views of the AFRH grounds every day. Since the neighborhood has no other parks (other than the small Parkview baseball field at Princeton and Warder), the view is precious. However, the large iron gate separating the AFRH from the neighborhood has always been a source of frustration; we can see the beautiful grounds, but only through bars. My mother used to tell stories of family picnics at the Old Soldiers Home in the 1940s. While I realize that the park grounds will not be wholly opened to the public, I believe the development creates a positive opportunity for permitting the local community to better enjoy the campus. By creating open space accessible to the public between Park Place Northwest and the development, down past the duck pond, the project could accomplish its financial goals while buffering the noise and traffic dangers and adding sorely needed, accessible greenspace. #111

Also, unlike some of my neighbors, I request that if any housing is created, the AFRH require that at least 15% of the units be affordable to low- to moderate-income families. The rapid gentrification of Parkview and Petworth have priced out many potential buyers and renters who grew up in the area and would like homes of their own. I request that preference for these units be given to longterm DC residents. #137

In sum, setting development back from the property line, making a bufferzone park open to all, and requiring a fair number of affordable housing units would make the development of the AFRH a net positive for the surrounding community.

Thank you for considering my comments.

Marion Mollegen McFadden
619 Princeton Place NW
Washington, DC 20010

Donald Dailey
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

Re: Comments on Draft EIS for AFRH-Washington Master Plan

Dear Mr. Dailey,

Thank you for the opportunity to present comments on the Armed Forces Retirement Home (AFRH)-Washington Master Plan Draft Environmental Impact Statement (DEIS). As an initial matter, the United Neighborhood Coalition requests status as a consulting party to the historic-preservation (Section 106) process associated with the AFRH-Washington Master Plan and EIS.

Specific to the DEIS, the United Neighborhood Coalition's comments are below (please note that all references to numbered "zones" use the system established in "Figure 2-1: Proposed Development Zones" of the DEIS):

Comment 1:

Of paramount importance, other true alternatives to the proposed development plan have not been properly explored. The four "alternatives" listed in the DEIS are not really different from one another, but merely slight variations on a single theme. Additional, true alternatives are needed with a variety of financial and real estate options. As a means of mitigating the impact on historic properties, and environmental and social impacts on the immediate neighborhood and larger metropolitan area, and adjacent disproportionately low income, minority, elderly communities the following alternatives should be considered: #92

A) No development on the area west of a line extending north through the AFRH property from First Street, NW. This would buffer adjacent residential neighborhoods to the west from the noise, heat, air pollution, traffic and change in water table that is likely to result from development on the eastern half of the property. It would protect almost all of the currently undisturbed historical landscape and buildings, thereby mitigating the majority of the potential impact on them.

B) Exchange for surplus federal land of land west of a line extending north through the AFRH property from First Street, NW that is not currently actively used for AFRH's mission. The AFRH property described above could then go to the National Park Service for development as public park

space as part of the Lincoln Cottage Soldier's Home National Monument. The land received by AFRH in exchange should be used for revenue generating purposes for the AFRH. The park would provide the environmental, social, and historic preservation mitigation described in alternative "A" above, as well as meeting the park and open space and historic preservation directives of the Federal Elements of the Comprehensive Plan for the National Capital (see below). The surplus land received by AFRH should be such as to provide comparable revenue generation for the AFRH to the most likely, legal land use allowable on the exchanged AFRH property.

C) Sell the land to the west of a line extending north through the AFRH property from First Street, NW that is not currently actively used for AFRH's mission to the District of Columbia for use as city park. This would buffer adjacent residential neighborhoods to the west from the noise, heat, air pollution, traffic and change in water table that is likely to result from development on the eastern half of the property. It would protect almost all of the currently undisturbed historical landscape and buildings as well as meeting the park and open space and historic preservation directives of the Federal Elements of the Comprehensive Plan for the National Capital. The sale would provide some revenue to the AFRH. Civic groups in the Petworth and Park View area are committed to working to find sources of private funding to augment city funding for purchase of the property.

D) Because the AFRH-Washington campus is not operating at full capacity, the current residents of the AFRH facilities in Gulfport could be relocated to Washington and the entire Gulfport campus could be sold for development. The historical and environmental value of the Washington DC campus clearly makes it the asset to preserve. The historical value of the Gulfport campus is negligible, but its commercial value is great ("[t]he Mississippi Gulf Coast region boasts some of the finest beaches, fishing, casinos, restaurants, resorts, entertainment, shopping, and championship golf courses in the southeast United States." -- AFRH web site). Liquidation of the Gulfport campus could therefore yield considerable revenue that would meet AFRH's revenue-generation goals. This option must be considered seriously, and not rejected out-of-hand without full analysis, because long-term preservation of the historic and environmental assets associated with the AFRH-Washington campus outweigh short- to medium-term inconvenience associated with the proposed relocation of AFRH-Gulfport residents. **#102**

Comment 2:

Also of extreme importance, the DEIS has not properly taken into account the Federal Elements of the Comprehensive Plan for the National Capital. In particular, there **#198**

appears to have been an marked inattention to the Parks and Open Element and the Preservation and Historic Features Element. The Parks and Open Space Element of the Comprehensive Plan for the National Capital makes clear that the capital area is facing increasing demand for open space and park due to increase population and tourism pressure. The Element defines open space as "any land or water surface that is not occupied by buildings, a broad definition that encompasses the vast majority of federal property" (p. 3). The Parks and Open Space Element directs that federal agencies should: #198 (con't)

1. maintain and conserve federal open space as a means of shaping and enhancing urban areas (p. 7);

2. preserve open space that is crucial to the long-term quality of life of a neighborhood or region;

3. "Conserve and maintain the essential open space character of areas in the region with significant park, open space cultural or natural qualities that contribute to the setting of the National Capital Region." The Element specifically includes McMillan Reservoir to the immediate south of Zone 5 as an example.

4. "Conserve portions of military reservations that add significantly to the inventory of park, open space, and natural areas and should, to the extent practicable be used by the public for recreation … [i.e.,] when security considerations permit (p. 8-9)." The Element explicitly includes U.S. Soldier's and Airmen's Home as an example of this.

5. "Maintain and conserve trees and other vegetation in the landscaped buffer areas on federal installations in a natural condition."

The Parks and Open Space Element also stresses the importance of connectivity between parks and open spaces in the Capital Region. As already noted, the Element has identified both AFRH and the McMillan Reservoir to its immediate south as areas to be preserved as open space and parkland. Fort Totten to the northeast of AFRH is also an important part of the long-run open space plan for the Capital region. As land is currently configured, links could be made between these three areas through green bikeways. Loss of the AFRH property to development could seriously impair this open space connectivity.

The Parks and Open Space Element highlights the unique role that parks created around historic sites play in the Capital Region. The federal government is to "establish and preserve historic parks as important legacies of national, historic, architectural and landscape significance." The Anderson cottage and two acres surrounding it have been designated a National Monument because of its importance in Lincoln's and other 19th century presidencies. But as the DEIS notes, the importance of the AFRH site does not stop with this. To its immediate north is the first national military cemetery, predating Arlington National Cemetery. The AFRH itself has been in continuous use as a final

home for members of the U.S. Armed Services since the middle of the 19th century. It is the U.S. equivalent of Les Invalides in Paris. Its central landscaped core and the agricultural land (now garden) of Zone 6 are essentially unchanged from the 19th century and provide a coherent and important historical context for the National Monument, cemetery and historically important home. The Elements are very clear about the importance of protecting just such landscapes from destruction.

The Parks and Open Space Element of the Federal Plan also commits the federal government to protecting terrain features of the region through careful design. In particular, it notes the importance of maintaining vistas of the Monumental core of L'Enfant's city and protecting the escarpments that provide these overlooks. As the third highest point in the District of Columbia and one of the only undeveloped ones, the AFRH property is one of the areas that falls under the federal government commitment to protect "topographic bowl features."

The Preservation and Historic Features Element of the "Comprehensive Plan for the National Capital: Federal Elements" complements the Parks and Open Space Element. The Preservation and Historic Features Element is not limited to preservation of historic structures. A major concern is the "preservation and strengthening of historic urban design features, such as the L'Enfant Plan." As part of this, the Element commits to "protecting the character of the region's natural features, many of which have historical or cultural significance, such as … *the ridge of the topographic bowl, agricultural land, … and designed landscapes*." All of these elements are present on the AFRH property and the alternatives do not adequately take these into account. In particular, plans to develop Zones 5 and 6 will disturb historically agricultural land that was an integral part of the function of both AFRH and the Anderson cottage, as well as disrupt the landscape of the topographic bowl. Also of importance, the Federal Plan calls for the federal government to "protect the skyline formed by the region's natural features, particularly the topographic bowl around central Washington" and to "protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital's image."

The Preservation and Historic Features Federal Elements set policies regarding federal government stewardship of historic properties and the historic plan of Washington, D.C. Under these Elements, federal agencies should:

1. protect the settings of historic properties, including views to and from sites where significant, as integral parts of the historic character of the property (p. 8);

2. protect the *reservations that contain historic landscapes and features from incompatible changes or incursion* (emphasis added);

3. protect views .. *inward from vantage points along the rim of the topographic bowl from inappropriate intrusions. Open space should be*

preserved to allow for public use and enjoyment of these views. (Examples include ... the escarpment north of Florida Avenue, NW) (emphasis added).

The Parks and Open Space Element of the "Comprehensive Plan for the National Capital: Federal Elements" directs the federal government to look to redevelopment of surplus federal property as a means of adding to the region's inventory of parks and open space and notes that future acquisitions could occur by purchase, easement, donation or exchange. As noted above, an alternative that has not been included in the EIS is exchange of land in Zones 5 and 6 for other federal surplus land that could be more appropriately developed. Exchanging this land for land in another location and development there could provide needed financial resources for AFRH. Zones 5 and 6 could then continue to play the important role they currently play in the District's system of federal open space by protecting historic landscapes, providing appropriate context for an important historical site and protecting views of the central core of the capital as directed by the Federal Elements. If the land were transferred to the National Park Service to enlarge the Lincoln Cottage National Monument, this would not only preserve open space but would help protect the historical integrity of the setting for the cottage as a place of retreat and rest, thus preventing the kind of encroachment of inappropriate new development that has so adversely affected the Manassas Battle Field and other major Civil War historic sites. It would also enhance public access to much needed open space in the District as a whole as well as the adjacent neighborhoods. In addition, it may serve to substantially mitigate adverse environmental impacts of development on the eastern Zones 2, 3, and 4.

In addition, the open space already provided by AFRH is an integral design element of the adjacent Petworth and Park View rowhouse neighborhoods, developed in the early 1900's. Surrounding streets to the west of the Home were designed to take advantage of vistas of the open space provided by the Home's property. For example, the vista from Grant Circle down Illinois Avenue to Zone 6 is an important anchoring design element in the eastern part of Petworth. The Preservation Element of the Federal Elements direct federal agencies to "protect reciprocal views along rights-of-way and from ... circles (p. 11)." Replacing the vista of this green expanse that opens out over a view of the federal core of the city with a view of an eight story apartment building would significant harm the integrity of historic city plan in this part of the capital.

Comment 3:

The District of Columbia Parks and Recreation is currently in the middle of a comprehensive planning process. As part of this effort they are conducting a survey of park and recreation needs indicating a significant deficit of park space in the Petworth, Park View, and Columbia Heights area. The AFRH property is a uniquely large landscaped open space -- one of the few remaining unprotected open space areas in the eastern part of residential Washington DC. The planning process for development of AFRH property should be timed to accommodate consideration of the current comprehensive planning process of the D.C. Department of Parks and Recreation (see also Comment 4 below).

The location of a park in Zone 6 of the AFRH property would be easily accessible to dense development in neighboring Colombia Heights and to planned dense residential development along Georgia Avenue, as well as dense development planned for the rest of the AFRH site. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northwest and northeast D.C.

Among the alternatives, the DEIS has not considered alternatives that would provide significant parkland for the neighborhood to the west of AFRH (additional alternatives that would do so are proposed in the first comment of this submission). As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of AFRH were developed in the early 1900s around the presence of the "Soldiers' Home" as open space. #93

Comment 4:

Some important stakeholders were not on your list of individuals and organizations to whom the DEIS was provided. This procedural flaw has resulted in an adequate consultation process regarding the DEIS. For example, the District of Columbia Department of Parks and Recreation (DPR) was not served with the DEIS. Our understanding is that DPR did not learn of the DEIS until July 1, *i.e.*, two working days before the deadline for comments on the DEIS – inadequate time to properly respond – and even then DPR only learned of the DEIS through concerned city residents. The comment period for the DEIS should be extended so that DPR can adequately consider potential use of part of the AFRH property to meet city park needs. In addition, it is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the DEIS. Notice of the DEIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for Washington's monumental core or to the superintendent of Rock Creek Parkway. #53

Comment 5:

As a matter of law, we must question the accuracy of the DEIS's characterization that AFRH parcels leased for development (instead of being sold) would remain subject to "GOV" zoning, rather than be subject to the District of Columbia's municipal commercial/residential zoning. We maintain that the uses proposed in the Master Plan documents are not inherently governmental in nature and, therefore, that D.C.'s municipal commercial/residential zoning authority would apply regardless of whether the land is leased or sold. #19

Comment 6:

The DEIS does not address forthrightly the fact that the AFRH is proposing very dense development on park-like open space in the middle of a neighborhood that is disproportionately low income, elderly, and African American. The density of the proposed development is so high that is likely to adversely the health and well-being

(physical and material) of these neighbors. Specifically, the Census tracts adjacent to AFRH on the west have median incomes that place the neighborhood in the lowest 20th percentile for income in the Washington area. These tracts are also 82-90 % African American (compared to 12.4% nationally), with disproportionate percentages of individuals over age 65, below the poverty line, and suffering from disability.

Comment 7:

The proposed development will have disproportionate negative health effects on minority populations. Specifically, air pollution problems are local as well as regional in scope. The nearby neighborhoods would experience the largest change in air quality from the increased traffic and other pollution sources associated with the proposed development. Further, local air pollution is linked to increased incidence of respiratory illness. Three different recent studies being published this month in *Epidemiology* find a significant link between daily ground-level ozone in cities and mortality rates in the next 3 days. Ozone is formed when pollutants, such as car exhaust mix with heat and sunlight. Editors of *Epidemiology* have made the rather unprecedented comment that together these studies point to an "urgent need to reduce public exposure to ambient ozone by all possible means." To that fact must be added that communities of color across the nation are experiencing disproportionately high levels of asthma and other respiratory illness. The deteriorated local air quality from the proposed AFRH development would worsen such health problems in this predominantly African American neighborhood. The heat-retention effect of the loss of current AFRH green space would also promote additional local ground-level ozone formation. Finally, the current mature trees on the AFRH property contribute positively to air quality, particularly in the immediate vicinity of the property – those mature trees must be retained to minimize negative health impacts from development. #192

Comment 8:

The EIS does not consider the heat-retention impact that the proposed dramatic replacement of green meadow, lawn and trees with buildings and paved surface will have on temperatures in the surrounding area. The dominant green space on the current AFRH campus has a cooling effect that will be radically altered if heat-retaining buildings, parking lots, and roads are constructed where grass and trees now stand. The increased temperatures will result in higher cooling bills, particularly burdensome for the elderly poor, or an increased frequency of dangerous summer conditions for those who cannot afford air conditioning, again particularly the elderly poor. Increased temperatures will also worsen the impact of the increased automotive exhaust associated with the proposed development by promoting local ground-level ozone formation. The EIS must consider the specific impact of loss of trees on the property on area temperature and air quality. #173

Comment 9:

The impact on traffic is vague and unexplored. It requires more details, specifics, and cost information. There is no information about the impact on the community of the #223

number of peak-hour trips suggested in terms of cost to the city of Washington DC to address, the damage to the local infrastructure, and the overall impact on the surrounding community. #223 (continued)

In particular, the transportation-impact portion of the DEIS has not considered the impact of increased traffic on side streets between the affected AFRH property and Georgia and New Hampshire Avenues. The impact of the level of increased traffic considered is unlikely to be limited to the main streets currently studied in the DEIS. Here is one example of an unaddressed impact: the neighborhoods to the west of the AFRH property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The DEIS has not considered the impact of increased traffic on loss of recreational opportunities provided by streets in Petworth and Park View. In addition, the District of Columbia government has recognized that there is a serious problem with pedestrian deaths from automobiles on city streets. Bringing a larger number of automobiles into narrow residential streets will likely increase the mortality rate in the area to the west of AFRH, particularly because of the relatively large number of elderly and children. #224

Comment 10:

Many residents in the area to the west of AFRH use their basements for living space or rent them out to gain much needed income. AFRH enjoys the physical advantages of being the third highest point in the District of Columbia. The DEIS has not considered how dense construction on the AFRH property will change the water table and how this might affect basements in the adjacent, lower lying area. A rise in the water table seems likely to result from dense development on this land. A raised water table could result in a serious damage to the use of basements and a substantial loss in income. #176

Comment 11:

Both residents of the AFRH and neighbors who live to the west of the Home benefit, much as President Lincoln did when the Anderson cottage was built, from the relative calm and quiet provided by the green campus of the Home. The EIS notes that the noise level in the area is that usually found in parks. Area residents enjoy being able to walk past the property and to see its green expanses when looking out their windows or down their streets. In this way, the AFRH has provided area residents with a real source of wealth that improves their quality of life in ways that they could not purchase no matter what their income was. This neighborhood does not seem poor to its residents regardless of their income – because the proximity of natural beauty means that it does not look like a poor neighborhood. The increased traffic, noise, and loss of green beauty and calm will take away something of irreplaceable value in residents' lives.

Comment 12:

The DEIS needs to provide information regarding the exact amount of money that AFRH needs to raise through this development process. Specificity and transparency with regard to dollar amounts (including the calculations used to arrive at those amounts) are

key to enabling full and meaningful public participation in an assessment of viable alternatives.

Comment 13:

For any parcels ("zones"), or portions of parcels, which have historic significance or character, the development plan must spare the historic portions from development, possibly including through alternatives such as land trusts or exchange or sale of certain parcels, or portions, for use as parkland, as outlined above. Preservation-enabling options must be added as alternatives in ways that allow for both revenue generation and conservation. #94

Comment 14:

Retention of all of the existing mature trees in the historic character areas is particularly essential for historic-preservation purposes, among other essential goals (see also above). All development alternatives must be crafted in such a way as to preserve the mature trees. #91

Comment 15:

The historical importance of the property and maintaining its coherence is overlooked. There should be more detail regarding Section 106 impacts including consideration of knowledgeable sources on the subject, such as Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation.

Comment 16:

The DEIS mentions any project being in keeping with the neighborhood, but that standard does not actually appear to be consistently applied in the document. That error must be corrected. For example, alternatives 2 and 3A suggest development in Zone 6 that is not at all in keeping with the adjacent neighborhood's architecture. The existing neighborhood is comprised entirely of rowhouse architecture, with a maximum of three stories in height. #129

Comment 17:

Assuming *arguendo* that AFRH parcels are developed under "GOV" zoning, then all U.S. government building standards must be applied, including the most up-to-date environmental standards. The EIS must detail the standards to be applied, *e.g.*, that any development on GOV-zoned land would have to be GSA LEED certified. #3

Thank you for your consideration of these comments. I am confident that adequate and appropriate consideration of the comments of all affected parties will produce a better end result for AFRH, its residents, and the multitude of other residents of Washington, D.C., who will be affected by the proposed development.

Sincerely,

Andrew J. McGilvray
President, United Neighborhood Coalition

cc: Councilmember Adrian Fenty
Councilmember Jim Graham
The Honorable Eleanor Holmes Norton

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Amy McLaughlin

Address: 215 V Avenue St. NW WDC 20011

Affiliation: Neighbor

Phone: 202-545-0089

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

Please rework your plan to consider a park, running/biking path + green spaces that would be accessible to neighbors. I would be willing to pay an annual fee to have access to this land as I am sure others would. This could be a potential source of revenue. #80

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: J DAHL Murphy
Address: 424 Randolph ST NW
Affiliation: N/A
Phone: 202-291-4814

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments:

I think our Congress & Representatives should SUPPORT our RETIRED TROOPS!! That the AFRH is Low on money is unconscionable (sp)

Suggest Congress put the home's support in the US yearly Budget

#113

Do NOT support development by Any part of the home and therefore want Alternative #1 to take effect.

Do NOT Touch this historic site for the Greed of developers & real estate moguls

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

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For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

Dear Mr. Dailey,

Thank you for the opportunity to present my comments on the AFRH Washington Master Plan Draft Environmental Impact Statement (DEIS). My comments on the DEIS are as follows:

1) Some important stakeholders were not on your list of individuals and organizations to whom the DEIS was provided. The District of Columbia Department of Parks and Recreation (DPR) was not served with the DEIS. My understanding is that they did not learn of the draft EIS until July 1 ?
inadequate time to properly respond ? and even then only learned of the DEIS through concerned city residents. The comment period for the DEIS should be extended so that DPR can complete its own comprehensive planning process in a way that can consider potential use of part of the AFRH property to meet city park needs. In addition, it is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the DEIS. Notice of the DEIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for Washington's monumental core or to the superintendent of Rock Creek Parkway. #53

2) The DEIS needs to provide information regarding the exact amount of money that AFRH needs to raise through this development process. Dollar amounts are keep to enabling full public participation.

3) For parcels, or portions of parcels, which have historic significance or character, the development plan must spare them from development, possibly including through alternatives such as land trusts or sale of certain parcels, or portions, for use a parkland. Both options should be added as viable alternatives that allow for revenue but also conservation.

4) Retention of all of the existing mature trees in the historic character areas are particularly essential for historic-preservation purposes. All development alternatives must be crafted in such a way as to preserve the mature trees. #91

5) Other true alternatives to the proposed development plan must be explored. The four "alternatives" listed in the DEIS are not really different from one another, but merely slight variations on a single theme. More effort should be made to provide true alternatives with a variety of financial and real estate options to solve the underlying concern ? namely the budget of the AFRH. #92

6) The historical importance of the property and maintaining its coherence is overlooked. There should be more detail regarding Section
106 impacts including consideration of knowledgeable sources on the subject, such as Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation.

7) The impact on traffic is vague and unexplored. It requires more details, specifics, and cost information. There is no information about the impact on the community of the number of peak-hour trips suggested in terms of cost to the city of WashingtonDC to address, the #224

damage to the local infrastructure, and the overall impact on the surrounding community. #223 (continued)

8) The DEIS mentions any project being in keeping with the neighborhood, but that standard does not actually appear to be consistently applied in the document. That error must be corrected. For example, alternatives 2 and 3A suggest development in Zone 6 that is not at all in keeping with the adjacent neighborhood's architecture. The existing neighborhood is comprised entirely of rowhouse architecture, with a maximum of three stories in height. #129

9) If land is to be developed under "GOV" zoning, then all government building standards must be applied, including the most up-to-date environmental standards. For example, the EIS should detail that any development on GOV-zoned land would have to be GSA LEED certified. #3

10) The draft EIS does not address honestly the fact that the AFRH is proposing extremely dense development of park like open space in the middle of a neighborhood that is disproportionately low income, elderly, and African American. The density of the proposed development is so high that is likely to adversely the health and well being (physical and material) of these neighbors. Specifically, the Census tracts adjacent to AFRH on the west have median incomes that place the neighborhood in the lowest 20th percentile for income in the Washingtonarea. These tracts are also 82-90 % African American (compared to 12.4% nationally), with disproportionate percentages of individuals over age 65, below the poverty line, and suffering from disability.

11) The proposed development will have disproportionate negative health effects on minority populations. Specifically, air pollution problems are local as well as regional in scope. The nearby neighborhoods would experience the largest change in air quality from the increased traffic and other pollution sources associated with the proposed development.
Further, local air pollution is linked to increased incidence of respiratory illness. Three different recent studies being published this month in Epidemiology find a significant link between daily ground-level ozone in cities and mortality rates in the next 3 days. Ozone is formed when pollutants, such as car exhaust mix with heat and sunlight. Editors of Epidemiology have made the rather unprecedented comment that together these studies point to an "urgent need to reduce public exposure to ambient ozone by all possible means." To that fact must be added that communities of color across the nation are experiencing disproportionately high levels of asthma and other respiratory illness. The deteriorated local air quality will also worsen these health problems in this predominantly African American neighborhood. The heat-retention effect of the loss of current AFRH green space will also promote additional local ground-level ozone formation. Finally, the current mature trees on the AFRH property contribute positively to air quality, particularly in the immediate vicinity of the property. #192

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surrounding area. The dominant green space on the current AFRH campus has a cooling effect that will be radically altered is heat-retaining buildings, parking lots, and roads are constructed where grass and trees now stand. The increased temperatures will result in higher cooling bills, particularly burdensome for the elderly poor, or an increased frequency of dangerous summer conditions for those who cannot afford air conditioning, again particularly the elderly poor. Increased temperatures will also worsen the impact of the increased automotive exhaust associated with the proposed development by promoting local ground-level ozone formation. #173 (continued)

13) At the current time, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality.

14) The transportation impact study of the EIS has not considered the impact of increased traffic on side streets between the affected AFRH property and Georgiaand New Hampshire Avenues. The impact of the level of increased traffic considered is unlikely to be limited to the main streets currently studied in the EIS. More specifically, the neighborhoods to the west of the AFRH property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The EIS has not considered the impact of increased traffic on loss of recreational services provided by streets in Petworth and Park View. In addition, the District of Columbiagovernment has recognized that there is a serious problem with pedestrian deaths from automobiles on city streets. Bringing a large number of automobiles into narrow residential streets will likely increase the mortality rate in the area to the west of AFRH, particularly because of the relatively large number of elderly and children. #224

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neighborhood. The increased traffic, noise, and loss of green beauty and calm will take away something of irreplaceable value in their lives.

17) Finally, and perhaps most importantly, the DEIS has not adequately taken into account the Federal Elements of the Comprehensive Plan for the National Capital adequately. In particular, there appears to have been an marked inattention to the Parks and Open Element and the Preservation and Historic Features Element. The Parks and Open Space Element of the Comprehensive Plan for the National Capital makes clear that the capital area is facing increasing demand for open space and park due to increase population and tourism pressure. The Element defines open space as "any land or water surface that is not occupied by buildings, a broad definition that encompasses the vast majority of federal property" (p. 3). Under the Park and Open Space Element directs that federal agencies
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Armed Services since the middle of the 19th century. It is the U.S.equivalent of Les Invalides in Paris. Its central landscaped core and the agricultural land (now garden) of Zone 6 are essentially unchanged from the 19th century and provide a coherent and important historical context for the National Monument, cemetery and historically important home. The Elements are very clear about the importance of protecting just such landscapes from destruction.

The Parks And Open Space Element of the Federal Plan also commits the federal government to protecting terrain features of the region through careful design. In particular, it notes the importance of maintaining vistas of the Monumental core of L'Enfant's city and protecting the escarpments that provide these overlooks. As the third highest point in the District of Colombia and one of the only undeveloped ones, the AFRH property is one of the areas that falls under the federal government commitment to protect "topographic bowl features."

The Preservation and Historic Features Element of the Comprehensive Plan for the National Capital: Federal Elements complements the Parks and Open Space Element. The Preservation and Historic Features Element is not limited to preservation of historic structures. A major concern is the "preservation and strengthening historic urban design features, such as the L'Enfant Plan." As part of this the Element commits to "protecting the character of the region's natural features, many of which have historical or cultural significance, such as ? the ridge of the topographic bowl, agricultural land, ? and designed landscapes." All of these elements are present on the AFRH property and the alternatives do not seem to adequately take these into account. In particular plans to develop Zones 5 and 6 will disturb historically agricultural land that was an integral part of the function of both AFRH and the Andersoncottage, as well as disrupt the landscape of the topographic bowl. In particular, the Federal Plan calls for the federal government to "protect the skyline formed by the region's natural features, particularly the topographic bowl around central Washington" and to "protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital's image."

The Preservation and Historic Features Federal Elements set policies regarding federal government stewardship of historic properties and the historic plan of Washington, D.C. Under these Elements federal agencies
should:

1. protect the settings of historic properties, including views to and from sites where significant, as integral parts of the historic character of the property (p. 8);

2. protect the reservations that contain historic landscapes and features from incompatible changes or incursion;

3. protect views .. inward from vantage points along the rim of the topographic bowl from inappropriate intrusions. Open space should be preserved to allow for public use and enjoyment of these views. (Examples include ?the escarpment north of Florida. Ave. NW)..

The Parks and Open Space Element of the Comprehensive Plan for the National Capital: Federal Elements directs the federal government to look to redevelopment of surplus federal property as a means of adding to the region's inventory of parks and open space and notes that future acquisitions could occur by purchase, easement, donation or exchange. An alternative that has not been included in the EIS is exchange of land in Zones 5 and 6 for other federal surplus land that could be more appropriately developed. Exchanging this land for land in another location and development there could provide needed financial resources for AFRH. Zones 5 and 6 could then continue to play the important role they currently play in the District's system of federal open space by protecting historic landscapes, providing appropriate context for an important historical site and protecting views of the central core of the capital as directed by the Federal Elements. If the land were transferred to the National Park Service to enlarge the Lincoln Cottage National Monument, this would not only preserve open space but would help protect the historical integrity of the setting for the cottage as a place of retreat and rest, thus preventing the kind of encroachment of inappropriate new development that has so adversely affected the Manassas Battle Field and other major Civil War historic sites. It would also enhance public access to much needed open space in the District as a whole as well as the adjacent neighborhoods. In addition, it may serve to substantially mitigate adverse environmental impacts of development on the eastern Zones 2, 3, and 4.

The District of Columbia Parksand Recreation is currently in the middle of a comprehensive planning process. As part of this effort they are conducting a survey of park and recreation needs indicating a significant deficit of park space in the Petworth, Park View, Columbia Heightsarea.
The AFRH property is a uniquely large landscaped open space -- one of the few remaining unprotected open space areas in the eastern part of residential WashingtonDC. The planning process should also be timed to accommodate consideration of the current comprehensive planning process of the D.C. Department of Parks and Recreation.

The location of a park in Zone 6 in the AFRH EIS would be easily accessible to dense development in neighboring ColombiaHeightsand to planned dense residential development along Georgia Avenue, as well as dense development planned for the rest of the AFRH site. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northwest and northeast D.C. #93

The open space already provided by AFRH is an integral design element of the adjacent Petworth and Park View rowhouse neighborhoods, developed in the early 1900s. Surrounding streets to the west of the Home were designed to take advantage of vistas of the open space provided by the Home's property. For example, the vista from Grant Circledown Illinois Aveto Zone 6 is an important anchoring design element in the eastern part of Petworth. The Preservation Element of the Federal Elements direct federal agencies to "protect reciprocal views along rights-of-way and from ? circles (p. II)." Replacing the vista of this green expanse that opens out over a view of the federal core of the city with a view of an eight story apartment building would significant harm the integrity of historic city plan in this part of the capital.

Among the alternatives, the DEIS has not considered alternatives that would provide significant parkland for the neighborhood to the west of AFRH. As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of Soldier's Home were developed in the early 1900s around the presence of the Soldier's Home as open space. #93

Thank you for your consideration of these comments. I am confident that adequate and appropriate consideration of the comments of all affected parties will produce a better end result for AFRH, its residents, and the multitude of other city residents who will be affected by the proposed development.

Sincerely,

David Ramsegrouw

1110 Fairmont St. NW

Washington, DC 20009

cc: Councilman Jim Graham

July 6, 2005

Donald Dailey (donald.dailey@afrh.gov)
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

Dear Mr. Dailey:

I am writing to take advantage of the brief period allowed for comments on the Armed Forces Retirement Home Draft Environmental Impact Statement (EIS). I fully support the need to sustain the Armed Forces Retirement Home, but feel that the document presents over-development as the only option to achieve this goal. A combination of other profit-bearing initiatives with more modest development would mobilize the financing required by the Home without jeopardizing the integrity of the land that surrounds it. I am particularly concerned that the financing alternatives eliminated from the detailed study (section 2.2, p. 2-15) were not given full consideration and I am requesting that they be revisited. In addition, I would also like to encourage the Armed Forces Retirement Home to examine other options that may yet to have been considered. Among those mentioned at the June 22 meeting were: requesting U.S. Congress to create a line item and support for recurrent funding; examining opportunities to exchange land with the DC government; environmental easements; establishing a land trust, etc. I or another member of the community would welcome the opportunity to help explore these or other options with you. #143

In addition, I would like to highlight that per the findings from the draft EIS, the development will not contribute to or achieve the stated objectives.

- One of the draft EIS objectives indicates that the Master Plan will *"preserve and improve the essential components of the AFRH-W for residents and the community"* However, most EIS findings indicate *minimal negative impact* on diverse aspects of the environment, indicating few or any areas where the options contribute positively. In general, it appears the draft EIS falls short in showing improvement and preservation of the historical value, the environment, and the city's absorptive capacity. #25
  - While the AFRH may be preserving some of the historic buildings, the plan appears to ignore the overall historic integrity as it does not reflect or consider the value of preserving the surroundings to these historic buildings. As stated at the June 22 meeting, development will permanently change the historic value unique to the AFRH. In addition, the proposal appears to be inconsistent with existing architecture and therefore not preserving the historic quality of the community. For example, while the draft claims that options will be consistent with neighboring architecture, the plans propose buildings (6-8 stories). This is NOT consistent with the existing architecture. #216
  - Environment: It does not appear that the draft EIS sufficiently considered either green development approaches or the cumulative effect of the AFRH development and the already approved nearby development on the community and broader environment. It also appears that traffic and air quality impact were underestimated. #168
  - Absorptive capacity of DC infrastructure. It is of huge concern that the DC police department is already operating with limited resources. I am concerned that the capacity of the DC infrastructure to absorb increased demands has not been adequately considered. Similarly, the lack of a nearby metro station will result in an already taxed road system being to be further overburdened. #196

- According to the draft EIS, the Master Plan will *"Grow the Trust Fund to not only meet the needs of today's residents, but the needs of future generations as well"* It does not appear that the EIS has adequately addressed quality of life needs of the current residents nor the long term requirements of the AFRH to meet the future (and likely growing) needs of veterans. (Again, I refer to the thoughtful comments of our veterans and concerned community on this matter). This should be the real goal of any proposal and I would encourage their current and future needs to be elevated to the highest priority. #26

- Although, the Master Plan indicates it will *"Attract development, at fair market value, that is compatible with the mission of the AFRH"*, I am concerned that fair market value does not take into account the need for low income housing or the need to maintain the wonderful diversity of the community. The environmental justice findings indicate that low income and minority populations would not be disproportionately affected by impacts of the alternatives. However, there appear to be no benefits to these groups in terms of housing options. Furthermore, I would like clarification as to how residential housing, retail, and office buildings are "compatible with the mission of the AFRH." #27

- Lastly, contrary to the stated objective of ensuring *"an open, participatory process with the AFRH-W residents and the community"*, I do not feel that the community was given the sufficient time or information needed to actively participate in this process and question the earnestness of the AFRH's intent to engage the community in this process. Few of us knew of the June 22 meeting and even fewer of any prior steps. I refer to the many written and voiced comments supporting this concern. I would like the AFRH to extend and open this process and would also like to ensure that from here out, the AFRH be more transparent and take more active steps to ensure stakeholder participation. I would also like to ensure that a community representative participate in all meetings and that minutes and updates be shared monthly. #58

In addition to and support of the above mentioned concerns, I would like the AFRH Master Plan and EIS drafters to:

- improve transparency: ensuring community representation and monthly updates
- consider and address additional options: non development, more conservative development options and combinations of several development and nondevelopment options #59
- provide three dimensional mapping of proposal
- conduct a rigorous and unbiased parking and traffic study that considers nearby approved development
- share the financial report of AFRH that shows how much revenue is required and how much will be generated with these and other options
- share the projected capacity needs of AFRH (in terms of space and growing numbers of veterans ensuring that quality of life is NOT compromised) #46
- describe the EIS process in terms of participation and transparency and conduct a survey of stakeholders to measure their perspective of the process thus far. #59
- detail how the options will be consistent with surroundings

Thank you again for the opportunity to provide comments on the draft EIS. I look forward to your consideration of and response to my concerns and comments.

Sincerely,

Leslie Palykewich

312 Shepherd Street, NW
Washington, DC 20011

Cc: Congresswoman Eleanor Holmes Norton
Linda W. Cropp, Council Chair, Council of the District of Columbia
Jack Evans, Chair Pro Tempore
Jim Graham, Ward One
Adrian Fenty, Ward Four
Vincent Orange, Ward Five

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Marcel Prather

Address: 413 Quincy St. N.W.

Affiliation: Resident

Phone: (202) 726-1677

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☐ Yes ☑ No

Comments

As do many of my neighbors, I find it hard to accept that alternatives which went run the very nature of the Soldiers Home as a retirement community and take away one of D.C.'s few remaining open spaces have all been explored.

I also am convinced that no matter which of these development projects is selected, noise and traffic will impact the surrounding neighborhoods profoundly. #28

I urge the planning committee to consider the negative impact all of these development scenarios will have on both the Soldiers Home Residents and our neighborhoods.

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH-W
July 4, 2005

Subject: E.I.S. AFRH-W

To: Donald Dailey
AFRH-W

The suggested plan To destroy The Home is ridiculas. The prepose purpace of The plan is To raise money To pump up The AFRH fund. This is neither desirable or nedessary. #117 There would be no shortage of funds if non-disabled Veterans were no longer accepted as residents. There would be no shortage of funds if A reasonable usees fee were assessed each Resident

The deaft EIS was prepared by A idiot who sees no Social Impacts. Removing security And causing A Thousand elderly persons To Live in A high crime Area is A extreme Social Impact.

The entire AFRH-W Area is on The grounds of The former Soldiers Home, A True National Treasure, a

Reconised Monument. To destroy This Treasure To save a few deadbeats a few dollars is disgusting.

The C.O.O. has been authorized by Congress To adjust The users fee from Time To Time. He has never made any attempt To do This, or require Residents To make a maximum effort To pay Their own way. His anser is To distroy The Home.

Preposed plans 2, 3 and 4 call for institutional development in The area around The Sheridan building. #29
This opens a whole can of worms. Institutional can be anything from a prison To a Insane Asylum.

Twice in The last two years Mr. Cox has unsuccessfully attempted To Move hundreds of homeless Veterans on To home grounds. I have No doubt what he has in mind for institutional use.

In summary, The only sane option is alternative #1. This will preserve a National Monument

And continue to offer security
To the elderly Residents
Alternatives 2, 3 and 4 favors
no one except the developers and
the army of homeless Veterans who
expect someone else To pay
their way.

George C Quick
U.S. AFRH 942
3700 N. Capitol, NW
Wash. DC. 20011-8400

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Jonisha Richardson

Address: P.O. Box 75164 Washington, DC 20013

Affiliation: Advisory Neighborhood Commissioner 1A08

Phone: (202) 246-1707

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

I am a resident of Columbia Heights on Princeton Pl, NW. I ask that the EIS look into having a public park instead of selling the land to developers. #30

I also ask that the community have a strong voice in the development of the land.

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Allison Shelley

Address: neighbor

Affiliation: 628 Otis Pl. NW, 20010

Phone: 202-262-3152

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

Please reconsider forever changing the historic open nature of this valuable piece of property - one of the very few green spaces left in our city, as well as a historically significant landmark. Surely there are more environmentally responsible ways to raise the needed funds. #32

Judging by the comments made at the public hearing, it seems that neighbors and home residents have not been consulted about any of these plans before they were created.

Let's take some time here.

It seems reasonable to assess the resources available - including gov. grants & subsidies for the preservation of open green spaces, before launching into massive, irreversible development that does not enhance the community w/needed parks, etc. but surely promises to worsen traffic & parking issues in the neighborhood.

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
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AFRH

Protecting Those Who Protected the Nation

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: JOSEPHINE J DOBOLESKI

Address: AFRH-W, 403

Affiliation: RESIDENT OF AFRH-W

Phone: 202-722-1803

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

1. SECURITY ?
2. SAFETY ?
3. SERENITY ?

#79

FOR SUCH A "VAST" UNDERTAKING - ARE THESE TRULY A PART OF THE "MASTER PLAN". I [redacted] HOPE SO.

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

Donald Dailey
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

Re: Response to Draft EIS for AFRH-Washington Plan

Dear Mr. Dailey,

Thank you for the opportunity to present my comments on the AFRH Washington Master Plan Draft Environmental Impact Statement (DEIS). I am aware that I am utilizing a form letter but this letter captures my concerns regarding the proposed plan for the AFRH. I do not support the development of Zone 6 and the high density development proposed for the other zones. My comments on the DEIS are as follows:

1) Some important stakeholders were not on your list of individuals and organizations to whom the DEIS was provided. The District of Columbia Department of Parks and Recreation (DPR) was not served with the DEIS. My understanding is that they did not learn of the draft EIS until July 1 – inadequate time to properly respond and even then only learned of the DEIS through concerned city residents. The comment period for the DEIS should be extended so that DPR can complete its own comprehensive planning process in a way that can consider potential use of part of the AFRH property to meet city park needs. In addition, it is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the DEIS. Notice of the DEIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for Washington's monumental core or to the superintendent of Rock Creek Parkway.

2) The DEIS needs to provide information regarding the exact amount of money that AFRH needs to raise through this development process. Dollar amounts are key to enabling full public participation.

3) For parcels, or portions of parcels, which have historic significance or character, the development plan must spare them from development, possibly including through alternatives such as land trusts or sale of certain parcels, or portions, for use as parkland. Both options should be added as viable alternatives that allow for revenue but also conservation.

4) Retention of all of the existing mature trees in the historic character areas are particularly essential for historic-preservation purposes. All development alternatives must be crafted in such a way as to preserve the mature trees.

5) Other true alternatives to the proposed development plan must be explored. The four "alternatives" listed in the DEIS are not really different from one another, but merely slight variations on a single theme. More effort should be made to provide true alternatives with a variety of financial and real estate options to solve the underlying concern – namely the budget

#92

of the AFRH. **#92 (continued)**

6) The historical importance of the property and maintaining its coherence is overlooked. There should be more detail regarding Section 106 impacts including consideration of knowledgeable sources on the subject, such as Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation.

7) The impact on traffic is vague and unexplored. It requires more details, specifics, and cost information. There is no information about the impact on the community of the number of peak-hour trips suggested in terms of cost to the city of Washington DC to address, the damage to the local infrastructure, and the overall impact on the surrounding community.

8) The DEIS mentions any project being in keeping with the neighborhood, but that standard does not actually appear to be consistently applied in the document. That error must be corrected. For example, alternatives 2 and 3A suggest development in Zone 6 that is not at all in keeping with the adjacent neighborhood's architecture. The existing neighborhood is comprised entirely of rowhouse architecture, with a maximum of three stories in height.

9) If land is to be developed under "GOV" zoning, then all government building standards must be applied, including the most up-to-date environmental standards. For example, the EIS should detail that any development on GOV-zoned land would have to be GSA LEED certified.

10) The draft EIS does not address honestly the fact that the AFRH is proposing extremely dense development of park-like open space in the middle of a neighborhood that is disproportionately low income, elderly, and African American. The density of the proposed development is so high that is likely to adversely the health and well-being (physical and material) of these neighbors. Specifically, the Census tracts adjacent to AFRH on the west have median incomes that place the neighborhood in the lowest 20th percentile for income in the Washington area. These tracts are also 82-90 % African American (compared to 12.4% nationally), with disproportionate percentages of individuals over age 65, below the poverty line, and suffering from disability.

11) The proposed development will have disproportionate negative health effects on minority populations. Specifically, air pollution problems are local as well as regional in scope. The nearby neighborhoods would experience the largest change in air quality from the increased traffic and other pollution sources associated with the proposed development. Further, local air pollution is linked to inercased incidence of respiratory illness. Three different recent studies being published this month in *Epidemiology* find a significant link between daily ground-level ozone in cities and mortality rates in the next 3 days. Ozone is formed when pollutants, such as car exhaust mix with heat and sunlight. Editors of *Epidemiology* have made the rather unprecedented comment that together these studies point to an "urgent need to reduce public exposure to ambient ozone by all possible means." To that fact must be added that communities of color across the nation are experiencing disproportionately high levels of asthma and other respiratory illness. The deteriorated local air quality will also worsen these health problems in this predominantly African American neighborhood. The heat-retention effect of the loss of

current AFRH green space will also promote additional local ground-level ozone formation. Finally, the current mature trees on the AFRH property contribute positively to air quality, particularly in the immediate vicinity of the property.

12) The EIS does not consider the heat-retention impact that the proposed dramatic replacement of green meadow, lawn and trees with buildings and paved surface will have on temperatures in the surrounding area. The dominant green space on the current AFRH campus has a cooling effect that will be radically altered in heat-retaining buildings, parking lots, and roads are constructed where grass and trees now stand. The increased temperatures will result in higher cooling bills, particularly burdensome for the elderly poor, or an increased frequency of dangerous summer conditions for those who cannot afford air conditioning, again particularly the elderly poor. Increased temperatures will also worsen the impact of the increased automotive exhaust associated with the proposed development by promoting local ground-level ozone formation.

13) At the current time, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality.

14) The transportation impact study of the EIS has not considered the impact of increased traffic on side streets between the affected AFRH property and Georgia and New Hampshire Avenues. The impact of the level of increased traffic considered is unlikely to be limited to the main streets currently studied in the EIS. More specifically, the neighborhoods to the west of the AFRH property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The EIS has not considered the impact of increased traffic on loss of recreational services provided by streets in Petworth and Park View. In addition, the District of Columbia government has recognized that there is a serious problem with pedestrian deaths from automobiles on city streets. Bringing a large number of automobiles into narrow residential streets will likely increase the mortality rate in the area to the west of AFRH, particularly because of the relatively large number of elderly and children.

15) Many residents in the area to the west of AFRH use their basements for living space or rent them out to gain much needed income. AFRH enjoys the physical advantages of being the third highest point in the District of Columbia. The draft EIS has not considered how dense construction on the AFRH property will change the water table and how this might affect basements in the adjacent, lower lying area. A rise in the water table seems likely to result from dense development on this land. A raised water table could result in a serious damage to the use of basements and a substantial loss in income.

16) Both residents of the AFRH and neighbors who live to the west of the Home benefit, much as President Lincoln did when the Anderson cottage was built, from the relative calm and quiet provided by the green campus of the Home. The EIS notes that the noise level in the area is that usually found in parks. Area residents enjoy being able to walk past the property and to see it's

green expanses when looking out their windows or down their streets. In this way, the AFRH has provided area residents with a real source of wealth that improves their quality of life in ways that they could not purchase no matter what their income was. This neighborhood does not seem poor to its residents no matter their income because it does not look like a poor neighborhood. The increased traffic, noise, and loss of green beauty and calm will take away something of irreplaceable value in their lives.

17) Finally, and perhaps most importantly, the DEIS has not adequately taken into account the Federal Elements of the Comprehensive Plan for the National Capital adequately. In particular, there appears to have been marked inattention to the Parks and Open Element and the Preservation and Historic Features Element. The Parks and Open Space Element of the Comprehensive Plan for the National Capital makes clear that the capital area is facing increasing demand for open space and park due to increase population and tourism pressure. The Element defines open space as "any land or water surface that is not occupied by buildings, a broad definition that encompasses the vast majority of federal property" (p. 3). Under the Park and Open Space Element directs that federal agencies should:

1. maintain and conserve federal open space as a means of shaping and enhancing urban areas (p. 7);
2. preserve open space that is crucial to the long-term quality of life of a neighborhood or region;
3. Conserve and maintain the essential open space character of areas in the region with significant park, open space cultural or natural qualities that contribute to the setting of the National Capital Region." The Element specifically includes McMillan Reservoir to the immediate south of Zone 5 as an example.
4. "Conserve portions of military reservations that add significantly to the inventory of park, open space, and natural areas and should, to the extent practicable be used by the public for recreation … [i.e.,] when *security* considerations permit (p. 8-9)." The Element *explicitly includes U.S. Soldier's and Airmen's Home* as an example of this.
5. "Maintain and conserve trees and other vegetation in the landscaped buffer areas on federal installations in a natural condition."

The Park and Open Space Element also stresses the importance of connectivity between parks and open spaces in the Capital Region. As already noted, the Element has identified both AFRH and the McMillan Reservoir to its immediate south as areas to be preserved as open space and parkland. Fort Totten to the northeast of AFRH is also an important part of the long-run open space plan for the Capital region. As land is currently configured, links could be made between these three areas through green bikeways. Loss of the AFRH property to development could seriously impair this open space connectivity.

The Parks and Open Space Element highlights the unique role that parks created around historic sites play in the Capital Region. The federal government is to "establish and preserve historic parks as important legacies of national, historic, architectural and landscape significance. The Anderson cottage and two acres surrounding it have been designated a National Monument because of its importance in Lincoln and other 19th century presidencies. But as the DEIS notes,

the importance of the AFRH site does not stop with this. To its immediate north is the first national military cemetery, predating Arlington National Cemetery. The AFRH itself has been in continuous use as a final home for members of the U.S. Armed Services since the middle of the 19th century. It is the U.S. equivalent of Les Invalides in Paris. Its central landscaped core and the agricultural land (now garden) of Zone 6 are essentially unchanged from the 19th century and provide a coherent and important historical context for the National Monument, cemetery and historically important home. The Elements are very clear about the importance of protecting just such landscapes from destruction.

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The Preservation and Historic Features Federal Elements set policies regarding federal government stewardship of historic properties and the historic plan of Washington, D.C. Under these Elements federal agencies should:

1. protect the settings of historic properties, including views to and from sites where significant, as integral parts of the historic character of the property (p. 8);
2. protect the *reservations that contain historic landscapes and features from incompatible changes or incursion*;
3. protect views .. *inward from vantage points along the rim of the topographic bowl from inappropriate intrusions. Open space should be preserved to allow for public use and enjoyment of these views. (Examples include …the escarpment north of Florida, Ave. NW)*..

The Parks and Open Space Element of the Comprehensive Plan for the National Capital: Federal

Elements directs the federal government to look to redevelopment of surplus federal property as a means of adding to the region's inventory of parks and open space and notes that future acquisitions could occur by purchase, easement, donation or exchange. An alternative that has not been included in the EIS is exchange of land in Zones 5 and 6 for other federal surplus land that could be more appropriately developed. Exchanging this land for land in another location and development there could provide needed financial resources for AFRH. Zones 5 and 6 could then continue to play the important role they currently play in the District's system of federal open space by protecting historic landscapes, providing appropriate context for an important historical site and protecting views of the central core of the capital as directed by the Federal Elements. If the land were transferred to the National Park Service to enlarge the Lincoln Cottage National Monument, this would not only preserve open space but would help protect the historical integrity of the setting for the cottage as a place of retreat and rest, thus preventing the kind of encroachment of inappropriate new development that has so adversely affected the Manassas Battle Field and other major Civil War historic sites. It would also enhance public access to much needed open space in the District as a whole as well as the adjacent neighborhoods. In addition, it may serve to substantially mitigate adverse environmental impacts of development on the eastern Zones 2, 3, and 4.

The District of Columbia Parks and Recreation is currently in the middle of a comprehensive planning process. As part of this effort they are conducting a survey of park and recreation needs indicating a significant deficit of park space in the Petworth, Park View, Columbia Heights area. The AFRH property is a uniquely large landscaped open space – one of the few remaining unprotected open space areas in the eastern part of residential Washington DC. The planning process should also be timed to accommodate consideration of the current comprehensive planning process of the D.C. Department of Parks and Recreation.

The location of a park in Zone 6 in the AFRH EIS would be easily accessible to dense development in neighboring Columbia Heights and to planned dense residential development along Georgia Avenue, as well as dense development planned for the rest of the AFRH site. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northwest and northeast D.C.

The open space already provided by AFRH is an integral design element of the adjacent Petworth and Park View rowhouse neighborhoods, developed in the early 1900s. Surrounding streets to the west of the Home were designed to take advantage of vistas of the open space provided by the Home's property. For example, the vista from Grant Circle down Illinois Ave to Zone 6 is an important anchoring design element in the eastern part of Petworth. The Preservation Element of the Federal Elements direct federal agencies to "protect reciprocal views along rights-of-way and from … circles (p. 11)." Replacing the vista of this green expanse that opens out over a view of the federal core of the city with a view of an eight story apartment building would significant harm the integrity of historic city plan in this part of the capital.

Among the alternatives, the DEIS has not considered alternatives that would provide significant parkland for the neighborhood to the west of AFRH. As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of Soldier's Home

were developed in the early 1900s around the presence of the Soldier's Home as open space.

Thank you for your consideration of these comments. I am confident that adequate and appropriate consideration of the comments of all affected parties will produce a better end result for AFRH, its residents, and the multitude of other city residents who will be affected by the proposed development.

Finally, please add me to any list of announcements or meetings concerning the proposed development at AFRH. My e-mail address is mvasmith@hotmail.com.

Sincerely,



Mitzie Smith
731 Rock Creek Church Road, NW
Washington, DC 20010

cc: Councilman Adrian Fenty
Councilman Jim Graham
The Honorable Eleanor Holmes Norton

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Melissa Singer
Address: 5806 8th Street
Affiliation:
Phone: 540 - 622 - 7014

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

I am absolutely AGAINST any development of ZONE 6. Developing this zone will be the most destructive, both Culturally & environmentally speaking. All options presented were very similar. However OPTION 2 is the WORST. Option 1, do nothing, would be my choice. But since that is not financially viable, there should be an option that provided something for the community. There should be a park or public green space for people, not just 100% development for maximum profit. These plans do not take into consideration the local community, but are designed to benefit outside developers most.

I would also call for a more thorough assessment of impact to wildlife. To simply say →

Please send comments to: #186

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

this is an urban area so impact is minimal is absolutely false. As a Smithsonian research biologist who has studied urban ecosystems, I am sure impact to such an area is not minimal & will be trying to pursue a study which will prove it if development of ZONE 6 proceeds. This area should be off limits. Preserving this area will be some protection for wildlife that will be affected by the development.

#186 (continued)

I hope you will take the time to consider more options. This is an opportunity that will never come again, not just to make money, but to increase opportunities for community interaction with the residents, cultural experiences, while keeping key areas intact. Please look beyond the dollars and act responsibly. Sincerely, M[illegible]

Arlus J. Stephens
205 Taylor Street NW
Washington, DC 20011
arlusj@yahoo.com

July 6, 2005

Sent Via Electronic Mail

Donald Dailey (donald.dailey@afrh.gov)
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

Re: Response to Draft EIS for AFRH-Washington Plan

Dear Mr. Dailey,

Please accept the following as my written comments on the AFRH Washington Master Plan Draft Environmental Impact Statement (DEIS). They will likely mirror comments raised by other individuals and entities, but they also include other comments that may well be mine alone.

First, some important stakeholders were not on your list of individuals and organizations to whom the DEIS was provided. The District of Columbia Department of Parks and Recreation (DPR) was not served with the DEIS and did not learn of it until July 1, less than one week ago. In addition, it is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the DEIS. Notice of the DEIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for Washington's monumental core or to the superintendent of Rock Creek Parkway. Finally, residents of Wards 1 and 4 of the District of Columbia were not adequately informed. In addition to being important stakeholders, those individuals have a wealth of knowledge crucial to effectively addressing the myriad issues raised in the DEIS.

To remedy these deficiencies, the comment period for the DEIS should be extended so that these important stakeholders can properly comment on the DEIS.

Second, the DEIS needs to provide information regarding the exact amount of money that AFRH needs to raise through this development process. Dollar amounts are key to enabling full public participation. Otherwise, the public is left without ability to weigh in on cost-benefit calculations crucial to evaluating the environmental impact of the proposed development. Without this information commenting on the DEIS is an empty exercise, to the extent the Home plans to cite financial reasons for rejecting certain

development alternatives.

Third, for parcels, or portions of parcels, which have historic significance or character, the development plan must spare them from development, possibly including through alternatives such as land trusts or sale of certain parcels or portions thereof for use as parkland. Both options should be added as viable alternatives that allow for revenue but also conservation. This is particularly true for parcels 1, 5 and 6, each of which front onto residential neighborhoods in Petworth and Park View. #94

Fourth, the DEIS did not make clear that any development would include retention of all mature trees. Keeping these trees is important, particularly in the historic character areas. All development alternatives must be crafted in such a way as to preserve the mature trees. #91

Fifth, other alternatives to the proposed development plan must be explored. The four "alternatives" listed in the DEIS are not really different from one another, but merely slight variations on a single theme: massive development. The DEIS needs to be reworked to include medium-range development alternatives. For example, none of the alternatives includes parkland, despite the fact much of the land has incredible historical significance and sits next to residential neighborhoods. #92

Sixth, the DEIS overlooks the historical importance of the property and maintaining its coherence. There should be more detail in the DEIS including consideration of knowledgeable sources on the subject, such as the Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation. #33

Seventh, the impact on traffic is vague and incomplete. It requires more details, specifics, and cost information. There is no information about the impact on the community of the number of peak-hour trips suggested in terms of cost to the city of Washington DC to address, the damage to the local infrastructure, and the overall impact on the surrounding community. #223

Moreover – and of particular concern to those neighbors left out of the communications loop in Wards 1 and 4 -- the transportation impact study of the EIS has not considered the impact of increased traffic on side streets between the affected AFRH property and Georgia and New Hampshire Avenues, NW. Based on some of the proposed development plans, the impact of the increased traffic will not be confined to the main streets currently studied in the EIS. The neighborhoods to the west of the AFRH property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The EIS has not considered the impact of increased traffic on loss of recreational services provided by streets in Petworth and Park View. #224

In addition, the District of Columbia government has recognized that there is a serious problem with pedestrian deaths from automobiles on city streets. Bringing a large number of automobiles into narrow residential streets will likely increase the mortality

rate in the area to the west of AFRH, particularly because of the relatively large number of elderly and children. #224 (continued)

Eighth, the DEIS mentions the desirability of any project being in keeping with the neighborhood, but then it proceeds to effectively ignore any development alternatives that would do just that. That error must be corrected. For example, alternatives 2 and 3A suggest development in Zone 6 that is not at all in keeping with the adjacent neighborhood's architecture. The existing neighborhood is comprised entirely of rowhouse architecture, with a maximum of three stories in height. #129

Ninth, the DEIS does not consider the heat-retention impact that the proposed dramatic replacement of green meadows, lawn and trees with buildings and paved surfaces will have on temperatures in the surrounding area. The dominant green space on the current AFRH campus has a cooling effect that will be radically altered if heat-retaining buildings, parking lots, and roads are constructed where grass and trees now stand. The increased temperatures will result in higher cooling bills, particularly burdensome for the elderly poor, or an increased frequency of dangerous summer conditions for those who cannot afford air conditioning, again particularly the elderly poor. Increased temperatures will also worsen the impact of the increased automotive exhaust associated with the proposed development by promoting local ground-level ozone formation. It will also have a deleterious effect on those neighbors with respiratory conditions. #173

Tenth, similarly, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality.

Eleventh, many residents in the area to the west of AFRH use their basements for living space or rent them out to gain much needed income. AFRH enjoys the physical advantages of being the third highest point in the District of Columbia. The draft EIS has not considered how dense construction on the AFRH property will change the water table and how this might affect basements in the adjacent, lower lying area, or simply what will be the effect to drainage systems, natural or man made. A raised water table could result in a serious damage to the use of basements and a substantial loss in income. #176

Twelfth, both residents of the AFRH and neighbors who live to the west of the Home benefit, much as President Lincoln did when he lived in the Anderson cottage, from the relative calm and quiet provided by the green campus of the Home. The EIS notes that the noise level in the area is that usually found in parks. Area residents enjoy being able to walk past the property and to see it's green expanses when looking out their windows or down their streets. In this way, the AFRH has provided area residents with a real source of wealth that improves their quality of life in ways that they could not purchase no matter what their income was. This neighborhood does not seem poor to its residents no matter their income because it does not look like a poor neighborhood. The increased traffic, noise, and loss of green beauty and calm will take away something of #169

irreplaceable value in their lives. #169 (continued)

Thirteenth, finally, and perhaps most importantly, the DEIS has not adequately taken into account the Federal Elements of the Comprehensive Plan for the National Capital. In particular, there appears to have been a marked inattention to the Parks and Open Element and the Preservation and Historic Features Element. The drafters of the DEIS should review those documents and re-issue a DEIS that properly addresses the myriad concerns raised therein. For example, an alternative that has not been included in the EIS is exchange of land in Zones 5 and 6 for other federal surplus land that could be more appropriately developed, with those revenues going to AFRH. Zones 1, 5 and 6 could then continue to play the important role they currently play in the District's system of federal open space by protecting historic landscapes, providing appropriate context for an important historical site and protecting views of the central core of the capital as directed by the Federal Elements. If the land were transferred to the National Park Service to enlarge the Lincoln Cottage National Monument, this would not only preserve open space but would help protect the historical integrity of the setting for the cottage as a place of retreat and rest, thus preventing the kind of encroachment of inappropriate new development that has so adversely affected the Manassas Battle Field and other major Civil War historic sites. It would also enhance public access to much needed open space in the District as a whole as well as the adjacent neighborhoods. In addition, it may serve to substantially mitigate adverse environmental impacts of development on the eastern Zones 2, 3, and 4.

The location of a park in Zone 6 in the AFRH EIS would be easily accessible to dense development in neighboring Colombia Heights and to planned dense residential development along Georgia Avenue, as well as dense development planned for the rest of the AFRH site. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northwest and northeast D.C.

The open space already provided by AFRH is an integral design element of the adjacent Petworth and Park View rowhouse neighborhoods, developed in the early 1900s. Surrounding streets to the west of the Home were designed to take advantage of vistas of the open space provided by the Home's property. For example, the vista from Grant Circle down Illinois Ave to Zone 6 is an important anchoring design element in the eastern part of Petworth. The Preservation Element of the Federal Elements direct federal agencies to "protect reciprocal views along rights-of-way and from … circles (p. 11)." Replacing the vista of this green expanse that opens out over a view of the federal core of the city with a view of an eight story apartment building would significant harm the integrity of historic city plan in this part of the capital.

Thank you for your consideration of these comments. I am confident that adequate and appropriate consideration of the comments of all affected parties will produce a better end result for AFRH, its residents, and the citizens of the District of Columbia.

Sincerely yours,

/s/
Arlus J. Stephens

Please accept my remarks as comments on the draft EIS statement.

As a current active duty service member I wholeheartedly support the mission of the AFRH. Additionally, as a Petworth resident I support the AFRH as a valuable local and historical asset.

That being said, I find the proposals contained within the draft EIS to be far too potentially damaging to the environment of NW Washington DC. I believe that the sheer amount of concrete and asphalt alone will disrupt the local ecosystem. The current green space acts as a natural buffer to the heat retention and decreased drainage of the concrete that exists outside the home. #34

The effect of increased traffic is not sufficiently explored in the EIS. More detail and study, including of potential mass transit hubs, needs to be included in the final EIS.

I would encourage the AFRH to consider slowing down the pace of proposed development. Once an area is sold and developed, it's gone forever. While I have no problem, per se, with development at AFRH, I would like to see a more thought out process that includes community involvement at all phases. #60

Sincerely,

Matthew Sullivan

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name:

Address:

Affiliation:

Phone: 202-554-0296

Edward L. Sitts
3700 N Capitol St NW Apt 536
Washington, DC 20011

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

SUBJ: MASTER PLAN/AFRH-W 23 JUNE 2005

AFTER ATTENDING THE PUBLIC MEETING IN SCOTT THEATER AND AFTER HAVING REVIEWED THE 1-4 ALTERNATIVES FOR SITE DEVELOPMENT AT AFRH-W (Proposed), I'M FORWARDING MY COMMENTS:

1- PLEASE PRESERVE OUR GREAT BUILDING + HAVE DEVELOPERS INCLUDE IT FOR THEIR PLANS

2- INCLUDE OPPORTUNITIES FOR ABLE BODIED RESIDENTS TO BE EMPLOYABLE ON PART TIME/FULL TIME BASIS BY THE DEVELOPERS/CONTRACTORS AND FOR FUTURE WORK OPPORTUNITIES AFTER DEVELOPMENT IS TRANSFERRED.

3. PROVIDE THROUGH COMPLETED PROJECTS PARTICIPATORY EDUCATIONAL/MEDICAL/RECREATIONAL OPPORTUNITIES TO RESIDENTS TO ENSURE QUALITY OF LIFE IMPROVEMENT ENHANCEMENT THEREBY.

#71

Respectfully,

Edward L. Sitts

Sheridan 2005

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

Mr. Dailey.

Please use this response amending what I sent earlier today. The only difference is omitting the reference to the Sierra Club since the group has not had the chance to review this statement.

Thanks for the chance to participate.

Lisa Swanson <melatar@yahoo.com> wrote:
Date: Wed, 6 Jul 2005 14:13:08 -0700 (PDT)
From: Lisa Swanson <melatar@yahoo.com>
Subject: Armed Forces Retirement Home ? Washington draft EIS
To: donald.dailey@afrh.gov

Donald Dailey (donald.dailey@afrh.gov)

Armed Forces Retirement Home

3700 North Capitol Street, NW

Washington, DC 20011

Armed Forces Retirement Home ? Washington

Response to Draft Environmental Impact Statement

I live a block from the AFRH-W site where I benefit from the climate conditions and quiet of the tree cover and meadow and see views of the site many times a day.

Range of options:

While the draft EIS appears to consider a range of options for the effects of developing spaces on the AFRH-W, the potential development options proposed to generate revenue does not include the potential of opening this middle-city green space to the public without further extensive development.

The current AFRH-W website proudly promotes "a city within a city" with amenities that the Petworth, Park View and other adjacent neighborhoods have been lacking for years: an auditorium for films and live entertainment, a golf course and driving range, stocked fish ponds, community garden space, a bar and restaurant or space for a large catered event, a bowling alley, craft studios, magnificent and modest buildings of historical interest, and superb vistas within a landscape relatively untouched for almost two centuries. #118

With sound management and promotion, by opening access gates to the public, all of these amenities could provide additional commercial and recreational resources for the surrounding residential neighborhoods, apart from the larger-scale development planned at Georgia Avenue/New Hampshire Avenue, with none of the short- or long-term adverse effects.

The EIS does not consider the cumulative effects of slated development at Georgia Avenue/New Hampshire Avenue or the potential development of the Macmillan Sand Filtration site. #170

Transit:

The EIS notes the relatively poor public transit options nearby. Though the entrances to the site are barely within walking distances of Metrorail stations, they are underserved by buses, with one route running along the northwest gates, two along the south, and none along the eastern perimeter. Thus the development options evaluated rely on acres of parking: Plan 2, the most extensive, considers building 17 thousand parking spaces. Yet there is no inclusion in any options for bikeways and pedestrian walkways to or within the existing perimeter.

The Washington Post of 22 June included an article proposing extensive new development (though in a completely different type of site at a Metrorail station, and outside the Beltway) designed to discourage the use of cars ("Mini-City Plan Discourages Use of Cars," Metro, June 22). This would introduce a radical rethinking of development within the metropolitan area, but a necessary one for the health of the city.

Other statements have addressed the changing but overwhelmingly residential characteristics of the immediate neighborhood. For the purposes of any development within the District of Columbia, the environmental impact considerations must include not only the perimeter neighborhoods, but also the Anacostia and Potomac rivers and the Chesapeake Bay. #171

##

Though sensible growth in areas with existing roads, schools and other services is preferable to creating sprawl, we do not need to sacrifice increasingly precious green space, useable by all for recreation and other purposes, to development for unsubstantiated need for income. #47

Until the financial situation is explained the "needs" of this entity are justified, further development that compromises the economic and physical health of the neighboring community cannot proceed.

DELETE...EXTRA COPY

Please accept my remarks as comments on the draft EIS statement. EXTRA COPY!!

As a current active duty service member I wholeheartedly support the mission of the AFRH. Additionally, as a Petworth resident I support the AFRH as a valuable local and historical asset.

That being said, I find the proposals contained within the draft EIS to be far too potentially damaging to the environment of NW Washington DC. I believe that the sheer amount of concrete and asphalt alone will disrupt the local ecosystem. The current green space acts as a natural buffer to the heat retention and decreased drainage of the concrete that exists outside the home.

The effect of increased traffic is not sufficiently explored in the EIS. More detail and study, including of potential mass transit hubs, needs to be included in the final EIS.

I would encourage the AFRH to consider slowing down the pace of proposed development. Once an area is sold and developed, it's gone forever. While I have no problem, per se, with development at AFRH, I would like to see a more thought out process that includes community involvement at all phases.

Sincerely,

Matthew Sullivan

Dear Mr Dailey;

As I look over your Environmental Impact Statement. This plan could be prosperous for the AFRH. Also it could become a financial drain on the budget. I can also see the AFRH-W in the future will lack admissions to the Home forcing the Home to close.

#36

My Question:
If this should happen would the "U. S. Old Soldier's Home" become a National Historic Preservation Museum?

How about a Granite Wall with all residents that have lived here from 1841 to present, have their names engraved.

Our grandchildren and great-grandchildren would have a great time.

Thank you.

Elton L Sylvia Sr
Scott MN 4205

Dear Mr. Dailey, 4 July 05

Permit me to introduce myself. I am Joseph F. Taylor, Ret/USAF. I have lived here @ AFRH-W, off and on for more than (25) years. For the most part I have enjoyed my stay immensely. I personally feel that too much medical care is available here on campus. I favor a dispensary level facility and I say that because of our near proximity to medical units in the area.

I will likewise fall in step with those who criticize current fee payments. For (200 +) years we paid nothing. I cannot believe that "User Fees" help the survival of this facility hardly at all. Especially, since some are allowed to live here for little or nothing.

Recommendations; Sell off the Le Guard Medical Facility. Drop the (60) year old age limit. Level fees so that all Residents pay the same. Reduce medical staff. Cut the current staff level even more. Many residents would rent space for storage and we have lots of empty space. Thank you for reading my ramblings. #119

Joseph Taylor,

Resident

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: EDWARD L. TIFFEY

Address: 4510 SECOND STREET, N.E.

Affiliation: WASHINGTON, D.C. 20011-4967

Phone: 202-529-4111

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

Thank you for the opportunity to comment on the draft EIS for the proposed development of the Soldiers Home property. I am a resident of the Park View neighborhood to the west of the Soldiers home, in an area that would be impacted most directly by development of zone 6, though community-wide impacts from the other proposed zones would also affect me.

The draft EIS covers a number of items that are important to me as a resident of the neighborhood adjacent to the Soldiers Home, such as development's impact on traffic, community services, and the local economy. Unfortunately, the draft EIS did not account for some items, and I hope that this will be resolved in the publishing of the final EIS.

In many of the alternatives (2,3A, 4) , the EIS proposes to use zone 6 for residential development with some retail space as well. In Alternative 2, the EIS refers to ares "compatible with the residential development west of Rock Creek Church Road." It should be noted that compatibility with the surrounding neighborhoods would require open streets. Gated neighborhoods would not be compatible with the existing openness and community atmosphere of the surrounding Park View and Petworth neighborhoods. Moreover, current residents should have access to any new retail developments. #138

Alternative 3B also holds potential in its suggestion for the development of an embassy in zone 6. This could be a positive addition to the neighborhood, offering the neighborhood prestige and potential commercial customers of local shops. However, p. 4-22 recognizes a need for increased police presence only in the even of demonstrations. The FEIS should recognize that foreign missions would require a greater constant police presence both at the site and in the surrounding neighborhood. #141

Park View residents enjoy a view of the trees and green areas of the Soldiers Home. The draft EIS recognizes the loss of this viewshed on p. 4-19, unfortunately no mitigation measures are mentioned for this loss. The FEIS should include the option of mitigating at least some of this loss of the historic "park view" of the nighborhood. #191

Nor does the draft EIS afford any opportunities for greater public access to green areas. On p. 3-17, the draft EIS identifies the need for more public parks and green spaces as part of the land use plan of The Comprehensive Plan for the National Capital. Later, on p. 4-23, the draft EIS concludes that Master Plan Alternatives would "conserve open space on the site," but it does not include any opportunity for public access to this open space. On p. 4-38, the draft EIS acknowledges that the use of the Soldier Home as public parkland is compatible with the traditional residential neighborhoods surrounding it. I would feel more comfortable supporting any of the Master Plan Alternatives if some public access was given to the existing green areas within the Soldiers Home property, thereby making the Master Plan Alternatives consisted with the stated goals of the Comprehensive Plan. #123

It is my hope that these issues will be addressed in full in the Final EIS. Thank you for consideration of my views.

Michael Tubman

3647 Warder Street, NW
Washington, DC 20010

MEMO

To: Donald Dailey (Donald.dailey@afrh.gov)
Armed Forces Retirement Home

Cc: Councilman Jim Graham
Councilman A. Fenty
Andrew McGilvray, President, U.N.C.
The Honorable Eleanor Holmes Norton

From: Drew Tulchin
3644 Park Pl. NW
Washington, DC 20010
(202) 256-2692

Re: Response to DEIS of 'Old Soldier's Home' AFRH-Washington Plan Draft Environmental Impact Statement Comment Form

(Note: I would like to receive a copy of the Final EIS when available.)

Comments:

Dear Mr. Dailey,

Thank you for the opportunity to present my comments to the AFRH Washington Master Plan Draft Environmental Impact Statement. As a neighbor on Park Place living directly across the street from the 'Old Soldier's Home', I am highly appreciative your effort is seeking public comment. It is a positive sign to you, especially compared with other military and federal government land activities in DC and nation-wide. My comments are as follows:

1) The EIS does not mention, suggest, or provide financial information as to how sale of land and development thereof is really a solution to the economic challenges of the AFRH Master Plan. The first solution of non-sale should explore other revenue generation schemes, including but not limited to: reduction in costs, better budgeting, increasing contributions from enlisted men, fund-raising, and rental of existing resources. Without a sense of the economic need, there is no way to determine if the suggestions truly would be successful or not. Options other than just sale must be explored, as sale is a short term gain, not a long term sustainable solution. **#48**

2) The four alternatives listed are not really different from one another. More effort should be made to provide true alternatives with a variety of financial and real estate options to solve the underlying concern – namely the budget of the AFRH.

3) There is no mention of the potential of establishing a land trust or sale of property as a park. Both options should be added as viable alternatives that allow for revenue but also conservation.

4) The historical importance of the property and maintaining its coherence is overlooked. There should be more detail regarding Section 106 impacts and from consideration of knowledgeable sources on the subject, such as Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation.

5) The impact on traffic is vague and unexplored. It requires more details, specifics, and cost information. There is no information about the impact on the community of the number of peak hour trips suggested in terms of cost to the city of Washington DC to address, the damage to the local infrastructure, and the impact that has on the surrounding community.

6) The increase in as many as 50,000 people on this space does not consider reasonable physical space for parking, attractive building, and quality of life for work or living. We expect federal standards of parking of 1:5 ratio and other federal requirements be established for mitigation.

7) There is some mention of any project being in keeping with the neighborhood, but it appears to be inconsistently applied to the document. That error should be amended. Examples are that alternatives 2 & 3A suggest developments in Section 6 that are not in keeping with the community at all. There are no multi-story buildings any in the neighborhoods. There is not enough parking for such construction and the local streets cannot accommodate such traffic. These alternatives need to be identified as not keeping with the neighborhood. They should be removed altogether as also not in keeping with the stated goals of the master plan and the impact goals.

8) Any development should be in compliance with environmental standards. The EIS should detail that any choose would have GSA LEED certified buildings and a reasonable percentage (10%) classified as green building standards.

Sincerely,
Drew Tulchin

Hello, and thank you for taking the time to review my comments.

Personally, I am against development of any of the property of the Armed Forces Retirement Home (especially zone 6 along Park Place), with the exception of renovation / expansion of existing buildings. I believe redevelopment along Georgia Ave is essential to the quality of life in this area of DC, and any competing development risks over-development. Please understand that I am all for helping to find alternatives so our soldiers can be adequately cared for, and given the resources our country owes them. #37

Below, here are my comments relating to the EIS directly.

- The May 2005 draft contains many condradictions:
  - Section 1-9 says Minority / Low Income populations potentially could be disproportionately affected vs. section 2-17 Low Income and minority populations would not be disproportionately effected. #38
  - There may not be sufficient infrastructure to support the additional facilities (1-11) vs. "no direct impacts to water resources" (2-16) and other statements listed throughout (see vii, viii).
  - Traffic considerations do not include increases from the Lincoln Cottage, or the hotel planned for the sight, not to mention that it is far enough away from the metro station that most people aren't going to walk, but drive. Additionally, it does not include an assessment of how traffic will be impacted from the new projects already slated for Georgia Avenue, Columbia Heights, and Petworth.
  - Many sections are too general/board to have any real meaning. When you look at the "Detail" sections, they don't offer any more insight than the summary sections do.
  - Under the "no action" plan, it says there will be an adverse economic impact to the AFRH-W because of insufficient funding (2-18) ? this statement is intellectually dishonest. A "no-action" option would have a neutral effect (no effect) on the current financial situation. #202
  - Other alternatives to generating revenue for the Old Soldiers Home need to be discussed. Our Federal Government has the responsibility to make sure our soldiers are adequately funded in their retirement. Giving up their gardens and green space or their prescription drugs should not even be an issue. Granted, this proposal is the easiest out for the financial woes of the AFRH, but it's a band-aid. #124

- Almost all of the Impact Summary shows a negative effect to the existing community:
  - More traffic on roads the draft says are already congested (vii).
  - § Alt 3A/3B and 4 site access would fail (2-20) § North capital St would fail o Removal of mature trees (2-16) o Adverse effects on auqatic life (2-16) o Adverse effects to topography (2-16) o Increase noise level (viii) o Degraded air-quality (viii)(1-11)(2-20) o Decreased green space #39
  - Increase in city and federal services (2-17) o Direct, long-term adverse impact on archeological / historical significance (2-19) o Says current Lincoln cottage views would be adversely affected, yet the city and federal government have spent allot of money to preserve this historic sight.
  - Only short term interests of developers and profiteers are served by this plan, but the long term interests of Washington DC, residents of Petworth, and residents of the Old Soldiers Home are not represented.

- Every option, except the "no action" option, is huge in scale, even 3B, which shouldn't even be on the table sense the State Department has clearly stated they have no interest in putting Embassies and such at the sight. #142

- The Master Plan for our neighborhood includes a lot of development along Georgia Avenue, which I support. Well, we have allot of work to do on Georgia Avenue, so let's get that rolling before we consider competing opportunities. We risk over development and suffocating the neighborhood charm if we act too quickly.

- How do the Soldiers feel about this? Every soldier I have talked to either doesn't know about it, or is against it. I am told by long time residents in the neighborhood that the reason public access was closed off at the Old Soldiers Home was because they wanted it to be peaceful and quite for the soldiers, now we're talking about creating a city within a city? The increase from the Lincoln Cottage is certainly going to make it busier around there, but not to the point that creating this huge development will. #61

I am against any development of the property at all, except renovation/expansion of existing buildings. If it could be opened as public green-space that would be great, but I really believe we should leave it as it is in its historical context, and for the soldiers as originally intended by George Riggs.

Thanks You,

Cliff Valenti
202.336.7764

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Brian Van Wye

Address: 4218 3rd St. NW, DC 20011

Affiliation:

Phone: 202-465-4708

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

• Thus far, efforts to engage the community in this process have been inadequate:

× I read the paper and listen to the radio and walk streets near the AFRH, but I have heard nothing about this proposal until a few weeks ago--despite the fact that Fed. Reg. notice appeared in August, 2004. #62

• Little effort made to clearly explain alternatives + criteria to evaluate them. Presentation esoteric. No detailed description of alternatives--brochure had too little info--much less than the presentation #41

• Stormwater impact should be very strongly controlled - No Net impact #193

• Public parks + green spaces must be a part of this plan if AFRH expects city support. Walkways ~~through~~ across the property (E-W) should be incorporated

#84 • Retail should be ~~incorporated into~~ part of the final design--on both East + West sides of ~~[illegible]~~ AFRH.

Please send comments to: • Traffic congestion must be anticipated + mitigated so that impact is zero or negligible. #244

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

• Substantial efforts (e.g. a set-aside of jobs) should be made to ensure that DC residents benefit from job opptys assoc w/construction + development #40

All comments must be postmarked by 6 July 2005.

For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: DAVID VINTON

Address: 1925 ISAAC NEWTON SQ. EAST SUITE 110

Affiliation: RESTON VA 20190

Phone: 703 277 8822 - SILVER WOOD COMPANIES

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

VERY INFORMATIVE.

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

Dear Mr. Dailey,

Thank you for the opportunity to present my comments on the AFRH Washington Master Plan Draft Environmental Impact Statement (DEIS). My comments on the DEIS are as follows:

1) Some important stakeholders were not on your list of individuals and organizations to whom the DEIS was provided. The District of Columbia Department of Parks and Recreation (DPR) was not served with the DEIS. My understanding is that they did not learn of the draft EIS until July 1 ?
inadequate time to properly respond ? and even then only learned of the DEIS through concerned city residents. The comment period for the DEIS should be extended so that DPR can complete its own comprehensive planning process in a way that can consider potential use of part of the AFRH property to meet city park needs. In addition, it is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the DEIS. Notice of the DEIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for Washington's monumental core or to the superintendent of Rock Creek Parkway. #53

2) The DEIS needs to provide information regarding the exact amount of money that AFRH needs to raise through this development process.

3) For parcels, or portions of parcels, which have historic significance or character, the development plan must spare them from development, possibly including through alternatives such as land trusts or sale of certain parcels, or portions, for use a parkland. Both options should be added as viable alternatives that allow for revenue but also conservation. #94

4) Retention of all of the existing mature trees in the historic character areas are particularly essential for historic-preservation purposes. All development alternatives must be crafted in such a way as to preserve the mature trees. #91

5) Other true alternatives to the proposed development plan must be explored. The four "alternatives" listed in the DEIS are not really different from one another, but merely slight variations on a single theme. #92
More effort should be made to provide true alternatives with a variety of financial and real estate options to solve the underlying concern ? namely the budget of the AFRH.

6) The historical importance of the property and maintaining its coherence is overlooked. There should be more detail regarding Section 106 impacts including consideration of knowledgeable sources on the subject, such as Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation.

7) The impact on traffic is vague and unexplored. It requires more details, specifics, and cost information. There is no information about the impact on the community of the number of peak-hour trips suggested in terms of cost to the city of Washington DC to address, the damage to the local infrastructure, and the overall impact on the surrounding community. #223

8) The DEIS mentions any project being in keeping with the neighborhood, but that standard does not actually appear to be consistently applied in the document. That error must be corrected. For example, alternatives 2 and 3A suggest development in Zone 6 that is not at all in keeping with the adjacent neighborhood's architecture. The existing neighborhood is comprised entirely of rowhouse architecture, with a maximum of three stories in height. #129

9) If land is to be developed under "GOV" zoning, then all government building standards must be applied, including the most up-to-date environmental standards. For example, the EIS should detail that any development on GOV-zoned land would have to be GSA LEED certified. #3

10) At the current time, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality. #173

11) The transportation impact study of the EIS has not considered the impact of increased traffic on side streets between the affected AFRH property and Georgia and New Hampshire Avenues. The impact of the level of increased traffic considered is unlikely to be limited to the main streets currently studied in the EIS. #224

12) Many residents in the area to the west of AFRH use their basements for living space or rent them out to gain much needed income. AFRH enjoys the physical advantages of being the third highest point in the District of Columbia. The draft EIS has not considered how dense construction on the AFRH property will change the water table and how this might affect basements in the adjacent, lower lying area. A rise in the water table seems likely to result from dense development on this land. A raised water table could result in a serious damage to the use of basements and a substantial loss in income. #176

13) Both residents of the AFRH and neighbors who live to the west of the Home benefit from the relative calm and quiet provided by the green campus of the Home. The EIS notes that the noise level in the area is that usually found in parks. Area residents enjoy being able to walk past the property and to see its green expanses when looking out their windows or down their streets. In this way, the AFRH has provided area residents with a real source of wealth that improves their quality of life in ways that they could not purchase no matter what their income was. This neighborhood does not seem poor to its residents no matter their income because it does not look like a poor neighborhood. The increased traffic, noise, and loss of green beauty and calm will take away something of irreplaceable value in their lives.

14) Finally, and perhaps most importantly, the DEIS has not adequately taken into account the Federal Elements of the Comprehensive Plan for the National Capital adequately. In particular, there appears to have been an marked inattention to the Parks and Open Element and the Preservation and Historic Features Element. The Parks and Open Space Element of the Comprehensive Plan for the National Capital makes clear that the capital area is facing increasing demand for open space and park due to increase population and tourism pressure. The Element #198

defines open space as "any land or water surface that is not occupied by buildings, a broad definition that encompasses the vast majority of federal property" (p. 3). Under the Park and Open Space Element directs that federal agencies should:

1. maintain and conserve federal open space as a means of shaping and enhancing urban areas (p. 7); 2. preserve open space that is crucial to the long-term quality of life of a neighborhood or region; 3. Conserve and maintain the essential open space character of areas in the region with significant park, open space cultural or natural qualities that contribute to the setting of the National Capital Region."
The Element specifically includes McMillan Reservoir to the immediate south of Zone 5 as an example.
4. "Conserve portions of military reservations that add significantly to the inventory of park, open space, and natural areas and should, to the extent practicable be used by the public for recreation ?
[i.e.,] when security considerations permit (p. 8-9)." The Element explicitly includes U.S. Soldier's and Airmen's Home as an example of this.
5. "Maintain and conserve trees and other vegetation in the landscaped buffer areas on federal installations in a natural condition."

The Park and Open Space Element also stresses the importance of connectivity between parks and open spaces in the Capital Region. As already noted, the Element has identified both AFRH and the McMillan Reservoir to its immediate south as areas to be preserved as open space and parkland. Fort Totten to the northeast of AFRH is also an important part of the long-run open space plan for the Capital region. As land is currently configured, links could be made between these three areas through green bikeways. Loss of the AFRH property to development could seriously impair this open space connectivity.

The Parks and Open Space Element highlights the unique role that parks created around historic sites play in the Capital Region. The federal government is to "establish and preserve historic parks as important legacies of national, historic, architectural and landscape significance.
The Anderson cottage and two acres surrounding it have been designated a National Monument because of its importance in Lincoln and other 19th century presidencies. But as the DEIS notes, the importance of the AFRH site does not stop with this. To its immediate north is the first national military cemetery, predating Arlington National Cemetery. The AFRH itself has been in continuous use as a final home for members of the U.S. Armed Services since the middle of the 19th century. It is the U.S. equivalent of Les Invalides in Paris. Its central landscaped core and the agricultural land (now garden) of Zone 6 are essentially unchanged from the 19th century and provide a coherent and important historical context for the National Monument, cemetery and historically important home. The Elements are very clear about the importance of protecting just such landscapes from destruction.

The Parks and Open Space Element of the Federal Plan also commits the federal government to protecting terrain features of the region through careful design. In particular, it notes the importance of maintaining

vistas of the Monumental core of L'Enfant's city and protecting the escarpments that provide these overlooks. As the third highest point in the District of Columbia and one of the only undeveloped ones, the AFRH property is one of the areas that falls under the federal government commitment to protect "topographic bowl features."

The Preservation and Historic Features Element of the Comprehensive Plan for the National Capital: Federal Elements complements the Parks and Open Space Element. The Preservation and Historic Features Element is not limited to preservation of historic structures. A major concern is the "preservation and strengthening historic urban design features, such as the L'Enfant Plan." As part of this the Element commits to "protecting the character of the region's natural features, many of which have historical or cultural significance, such as ? the ridge of the topographic bowl, Agricultural land, ? and designed landscapes." All of these elements are present on the AFRH property and the alternatives do not seem to adequately take these into account. In particular plans to develop Zones 5 and 6 will disturb historically agricultural land that was an integral part of the function of both AFRH and the Anderson cottage, as well as disrupt the landscape of the topographic bowl. In particular, the Federal Plan calls for the federal government to "protect the skyline formed by the region's natural features, particularly the topographic bowl around central Washington" and to "protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital's image."

The Preservation and Historic Features Federal Elements set policies regarding federal government stewardship of historic properties and the historic plan of Washington, D.C. Under these Elements federal agencies
should:

.. protect the settings of historic properties, including views to and from sites where significant, as integral parts of the historic character of the property (p. 8); 2. protect the reservations that contain historic landscapes and features from incompatible changes or incursion; 3. protect views .. inward from vantage points along the rim of the topographic bowl from inappropriate intrusions. Open space should be preserved to allow for public use and enjoyment of these views. (Examples include ?the escarpment north of Florida, Ave. NW)..

The Parks and Open Space Element of the Comprehensive Plan for the National
Capital: Federal Elements directs the federal government to look to redevelopment of surplus federal property as a means of adding to the region's inventory of parks and open space and notes that future acquisitions could occur by purchase, easement, donation or exchange. An alternative that has not been included in the EIS is exchange of land in Zones 5 and 6 for other federal surplus land that could be more appropriately developed. Exchanging this land for land in another location and development there could provide needed financial resources for AFRH.
Zones 5 and 6 could then continue to play the important role they currently play in the District's system of federal open space by protecting historic landscapes, providing appropriate context for an

important historical site and protecting views of the central core of the capital as directed by the Federal Elements. If the land were transferred to the National Park Service to enlarge the Lincoln Cottage National Monument, this would not only preserve open space but would help protect the historical integrity of the setting for the cottage as a place of retreat and rest, thus preventing the kind of encroachment of inappropriate new development that has so adversely affected the Manassas Battle Field and other major Civil War historic sites. It would also enhance public access to much needed open space in the District as a whole as well as the adjacent neighborhoods. In addition, it may serve to substantially mitigate adverse environmental impacts of development on the eastern Zones 2, 3, and 4.

The District of Columbia Parks and Recreation is currently in the middle of a comprehensive planning process. As part of this effort they are conducting a survey of park and recreation needs indicating a significant deficit of park space in the Petworth, Park View, Columbia Heights area.
The AFRH property is a uniquely large landscaped open space -- one of the few remaining unprotected open space areas in the eastern part of residential Washington DC. The planning process should also be timed to accommodate consideration of the current comprehensive planning process of the D.C. Department of Parks and Recreation.

The location of a park in Zone 6 in the AFRH EIS would be easily accessible to dense development in neighboring Colombia Heights and to planned dense residential development along Georgia Avenue, as well as dense development planned for the rest of the AFRH site. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northwest and northeast D.C. #93

The open space already provided by AFRH is an integral design element of the adjacent Petworth and Park View rowhouse neighborhoods, developed in the early 1900s. Surrounding streets to the west of the Home were designed to take advantage of vistas of the open space provided by the Home's property. For example, the vista from Grant Circle down Illinois Ave to Zone 6 is an important anchoring design element in the eastern part of Petworth. The Preservation Element of the Federal Elements direct federal agencies to "protect reciprocal views along rights-of-way and from ?
circles (p. 11)." Replacing the vista of this green expanse that opens out over a view of the federal core of the city with a view of an eight story apartment building would significant harm the integrity of historic city plan in this part of the capital.

Among the alternatives, the DEIS has not considered alternatives that would provide significant parkland for the neighborhood to the west of AFRH. As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of Soldier's Home were developed in the early 1900s around the presence of the Soldier's Home as open space. #93

Thank you for your consideration of these comments. I am confident that adequate and appropriate consideration of the comments of all affected parties will produce a better end result for AFRH, its

residents, and the multitude of other city residents who will be affected by the proposed development.

Sincerely,

Abby Wahl
4126 Fifth St, NW

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Deborah Walsh
Address: 405 Rock Creek Church Rd
Affiliation: Home Owner
Phone: 202-723-7362

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☑ Yes ☐ No

Comments

I received a flyer two days ago. Why was I left out. This plan is not designed for the good of the internal or external community. This is about people making money and not about the men in this home needing money.

#42

Please send comments to:

Armed Forces Retirement Home
Attention: Donald Dailey
3700 North Capitol Street, NW
Washington, DC 20011
donald.dailey@afrh.gov

All comments must be postmarked by 6 July 2005.
For questions on the Draft EIS, please contact: Denise Decker (202) 205-5821

AFRH

[redacted]

AFRH-Washington Master Plan
Draft Environmental Impact Statement Comment Form

Name: Suzanne Welch, Dir of New Project Development

Address: 5101 16th St NW

Affiliation: Transitional Housing Corporation

Phone: 202-291-5535

Would you like to receive a copy of the Final Environmental Impact Statement for this action when it becomes available?

☒ Yes ☐ No

Comments

The EIS did not adequately address the housing demands and needs pressing on the District today. Affordable housing is in great demand and need, not embassy housing, hotels or high rise condo. Please consider the enclosed Housing in the Nation's Capital 2004 by the Urban Land Institute and Fannie Mae Foundation.

Where residential uses are considered at least 20% should be affordable for sale or for rent housing for low and moderate income families.

#43

Please ser

Transitional Housing Corporation

SUZANNE WELCH
Director, New Project Development

5101 16th Street, NW
Washington, DC 20011
t: 202.291.5535
f: 202.291.0192

swelch@thcdc.org
www.thcdc.org

me

W

6 July 2005

For questions on the Draft EIS, please ... ise Decker (202) 205-5821

Dear Mr. Dailey,

I know I have until July 6th, so here are my two cents. I'm a resident of Petworth and am a bit concerned that the Soldier's Home development decisions are being made too fast, and with only one public hearing. For what it's worth, here's a recent article in the NY Times that makes the case to proceed slowly, and with care, because 100 year-old trees won't shade our family picnics if they're paved over in a quick effort to make a profit. #63

Thanks for the opportunity.

Virginia Williams
Executive Producer/President
New View Films, LLC
4108 4th Street NW
Washington, DC 20011
O: (202) 722-7103
M: (202) 297-1777
www.newviewfilms.tv

IN THE REGION/Long Island; Forgoing Profits to Save Natural Beauty

By VALERIE COTSALAS
Published: April 10, 2005, Sunday
THE 15-acre Siena Spirituality Center at Villa Maria in Water Mill is surrounded by signs of Long Island's development boom: cars and trucks stream along Montauk Highway just outside the iron entrance gates, and jumbo McMansions and their landscapers' whining lawnmowers intrude from across the waters of Mill Creek, which borders 1,200 feet of the property.

The 612-member Sisters of the Order of St. Dominic owns the center but can no longer afford to maintain the 21,000-square-foot, 23-bedroom Beaux-Arts mansion, built in 1919; four other buildings; and the scenic grounds.

The order is seeking a buyer who will agree to preserve the property so that its beauty is not lost forever, as has happened at some estates and is threatened at others.

Only two sisters now live on the estate, once run as a school for young women and later as a retirement home for aging nuns. Today, the center is a nondenominational retreat used by a variety of organizations.

For reasons that go to the heart of their religious beliefs, the remaining sisters say, the order wants to add a restriction to the deed prohibiting subdivision of the property far into the future.

''The destruction of the natural world is the destruction of the human soul,'' Sister Margaret Galliardi said in a sunlit room overlooking the rear grounds and Mill Creek. ''The land is part of the mission; it's

important to us that the way we sell the land communicates what we believe.''

One buyer, whom the sisters would not identify, has offered $25 million for the estate and would keep its religious zoning, but brokers say the property would be worth at least $10 million more to a developer without the restriction. ''Real estate is the name of the game out here,'' said Robert Evjen, a listing agent with Prudential Douglas Elliman. ''It's the currency.''

Many owners have chosen to amass as much of that currency as they can. The ultrarich living on Long Island today take up less space than they did in the early 1900's, when robber barons built mansions on hundreds of acres along the Island's shores. Many celebrated Gold Coast and East End mansions have long since fallen into disrepair or been torn down altogether, their surrounding estates diced up into smaller parcels, each with a million-dollar home. Recent sales show that the trend continues.

''Those people who want the seclusion of a larger estate are not looking at the 20- to 30-acre parcels as being economically viable when they can live on a palatial estate of 3 acres,'' said Paul Bloom, a partner at the law firm of Harris, Bloom & Archer.

Mr. Bloom represents owners of estates in Sands Point, Kings Point and Lloyd Harbor who are planning to subdivide their properties. He would not identify the exact locations, but said they range from 16 to 34 acres.

Last November, a bidding war erupted over the 13-acre Land's End estate in Sands Point, built in 1902 and most recently owned by Virginia Payson, the widow of the industrialist Charles Shipman Payson.

Bert Brodsky bought the estate for $17.5 million, said Susan Stein, an agent at Accents on Real Estate, GMAC, who brokered the sale.

The estate sits on a peninsula with two private beaches and borders a 25-acre bird sanctuary. ''It's the most breathtaking property you've ever seen,'' Mr. Brodsky said in a telephone interview. He said he had hoped to restore the mansion and subdivide the land to build four additional 8,000-square-foot homes, one for each of his adult children.

But he forgot to check with the family first. ''Unfortunately, my wife doesn't want to live in the mansion,'' Mr. Brodsky said, ''and the kids don't want to live on the same block.''

A second plan was to join with a partner and build condominiums on the site, but Mr. Brodsky said the Sands Point Village Board of Trustees preferred the lower density plan. ''I don't want to fight with anyone,'' he said of the village, where he has lived for 37 years. He has gone back to the plan to build four more homes at the site and then to sell them and the mansion. But he has not yet submitted plans, he said.

As housing prices reach ever skyward, ''it becomes harder and harder to convince people to forgo the enormous profit that can be made in selling these properties,'' said Lloyd Zuckerberg, president of the

Nassau Land Trust, a land conservation organization that he founded in 2001.

The 145-acre Kirby Hill estate in Muttontown and the 155-acre Gordon Phipps estate in Old Westbury are both slated for subdivision, Mr. Zuckerberg said.

But as woodland spaces and green landscapes disappear at a rapid pace, conservation efforts arise from unlikely sources.

Mr. Zuckerberg, for example, is also a real estate investor and developer, and he said he tries to incorporate principles of land conservation into his projects on Long Island.

Making use of a federal tax deduction for landowners who give up development rights on land that borders a public road or a preserve or has other conservation value, Mr. Zuckerberg and a partner are planning to subdivide an estate in Nassau County, he said, but have given up 75 percent of the development right to the land. That means they will build far fewer homes on the land than the zoning allows.

''I think what we're creating on this land is going to be worth far more over time than if we chopped it up into 30 pieces cookie-cutter style,''
Mr. Zuckerberg said, not wanting to name the property until he has town approvals. ''This land will look in 100 years the way it looks today.''

Nassau and Suffolk Counties have acquired some old estates over the years, either as gifts from wealthy landowning families or by buying the properties outright.

One of the largest county owned preserves in Nassau is the 216-acre Sands Point Preserve, given to the federal government in the 1940's by the Guggenheim family and acquired in 1971 by Nassau County. The county spends about $1 million each year to maintain the preserve and its historic buildings, according to Michael Klein, a deputy county executive for Nassau County parks.

Suffolk County owns eight traditional estates, including the 43-acre Vanderbilt estate in Centerport, given to the county by the family in 1947.
The mansion is open to the public, and a planetarium built in 1970 holds sky shows and telescope viewings.

Both counties work with foundations and other organizations to find uses and caretakers for the estates.

''Restoration is an expensive thing, and it's almost a never ending thing,'' said Ronald Foley, the Suffolk County parks commissioner. ''You can get them to a state of repair where the restoration is complete, but they still need maintenance.''

In Southampton, the Sisters of St. Dominic have spent millions, Sister Margaret said, renovating the mansion over the last 74 years. Looking out the floor-to-ceiling windows in the sitting room, she remarked on the beauty of the grounds.

''When you look at this land, people think, 'O.K., what can we do with it?''' she said. ''Why not leave it?''

Published: 04 - 10 2005 , Late Edition - Final , Section 11 , Column 1 , Page 13

July 1, 2005

Donald Dailey
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011

Dear Mr. Dailey,

We are writing to take advantage of the brief period allowed for comments on the Armed Forces Retirement Home Draft Environmental Impact Statement (EIS). While we fully support the need to sustain the Armed Forces Retirement Home, we feel that the process has thus far lacked the opportunity for community participation.

According to the draft EIS, one objective of the AFRH Master Plan is to "ensure an open, participatory process with the AFRH-W residents and the community." To date, we do not feel that the community has been given the sufficient time or information needed to actively participate in this process. Few of us know of the June 22 meeting and even fewer of any prior steps. We would like the AFRH to extend and open this process and would also like to ensure that from here out, the AFRH be more transparent and take more active steps to ensure stakeholder participation. We would also like to ensure that a community representative participate in all meetings and that minutes and updates be shared monthly.

Thank you for the opportunity to provide comments at this phase of the process. We look forward to your consideration of and positive response to our concerns.

Sincerely,

[signature]	314 Shepherd St. N.W 20011
[signature]	320 Shepherd St. NW 20011
Laurie Lyon	4109 7th St. NW WDC 20011
Paul A Eckert	313 Shepherd St NW 20011
Minnie Green	4419-3rd St. W
[signature]	305 ROCK CREEK CHURCH RD NW.
[signature]	4409 3rd St NW

Cc: Congresswoman Eleanor Holmes Norton
Linda W. Cropp, Council Chair, Council of the District of Columbia
Jack Evans, Chair Pro Tempore
Jim Graham, Ward One
Adrian Fenty, Ward Four
Vincent Orange, Ward Five

M. Louise Adcock	316 Taylor St NW
[illegible] C [illegible] 208 Adcock	316 Taylor St NW FAX 202-723-[illegible] TEL 202-[illegible]
[illegible] / Letrice Bassin	311 Shepherd St NW
Carolyn Bryson	207 Taylor ST NW
Janice E. Williams	309 Taylor St, NW
Julie McCall	4005 4th St NW
[illegible]	131 [illegible] St NW 20011
[illegible]	4111 3rd ST NW 20011
[illegible]	4111 3rd ST NW 20011

Cc: Congresswoman Eleanor Holmes Norton
Linda W. Cropp, Council Chair, Council of the District of Columbia
Jack Evans, Chair Pro Tempore
Jim Graham, Ward One
Adrian Fenty, Ward Four
Vincent Orange, Ward Five

[illegible]	312 Shepherd St 20011

To Whom It May Concern:

We, the undersigned residents and homeowners of the Columbia Heights and Petworth neighborhoods of Washington, D.C., wish to register our strong concerns with the Environmental Impact Statement addressing the proposed development of the grounds of the Armed Forces Retirement Home.

We believe there are significant deficiencies in the report, and that insufficient consideration has been given to the possible impacts of large-scale development on the city and, especially, on the neighboring communities.

Specifically:

- The EIS masks the fact that the AFRH is proposing extremely dense development of park-like open space in the middle of a neighborhood that is disproportionately low income, elderly and African American (reference U.S. Census).
- The EIS understates the impact of large-scale development on traffic in the surrounding areas, including parking, increased traffic on major arteries, and increased traffic on narrow side streets now used by high concentrations of children and the elderly.
- Insufficient consideration is given to the impact of the local and regional environment, including air quality, ambient temperatures and the loss of mature trees and vegetation.
- Likewise, the EIS fails to adequately address the issues of water run off, including impacts on the Anacostia and Potomac Rivers, and effects on local properties and adjacent water table.

The EIS has considered only two alternatives: no development, or dense development on virtually the entire perimeter of the AFRH. It is not at all clear that the EIS has taken into account the Federal Elements of the Comprehensive Plan for the National Capital. In particular there appears to have been a marked inattention to the requirements addressing Park and Open Space and Preservation and Historic Features.

The Comprehensive Plan for the National Capital directs the government to look to redevelopment of surplus federal property as a means of adding to the region's inventory of parks and open space. In particular the AFRH and McMillan Reservoir to its immediate south are identified as areas to be preserved as open space and parkland. The EIS fails to address any addition to or preservation of public use land.

Nor does the EIS adequately address preservation of the unique historical role of the AFRH property. For instance:

- Plans to develop areas 5 and 6 of this property will disturb historically agricultural land that has been an integral part of the AFRH for a century-and-a-half.
- High-rise development along the peripheries of the property will destroy site-lines to and from the highest topography in the District.

We are disturbed that the EIS appears to have been developed with little or no consideration for the requirements of local and federal guidelines for such development, and without the participation and consent of neighboring communities.

In fact, it is not clear that the National Park Services actually received the EIS in time for meaningful comment. The District of Columbia Department of Parks and Recreation was not served with the EIS, and did not learn of the project until July 1, 2005 – just before the deadline for comment. Meanwhile, the Columbia Heights and Petworth communities immediately to the west, both with large and very active neighborhood organizations, were not informed until late in the process.

We fully support the goals of the AFRH and, in particular, take pride in hosting the men and women residents as our neighbors. We believe they, we and the residents of the District deserve better planning and a more thorough process for developing this unique green space in the heart of the Capital.

Please send this hasty and ill-conceived report back to the drawing board. We believe there are other alternatives – and better solutions – for the AFRH and for our communities. We stand ready to work with AFRH to develop workable ideas for the benefit of all.

Respectfully,

[illegible] 625 Princeton Pl NW
Frances W. Abrams 623 Princeton Pl, NW
[illegible] 755 Princeton Pl. NW
Shirley Lanhart – 740 Princeton Pl. N.W.
[illegible] 744 Princeton Pl. NW
Erica M.O. Lagerson 3649 Warder Street NW Wash. DC
[illegible] 737 Rock Creek Church Rd NW DC
Jennifer Sadette 703 Rock Creek Church Pl. NW

SERVICETRAC

June 28, 2006

Timothy Cox
Armed Forces Retirement Home
3700 N Capitol St NW
Washington, DC 20011-8400

Dear Timothy,

I would like to take this time to introduce ServiceTRAC. Like your organization, we pride ourselves in providing quality services and satisfaction management to the Senior Living Industry.

ServiceTRAC is a full-service research and marketing firm. For over 15 years ServiceTRAC has been helping the senior living industry improve Resident, Family Member, and Employee satisfaction and raise occupancy rates through marketing audits, satisfaction research, mystery shopping, and sales training. ServiceTRAC provides customer-focused solutions that provide our clients valuable information and actionable strategies to help sales professionals and managers achieve more success with their operations and marketing program.

Quality First seems to be the "buzz word" of choice within our industry. ServiceTRAC has taken it one step forward and integrated Quality First into our Satisfaction Survey process. ServiceTRAC has generated the ALFA Senior Living Satisfaction database, which is now the benchmark against which all U.S. Senior Living communities are measured. Our industry benchmarks and pioneering Value Report will give you the key to improving customer satisfaction. ServiceTrac's Satisfaction survey offers the following:

- COMPARISON TO NATIONAL INDUSTRY DATABASE: ServiceTRAC has partnered with the Senior Industry Associations and key leaders to build the industries largest and most reliable database. We increase the value of your results by placing them into context. The reports index your companies score averages to the industry database averages!

- ANONYMITY & OBJECTIVITY: ServiceTRAC offers your resident, family members and employees the peace of mind of anonymity and the ability to answer honestly to an objective third party. All research shows that the promise of anonymity and the involvement of an objective third party elicit more honest responses while eliminating positive response bias.

- RELIABLE QUESTIONNAIRE: During the design of our standardized questionnaire instrument, ServiceTRAC reviewed over 15,000 surveys! We then tested the instrument by conducting numerous focus groups with Resident/Employees, family members and employees. We are in the unique position to continually improve this survey instrument through ongoing research and customer feedback!

- ACTIONABLE REPORTS: ServiceTRAC takes an overwhelming amount of qualitative and quantitative data and delivers it to you in an easily understood and actionable format! The reports are accessible online 24x7.

- QUALITATIVE FOCUS: ServiceTRAC gets to the heart of Resident/Employee satisfaction by coding your Resident/Employees' actual comments into specific categories. This allows you to review the sentiments of your customers in a manageable manner. The verbatim section of the

report truly brings the survey results to life by relaying certain illustrative comments, word for word.

- TURNKEY PROGRAM: ServiceTRAC will handle the entire program from beginning to end. This means no management, data processing, report formulation or complicated data analysis by you. This leaves you time to do what you do best - take great care of your Residents and Employees.

- THE CREATION OF YOUR OWN DATABASE: ServiceTRAC will track your company's scores over time. Each time we conduct your ValueSat Resident/Employee Expectations-Based program, we will track and report trends along with changes since the last time you surveyed your Resident/Employees.

I would welcome the opportunity to schedule a telephone conference with you, Wilt Nowell (ServiceTRAC President and CEO), and myself to learn more about your organization, and discuss how ServiceTRAC can assist you. I look forward to the opportunity to answer any additional questions you may have. Thank you for your time and I look forward to speaking with you soon. Feel free to visit our website at www.servicetrac.com.

Sincerely,

Michael S. Miller
Chief Operating Officer
ServiceTRAC, LLC
800.951.6606
mike.miller@servicetrac.com
www.servicetrac.com

P.S. ServiceTrac is conducting a Sales Training Boot Camp in Scottsdale, AZ on September 21-23, 2005. To obtain more information, feel free to contact me to receive a copy of the brochure.

Washington
Hospital Center
MedStar Health

James F. Caldas
President

June 29, 2005

NOTE TO: Donald Daily

FROM: Linda V. Taylor
Executive Assistant to the President

Attached are the written comments from Washington Hospital Center for the Draft EIS.

If you need additional information or have any questions, I can be reached at (202) 877-6102.

Thank you.

110 Irving Street, NW, Washington, DC 20010-2975
phone: 202 877 6102 • fax: 202 877 7826 • e-mail: james.f.caldas@medstar.net

I appreciated the opportunity to attend the AFRH-Washington Master Plan Scoping Meeting held on September 9th and submit the following in order to document my comments at the meeting:

1. MedStar/WHC fully supports the concept of development of the property being proposed in the plan. As the owner and operator of the medical complex on land immediately to the south across Irving Street, we believe that appropriate development compatible with AFRH and neighboring uses is important for the efficient use of land to benefit the community and City as a whole. #20

2. This City has limited large tracts of land for development. When large parcels become available for use, a variety of possibilities should be considered that maximize the benefits to the community, both financially and substantively. Because of the character of the land use south of Irving, medical, educational, research and other related institutional uses should be considered. #112

3. The major street arteries adjacent to the site, such as North Capitol Street and Irving Streets and Michigan Avenue provide excellent access to the site. A relatively high density could be accommodated so long as residential areas to the northwest are protected. The characteristics of the site, with large open spaces, lend itself to appropriate urban development appropriate so as to counteract urban sprawl. Metro's Red Line is sufficiently close to the site that shuttle bus service benefiting all in the immediate community would reduce traffic. #233

4. The clinical and research components of MedStar/WHC's plan have a unique compatibility with the mission of the home and could assist in providing or coordinating development for this important site. In addition, the site would allow the expansion and renovation of WHC facilities, which can become a model for the delivery of medical services. #21

5. MedStar/WHC has the capacity and will pursue the opportunity to develop the entire property in an integrated and intelligent manner, respectful of the community and AFRH residents and guided by the leadership of AFRH. #22

6. The traffic impact identified in Alternative 2 overstates the projections Washington Hospital Center developed by a factor of 2. #234

Thank you for the opportunity to comment.

- We believe the Environmental Impact Analysis of ALT 2 overestimated total peak hour trip generation by a factor if 2+ forecast 21,268 trips vs. 8,983 trips.

#234

- The principal reasons for the over estimation were:
    - Use of junior/community college ratio for the area designated as medical education. This overstates the need by 6 times.
    - Does not account for replacement of existing trips (WHC move to AFRH takes traffic away from WHC campus).
    - Does not account for full impact of internal capture and transit - 2 Metro stops and 5 bus routes directly serving adjacent land use.
    - Does not recognize shift change hours for medical facilities vs. office users that mirror rush hour, i.e., clinical facility staff arrive before a.m. peak hour and leave before pm peak hour.
- Parking demand for ALT 2 was overestimated by a factor of 2. Note that NIH with a daytime population of 17,000 only provides 8,000 spaces on its 300 acre campus
- Suggest that prior to assigning final traffic impact, a more refined analysis be undertaken to more accurately predict future growth parameters – note also that the full development program is spread over a 15-20 year time frame. This allows for adjustments to be made in roadway configuration, mass transit utilization, internal traffic management, and development staging.

GOROVE/SLADE ASSOCIATES, INC.
1140 Connecticut Ave / Suite 700 / Washington, DC 20036

MEMORANDUM

TO: Theodore F. Mariani, F.A.I.A., P.E. CSD/Mariani

FROM: Michael P. Hurley
Louis J. Slade, P.E., P.T.O.E

DATE: June 21, 2005

SUBJECT: Analysis of Armed Forces Retirement Home Draft EIS

BACKGROUND

The US Armed Forces Retirement Home (AFRH) is considering the reuse of under-utilized portions of its campus in Northwest Washington, D.C. AFRH disposed of 49 acres on the east side of North Capital Street within the last year. Now, AFRH has identified an additional 112 acres that are located on the west side of North Capital Street that it wishes to dispose of. An environmental impact statement has been drafted that examines potential development scenarios for the 112 acres plus the land that is retained by AFRH. The Draft EIS analyzed the impact of three alternatives on surrounding roadways. Alternative 2 had the densest development of those proposed. This memorandum provides an evaluation of the trip generation assumptions for Alternative 2 contained in the Draft EIS. It is the opinion of Gorove/Slade Associates, Inc. (G/SA) that the Draft EIS transportation forecast greatly over-estimated the potential trip generation rates of the proposed development under Alternative 2.

G/SA analyzed a development proposal that was prepared by MedStar, which is interested in developing the 112 acres at AFRH. MedStar's proposal is similar to the development analyzed by the Draft EIS under Alternative 2, however, it proposes less development for a number of land uses. MedStar's development proposal contained 490,000 SF less for medical educational land uses, 100,000 SF less for retail land uses, 25,000 SF less for residential land uses, and 4,518 fewer parking spaces than Alternative 2 in the Draft EIS. In some instances G/SA used data similar to MedStar's development proposal to analyze assumptions made by the Draft EIS. The impact of the increased development proposed under Alternative 2 and the rational for using data similar to MedStar's development proposal are discussed below.

EXECUTIVE SUMMARY

G/SA analyzed three trip generation assumptions contained in the Draft EIS using the expected development intensity proposed under Alternative 2.

ITE *Trip Generation*, 7th Edition Coding. The Draft EIS calculated anticipated trips with the ITE *Trip*

Generation, 7th Edition equation for Junior/Community College based on 1,000 Square Feet Gross Floor Area. G/SA analyzed the impact of choosing this equation by calculating the anticipated trip generation rate of the educational facilities with the ITE *Trip Generation*, 7th Edition equation for University/College based on the anticipated number of students, faculty and staff that are expected to use the facilities. Table 1 illustrates that there is a significant difference in anticipated trip generation rates produced by the different ITE *Trip Generation*, 7th Edition equations. The Draft EIS anticipated 12,568 trips during the AM and PM peak hour, while only 2,366 trips for the AM and PM peak hour were forecasted with the *Trip Generation*, 7th Edition equation for University/College based on the anticipated number of students, faculty and staff; both numbers were reduced by the 12.5% to account for the internal capture and transit reductions rates anticipated by the Draft EIS.

Replacement of Existing Trips: G/SA analysis of the proposed development suggests that a percentage of existing trips to the Washington Hospital Center will likely travel to the proposed development. It appears that the Draft EIS did not account for this possibility when it calculated anticipated trips under Alternative 2. Table 2 illustrates the impact of this assumption on anticipated trip generation rates for the proposed hospital facilities. Assuming that 50% of existing trips generated by the Washington Hospital Center would travel to proposed development, which is the approximate amount of existing medical facilities that will be replaced by the proposed development, reduced the total AM and PM peak hour trips by approximately 1,300 trips. Additional reductions are likely to occur as adjacent facilites are replaced by new facilities within the proposed development.

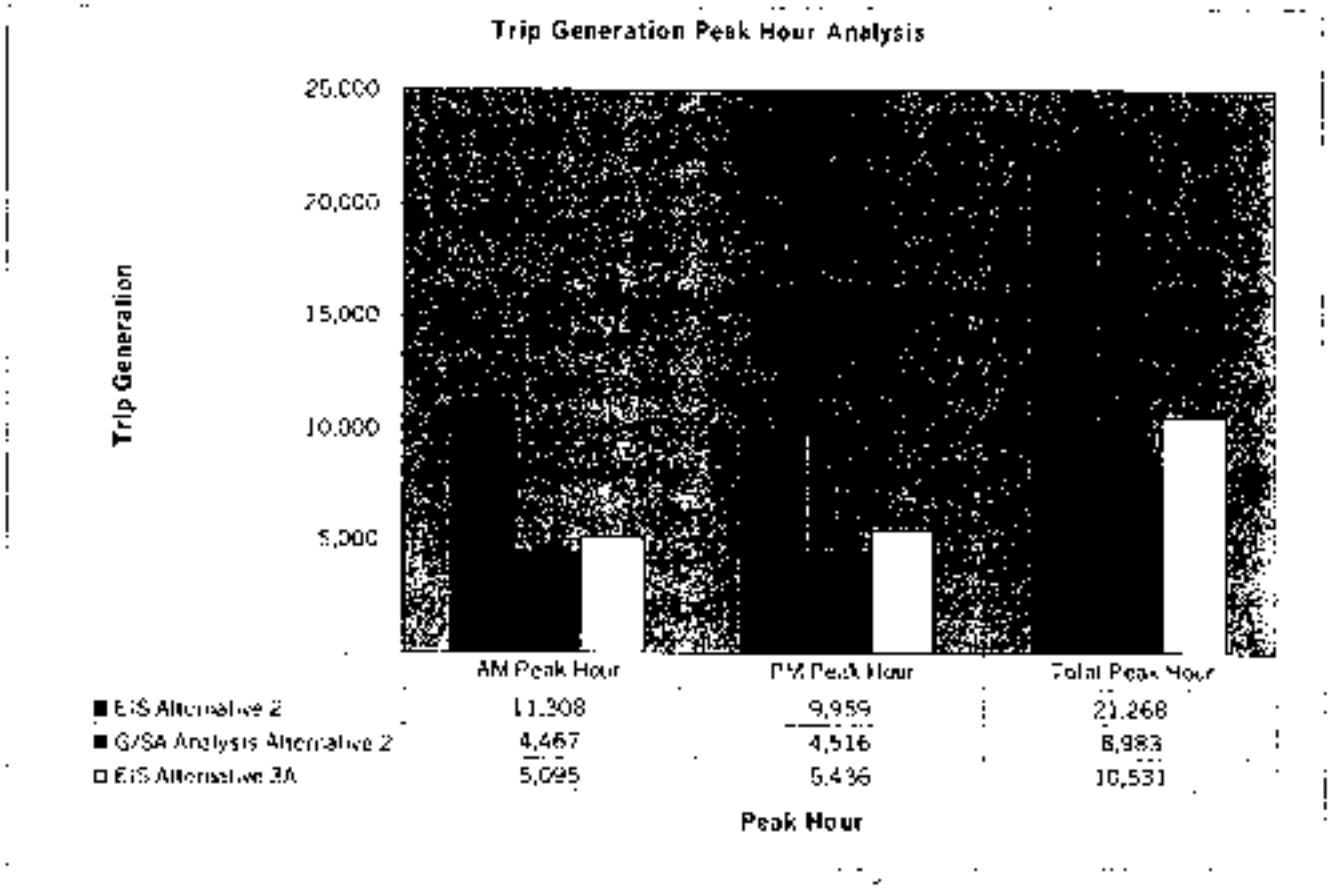
Internal Capture and Transit Reduction Rates: G/SA calculated the impact of the mixed used nature of the proposed development and its proximity to two Metro Stations and 12 Metro Bus routes, five of which directly serve existing adjacent land uses, would produce a higher internal capture and transit reduction rate than forecasted by the Draft EIS. Table 3 illustrates, increasing the reduction rate by 7.5%, to a total of 20%, would reduce total trips generated under Alternative 2 by an 3,217 trips during the AM and PM peak hour.

Impact: G/SA analysis of the Draft EIS suggests that there is sufficient evidence to conclude that the trip generation rates anticipated by the Draft EIS under Alternative 2 overestimated the impact of the proposed development at AFRH. G/SA analysis of the Draft EIS suggests that a total of approximately 12,000 fewer trips could be generated under Alternative 2 using the different assumptions outlined above. As Figure 1 illustrates, 21,268 total AM and PM peak hour trips were anticipated by the Draft EIS under Alternative 2 and 10,531 under Alternative 3A. Using the revised assumptions outlined in this draft memorandum, G/SA forecasted only 8,984 total AM and PM peak hour trips under Alternative 2. This represents nearly 58% fewer trips forecasted by the Draft EIS under Alternative 2 and 15% fewer trips than Alternative 3A. Additional reductions would likely occur under development conditions proposed by MedStar.

This suggests that the impact of Alternative 2 on the levels of service of surrounding intersections would

more closely approximate the impact anticipated by the Draft EIS under Alternative 3A, which contains 2 million fewer square feet of proposed development than Alternative 2.

Figure 1: Peak Hour Trip Generation



These findings suggest that additional detailed analysis should be conducted before concluding, as the Draft EIS did, that the development expected under Alternative 2 will have a direct, long-term, adverse impact on the surrounding intersections, especially because, as the Draft EIS states, "it is not uncommon for intersections in highly developed/urbanized areas like DC to experience poor levels of service during peak hours (4-54)." A more rigorous analysis of the anticipated trips generated by the proposed development under Alternative 2 would provide more accurate trip generation rates and a clearer understanding of the impact on surrounding intersections. Such an analysis would likely demonstrate additional reductions in trip generation rates and improved levels of service at surrounding intersections.

ITE *TRIP GENERATION*, 7TH EDITION CODING

The Draft EIS for the Armed Forces Retirement Home (AFRH) used the ITE *Trip Generation*, 7th Edition to forecast trip generation rates for the proposed development. Each alternative analyzed by the Draft EIS, as well as the MedStar proposal, dedicated land for medical educational facilities. Even if it were assumed

that a totally new medical center was fully developed, which is not likely, the population for medical educational land uses would not exceed 2,500, which includes students, faculty and staff.

To forecast trip generation rates for the proposed medical educational facilities at AFRH the Draft EIS used the ITE *Trip Generation*, 7th Edition equation for Junior/Community College based on 1,000 Square Feet Gross Floor Area. G/SA suspects that this code was used because the square footage of the educational land use was known by those drafting the EIS but not the number of students, faculty and staff. This may have also been the reason why the equation for Junior/Community College was used and not University/College. The ITE *Trip Generation*, 7th Edition has trip generation rates for Junior/Community College based on 1,000 Square Feet Gross Floor Area but not for University/College. Regardless of the reasons, G/SA believes a more accurate forecast of trip generation rates is produced using the ITE *Trip Generation*, 7th Edition equation for University/College Land Use based on the anticipated number of students, faculty and staff for the proposed facilities. The ITE *Trip Generation*, 7th Edition defines University/College land use as land that, "includes four-year universities or colleges that may or may not offer graduate programs," while it defines Junior/Community College land use that, "includes two-year junior, community, or technical colleges." G/SA analysis of the Georgetown University Medical Center suggests that it most closely approximates ITE *Trip Generation*, 7th Edition definition for University/College.

Table 1 illustrates the significant decrease in trips anticipated by the different ITE *Trip Generation*, 7th Edition equations. The trip generation rates listed in Table 1 were reduced to account for the anticipated internal capture and transit reduction rates predicted by the Draft EIS. The Draft EIS anticipated that the proposed educational facilities would generate 12,568 total peak hour trips under Alternative 2.

Calculating the trip generation rates for the proposed medical educational facilities with the ITE *Trip Generation*, 7th Edition equation using the actual number of anticipated students, faculty and staff reduced the number of trips generated under Alternative 2 by 56%. The decrease produced by the different ITE *Trip Generation*, 7th Edition equations within the same land use code suggests that the Draft EIS significantly overestimated the trip generation numbers anticipated under Alternative 2. Significant, additional reductions in trip generation rates are realized using the University/College ITE *Trip Generation*, 7th Edition equation. Trip generation rates were forecasted to decrease an additional 64% using the University/College ITE *Trip Generation*, 7th Edition equation while assuming the same number of students, faculty and staff. Using the University/College ITE *Trip Generation*, 7th Edition equation based on the number of students and faculty/staff decreased the number of total trips generated by medical educational facilities by 10,590, a reduction of 84%. This reduces the total anticipated AM and PM Peak hour trips generated for the proposed development under Alternative 2 by more than 50%. Table 1 and Figure 2 detail the significant differences in trip generation rates forecasted by different ITE *Trip Generation*, 7th Edition equations.

Table 1: Trip Generation - Education Land Use

Land Use	ITE Code	Size		Trip Generation						
				AM Peak Hour			PM Peak Hour			Daily
				In	Out	Total	In	Out	Total	Total
Junior/Community College	540	2,599,000	SF	5,751	2,013	6,795	4,816	2,763	5,773	12,568
Junior/Community College	540	2,500	Population	2,178	734	2,555	1,516	1,061	2,261	4,817
College/University	550	2,500	Population	780	173	944	374	976	1,134	1,978
Difference				4,042	1,840	5,951	3,442	1,845	4,639	10,590
Difference				1,389	561	1,711	1,142	143	1,128	2,839

REPLACEMENT OF EXISTING TRIPS

The Draft EIS forecasted anticipated trips for the proposed land uses under each alternative. It does not appear that the Draft EIS trip generation forecasted were adjusted to account for the number of existing trips to adjacent land uses that will travel to the proposed development. Specifically, approximately 50% of existing clinical facilities located south of the proposed development, across Irving Street NW, which is one of four access roads for the proposed development site, will be replaced by new facilities north of Irving Street under each development scenario analyzed in the Draft EIS. This suggests that approximately 50% of existing trips generated by the Washington Hospital Center and National Rehabilitation Hospital during the AM and PM peak period will travel to the proposed facilities using the same intersections. Adjusting anticipated trip generation rates to account for existing trips reduces the total anticipated trips generated under Alternative 2 by medical land uses during the AM and PM peak hours to 1,304 from 2,609. Table 2 illustrates the impact of removing existing trips from the trip generation rates anticipated by the Draft EIS under Alternative 2.

Table 2: Trip Generation - Hospital Land Use

Land Use	ITE Code	Size		Trip Generation						
				AM Peak Hour			PM Peak Hour			Daily
				In	Out	Total	In	Out	Total	Total
Hospital	610	1,600,000	SF	1,073	528	1,405	452	918	1,202	2,607
Hospital*	610	1,600,000	SF	536	265	702	226	459	601	1,304
Difference				537	264	702	226	459	601	1,304

* Assumes 50% of trips are existing trips

Accounting for existing trips to adjacent land uses will further improve the level of service of adjacent roadways and intersections. This is especially true of intersection 6 on Irving Street NW, which serves as the current and future entrance to the medical facilities on both sides of the road, because it reduces the number of autos entering and exiting the existing facility and proposed facility. A more detailed analysis of existing and proposed land uses would likely determine that additional existing trips were included in the anticipated trip generation rates detailed in the Draft EIS.

INTERNAL CAPTURE AND TRANSIT REDUCTION RATES

more than 8,000 parking spaces for employees and visitors, which results in a parking ratio of 0.46.

Consideration should be given to supplying parking at a lower ratio to encourage ride sharing and transit use. The model for this approach to demand management can be found in the Comprehensive Plan for the National Capital Region parking guidelines issued by the National Capital Planning Commission for Federal Agencies. While this development will not be a federal agency campus, it will have similar characteristics from a transportation standpoint and thus, these NCPC guidelines are a good starting point for a demand management program. Reducing the parking ratio could be expected to further reduce the total trips generated during the AM and PM peak hour.

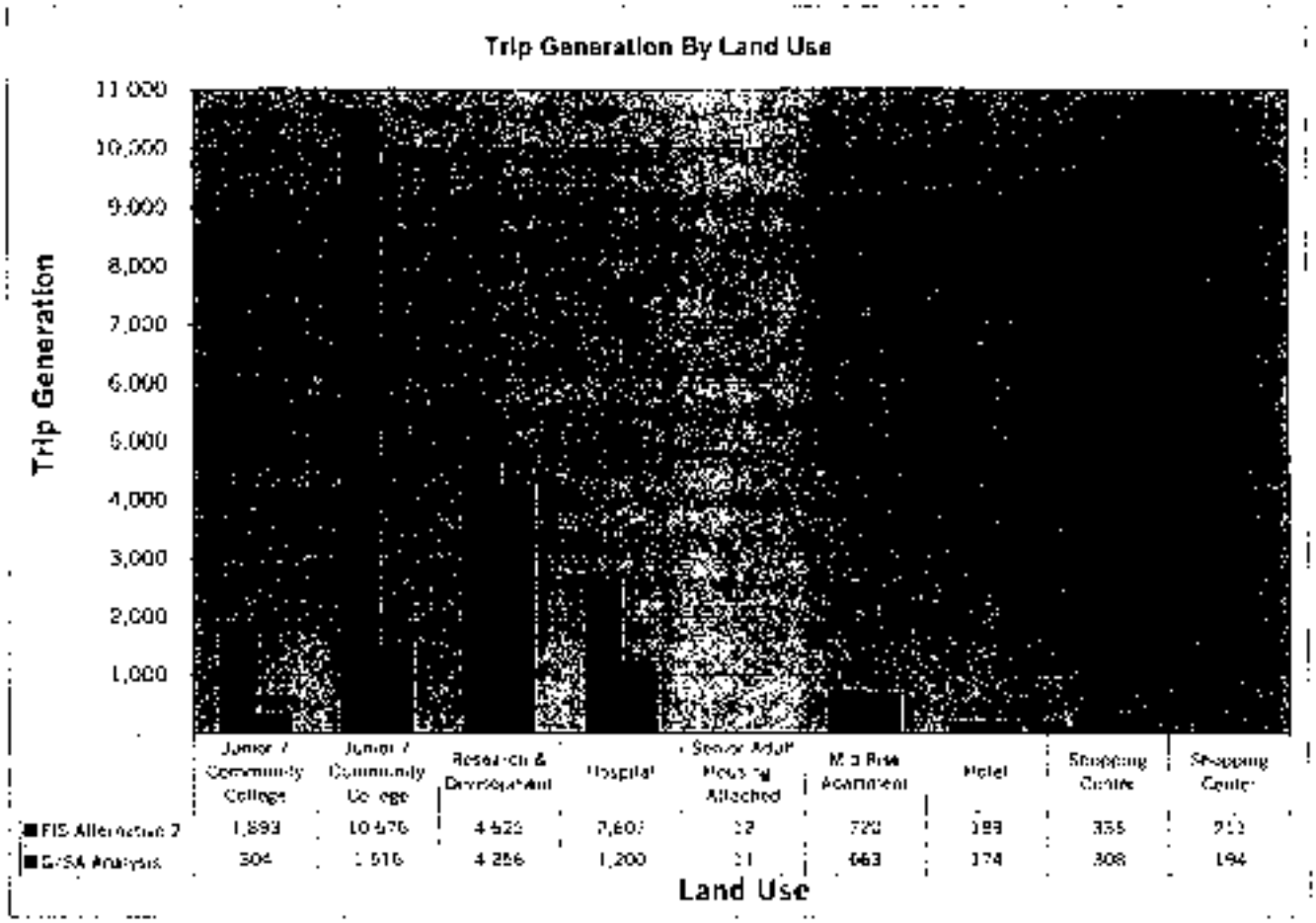
IMPACT

G/SA analysis suggests that the impact of Alternative 2 on the levels of service of surrounding intersections would more closely approximate the impact anticipated by the Draft EIS under Alternative 3A. The trip generation rates of Alternative 3A anticipated that only two intersections during the PM peak, North Capitol Street/Harewood Road and Irving Street/1st Street NW/Site Access, would operate at level of service below what DDOT considers adequate. The Draft EIS forecasted that trips generated under Alternative 2 would cause three intersections to fail during the AM and PM Peak hour.

According to the Draft EIS, Alternative 3A generated 5,095 AM peak hour tips and 5,436 PM peak hour trips. G/SA analysis forecasted only 4,516 trips during the PM peak under Alternative 2. These findings suggest that the level of service of surrounding intersections under Alternative 2 would be significantly improved. G/SA conducted a rough analysis of one intersection, North Capitol Street/Harewood Road, to determine the impact of different trip generation assumptions under Alternative 2. G/SA analysis indicates that the total delay anticipated by the Draft EIS under Alternative 2, 357 seconds, could decrease by approximately 150 seconds. In both scenarios the delay at these intersections is below what the District considers adequate, but, as the EIS states, "it is not uncommon for intersections in highly developed/urbanized areas like DC to experience poor levels of service during peak hours (4-54)."

Theses findings suggest that the Draft EIS greatly overestimated the trip generation rates anticipated under Alternative 2. A more rigorous analysis of Alternative 2 would provide a clear understanding of the impact of the proposed development and establish appropriate mitigation measure. Based on the findings outlined above, G/SA believes additional detailed study of the Draft EIS is merited.

Figure 2: Trip Generation by Land Use



Note: The Draft EIS under Alternative 2 assumed two separate development sites for Junior/Community College and Shopping Center.