

Armed Forces Retirement Home



AFRH-W Master Plan Amendment #1 National Historic Preservation Act (NHPA) Section 106 Consultation Summary

Consultation Period: November 14, 2017 – January 19, 2018

The following table summarizes all formal materials related to NHPA Section 106 Consultation for AFRH-W Master Plan Amendment #1 for inclusion of the Heating Plant Parcel in Zone A. AFRH followed the Section 106 Consultation procedures for Master Plan Amendments stipulated in the AFRH-W Programmatic Agreement.

Material	PA Procedural Reference	Date	Reference
Early Consultation Comment Summary	IV.C.2	12/6/17	Exhibit A
Signatory Consultation Meeting Summary	IV.C.3	12/6/17	Exhibit B
Summary of Revisions	IV.D.1	12/20/17	Exhibit C
Summary of Signatory Comments on Draft Amendment	IV.D.1	1/24/18	Exhibit D

Exhibit A

Armed Forces Retirement Home

AFRH-W Master Plan Amendment #1 Early Consultation - Consulting Party Comments

Comment Period: November 14 – November 30, 2017



The following table summarizes all formal comments received from Consulting Parties during the comment period for early consultation for Master Plan Amendment #1 for the inclusion of the Heating Plant Parcel in Zone A. The Early Consultation Memorandum for the proposed amendment was distributed electronically to Consulting Parties on 14 November 2017 pursuant to the process stipulated in the AFRH-W Programmatic Agreement.

Consulting Party	Date Received	Comment
Friends of the Soldiers Home	11/30/2017	See attachment A. “Friends of the Soldiers’ Home supports it.” No other comments related to the amendment.
Arlington National Cemetery	11/27/2017	See attachment B. “We support the proposed changes to adaptively reuse Building 46 and to include its associated parcel in AFRH’s redevelopment Zone A. As described in the proposed amendment and draft planning documents, ANC foresees no effects on the Soldiers’ and Airmen’s Home National Cemetery as a result of the changes to the Master Plan.”

Consultation Notes:

1. AFRH and its Master Plan Team had a call with the President Lincoln’s Cottage (PLC, Erin Carlson-Mast) on 17 November 2017 at the request of PLC. PLC was under the impression that the boundary change had already taken place and asked for clarification on the proposed amendment.
2. AFRH and its Master Plan Team had a call with the National Trust for Historic Preservation (NTHP, Betsy Merritt) on 20 November 2017 at the request of NTHP. The purpose of the call was to provide clarification on the documents provided, specifically the amended Programmatic Agreement.

ATTACHMENT A:
Letter from Friends of the Soldiers' Home



P.O. Box 3170
Washington, D.C. 20010

Nov. 30, 2017

Grace Dant
Executive Assistant to the Corporate Facility Manager
Armed Forces Retirement Home – Washington
3700 N. Capitol Street
Washington, D.C. 20011

Friends of the Soldiers Home is thankful for the opportunity to present the following comment on the proposed amendment to the Armed Forces Retirement Home-Washington (AFRH-W) Master Plan of 2008.

Since we are filing a comment for the first time in this process, I want to take an opportunity to tell you a little bit about Friends of the Soldiers Home.

Friends of the Soldiers Home, founded in November 2011, is a 501(c)(3) organization serving to strengthen the bond between the AFRH-W and the surrounding community. Through service, education and engagement, Friends connects citizens and veterans in a relationship that recognizes the sacrifice of military service and enhances quality of life for veteran and citizen alike.

In 2017, we have organized volunteers more than 50 times for service at the Home, including monthly Bowling, Happy Hour, Jingo and Saloon Night activities. Our sponsorship of Saloon Night, in which we supply pizza, drinks and entertainment, has been particularly popular with residents.

We also organized three festivals in 2017, Spring Fling, July 4 and Fall Fun Fest, which collectively brought nearly 5,000 people to the Home's campus. Our activities also include the annual garden program in which we pair residents with local grower volunteers, a bus trip for Home veterans to watch the Washington Kastles tennis team and a trash cleanup of the AFRH-W campus grounds. While our 2017 figures are not yet tabulated, in 2016, nearly 400 different community members

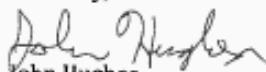
voluteered for AFRH-W through Friends of the Soldiers the Home. In our six-year history, we have organized volunteers for more than 250 activities at the Home.

We are proud of our service. We are grateful to Home residents and staff who have been so welcome toward us and our mission. The spirit of gratitude and friendship that has permeated the relationship has healed many divisions that erupted during the Master Plan process from 2004 to 2008.

As for the Master Plan amendment, Friends of the Soldiers Home supports it. The amendment changes the boundaries of Zone A to include three additional acres referred to as the "Heating Plant Parcel," adopts Zone A guidelines for the parcel and changes potential uses of structures within the parcel.

Finally, we are pleased that from early 2014 until the end of 2016, Friends of the Soldiers Home and AFRH-W's Resident Advisory Committee Master Plan Subcommittee jointly operated a Community Access Project (CAP) Committee. This initiative examined the possibility of opening regular public access to the southwest parcel of the Home's campus for the benefit of residents and the community. This CAP group worked cooperatively in the spirit of the National Capital Planning Commission's July 2008 approval of the Master Plan and made significant progress. We look forward to a revitalization of the CAP under the leadership of the new AFRH Chief Executive Officer who began service in November of 2017.

Sincerely,



John Hughes

Chairman, Friends of the Soldiers Home



ATTACHMENT B:
Email from Arlington National Cemetery

From: Stevens, Rebecca L CIV (US) <rebecca.l.stevens35.civ@mail.mil>
Sent: Monday, November 27, 2017 11:37 AM
To: Grace Dant
Cc: Peloquin, Michael D COL USARMY HQDA ANC OSA (US)
Subject: MPA #1 Comments

Ms. Dant,

Arlington National Cemetery (ANC) appreciates the opportunity to participate in the Section 106 early consultation process for the proposed amendments to the Armed Forces Retirement Home (AFRH) Master Plan.

We support the proposed changes to adaptively reuse Building 46 and to include its associated parcel in AFRH's redevelopment Zone A. As described in the proposed amendment and draft planning documents, ANC foresees no effects on the Soldiers' and Airmen's Home National Cemetery as a result of the changes to the Master Plan.

Please keep ANC on the Consulting Parties list for review and comment on the proposed Master Plan Amendment.

Sincerely,

Rebecca L. Stevens, AIA
Cultural Resources Manager
Arlington National Cemetery
1 Memorial Avenue, WC Building
Arlington, VA 22211-5003
703.614.3619 (desk)
571.429.0616 (cell)

Exhibit B

ARMED FORCES RETIREMENT HOME

Master Plan Amendment #1 Signatory Meeting

Date: 6 December 2017
Time: 1:00pm
Location: Conference Call

Attendees

PA Signatories

Kathryn Smith (NPS)
Tim Dennee (DCSHPO)
John Gerbich (NCPC)
Lee Webb (NCPC)
Katharine Kerr (ACHP)

AFRH Representatives

Justin Seffens (AFRH)
Tim Scheckler (GSA)
Martine Combal (JLL)
Brian Brussel (JLL)
Carrie Barton (PRESERVE/scapes)

AGENDA

- I. Review Purpose and Scope of Amendment
- II. Review Amendment Process
- III. Review Consulting Party Comments
- IV. Discuss Signatory Comments
- V. Discuss Next Steps and Timeline



DISCUSSION

1. DCSHPO had concerns regarding the applicability of new construction design guidelines to the parcel. DCSHPO thinks this could create confusion regarding whether new construction is allowed on the parcel or whether those guidelines are applicable to the treatment of the historic building. NPS agreed with these concerns.
 - a. AFRH stated that there is a preference to be explicit about the adoption of all guidelines that apply to Zone A to ensure that all potential actions are covered in the future, even if those actions require additional Master Plan Amendments.
 - b. GSA reiterated that this is a matter of ensuring consistency and that guidelines are currently applicable to the zone, not to specific parcels.
 - c. NCPC stated that the level of detail provided in the current outline may not be necessary but that some type of reference to the applicable standards is preferable but will discuss this internally and get back to AFRH on a potential solution.
 - d. DCSHPO reiterated a desire not to explicitly address the design guidelines.
2. NPS inquired about the review process for Zone A.
 - a. AFRH clarified that any new construction or adaptive use in Zone A would go through the Historic Preservation Review Board based on the design review process outlined in the Programmatic Agreement (PA) and the Historic Preservation Plan (HPP).
3. DCSHPO is concerned that there is not an explicit reference to the Secretary of the Interior's Standards for the Treatment of Historic Properties ("SOI Standards") in the addendum.
 - a. AFRH stated that the SOI Standards would apply based on the applicability of the PA and the HPP, as well as the textual change proposed in adding the Contributing Buildings to the list of historic buildings proposed for reuse based on the SOI Standards.
 - b. NCPC stated it would be okay either way (applicability of the SOI Standards based on the PA or explicitly stating the applicability of the SOI Standards in the addendum).
 - c. AFRH stated the intention to address this concern through specific text revisions in the upcoming draft.
4. DCSHPO and NPS were concerned about whether the amendment is allowing for new construction on the Heating Plant Parcel. The memorandum states that there will not be new density, but AFRH believes that design guidelines are needed in the case that new construction occurs.
 - a. AFRH stated that, for instance, new construction could potentially occur on the footprint of Building 70 if it is demolished.
 - b. NCPC requested a more explicit explanation of what is allowed and what is not allowed in the addendum.
 - c. AFRH agreed to look at further clarifications but stated a preference to not be more prescriptive than other parts of the Master Plan. New construction has

been allowed on the footprint of demolished non-contributing buildings (i.e. the Scott Building) without requiring a Master Plan Amendment, but this was not specifically addressed in the Master Plan. In other words, new construction is already possible on the footprint of Building 70 without a master plan amendment, so this amendment would only change who would be likely to propose it and how it will be reviewed.

5. DCSHPO requested that the addendum should include revised graphics for the Fence/Perimeter and Street Types. Currently, the addendum includes these two graphics in the list of graphics that may be revised “as determined necessary through consultation.”
 - a. AFRH agreed and stated that new graphics would be created.
6. DCSHPO stated that there could potentially be adverse effects, particularly because of the streets and fence line and the additional area incorporated by private development. There could be other adverse effects, as well, which would make this amendment more complicated than a simple redrawing of the line.
 - a. AFRH requested that any potential adverse effects resulting from the application of Zone A guidelines on this parcel (including the fence guidelines) be identified and resolved as part of this consultation process. Future potential adverse effects based on specific proposed designs should be resolved through the design review process.
7. DCSHPO and AFRH clarified the purpose of Undertaking Review Request (URR) 40, which addressed the ground lease of the Heating Plant Parcel. As stated in the URR, the agreed upon standards and required covenants are applicable to the private use of the Heating Plant whether through an individual ground lease or through a Master Ground lease for Zone A.
8. AFRH addressed confusion over whether this is an amendment to the PA or to the Master Plan. The proposed amendment is an amendment to the Master Plan that will be reviewed by the National capital Planning Commission. The current consultation process is the Section 106 process for the amendment, which is stipulated in the PA.

NEXT STEPS

- AFRH will follow up on outstanding questions with NCPC and DCSHPO.
- AFRH intends to distribute a draft amendment to the signatories to review in December.
- The signatories have a 30-day review period to provide comments to AFRH on the draft.
- AFRH will incorporate comments from the signatories into a final amendment, which will be submitted to NCPC for review.

Exhibit C

ARMED FORCES RETIREMENT HOME

Master Plan Amendment #1

Response to Consultation

20 December 2017



The draft Master Plan Amendment #1 (20 December 2017) addresses comments received from Signatories during consultation as follows. Please refer to the meeting summary from 6 December 2017 for a review of issues raised during consultation.

- 1. SOI Standards:** References to the SOI Standards are provided in the specific text revisions and reiterated in the summary text on the first page of the addendum.
- 2. Guidelines:** The guidelines section has been revised to state that the new parcel adopts all relevant Zone A guidelines. The additional text regarding specific guidelines has been removed.
- 3. Boundary:** The boundary for the Heating Plant Parcel has been modified on the north side to simplify the geometries of the zones. The boundary now flattens at the top rather than coming to a point, eliminating the small sliver of land that would have remained in AFRH control between the road on the perimeter fence. There are no historic landscape resources affected by this change.
- 4. Street Types:** The revised street type graphic shows the use of street types that minimize the impact to adjacent landscape resources, namely Chapel Woods East. Street type 3A is proposed on the west side of the Heating Plant to minimize or potentially avoid widening of the existing lanes. The developer may have flexibility to add a sidewalk, street parking, or other additional streetscape elements within the ROW if they can show through HPRB design review that they can avoid effects on historic resources, but the street type itself does not require additional elements beyond the cart way. Street type 3B is used on the east side of the Heating Plant where there is more space and no existing landscape resources. Please note that there is currently surface parking and roadway on both sides of the Heating Plant, so these are all modifications to existing circulation rather than the introduction of new circulation.
- 5. Perimeter:** The fence line shows the new boundary fence following the perimeter of the new parcel, and the new parcel will adopt the same design guidelines for perimeter treatments as are currently provided in the sitewide guidelines for the campus. As with the other sections of the fence, the selected developer will be required to go through design review with HPO and HPRB and follow the SOI standards and other treatment standards stipulated in the HPP, as well as the tree replacement requirements stipulated in the Master Plan and PA. Because potential effects will be dependent on the proposed design and construction of the fence, specific impacts on the landscape must be addressed during design review as they will be for all other sections of the fence path.
- 6. Landscape Preservation:** To further address the concerns about the potential impacts of the fence line and roadways on the landscape, additional text is provided for the Zone A treescape guidelines to ensure the protection of adjacent landscape resources in the design of perimeter treatments and infrastructure.

- 7. Use:** The land use proposed for the parcel is commercial with assumed retail. This is consistent with the traffic study that is included in the draft SEIS.
- 8. Phasing:** The parcel and associated infrastructure are included in development Phases 1 and 2, consistent with the phasing for other parcels with historic resources in Zone A.
- 9. New Construction:** The amendment clearly states that no additional density or height is allowed on the site and that build-to lines are consistent with existing building footprints. As with other sections of the Master Plan, an amendment would be required to change that. As was shown through the precedent set by the demolition and replacement of the old Scott Building, new construction is currently possible on the footprint of Non-Contributing buildings, regardless of where they are located on campus. The transfer of this parcel from the AFRH Zone to Zone A does not change what is possible in terms of new construction on the parcel.

Exhibit D

Armed Forces Retirement Home

AFRH-W Master Plan Amendment #1 Summary of Signatory Comments on Draft Amendment

Comment Period: December 20, 2017 – January 19, 2018



The following table summarizes all formal comments received from the AFRH-W PA Signatories during the comment period for the draft of Master Plan Amendment #1 for the inclusion of the Heating Plant Parcel in Zone A. The draft of the proposed amendment was distributed electronically to Signatories on 20 December 2017 pursuant to the process stipulated in the AFRH-W Programmatic Agreement.

Signatory	Date Received	Comment	Revision to Final Master Plan
National Park Service (NPS)	1/19/2018	No comment. See Attachment A.	n/a
National Capital Planning Commission (NCPC)	1/18/2018	See attachment B.	No other comments received regarding a potential adverse effect of the fence line and no additional revisions made; through the inclusion of guidelines specific to the fence's impact on the historic landscape, AFRH intends for future design review of the fence to further minimize any potential effects of the fence on the Historic District.
DC State Historic Preservation Office (DCSHPO)	n/a	No comment received.	n/a
Advisory Council on Historic Preservation (AHP)	n/a	No comment received.	n/a

ATTACHMENT A:
Email from NPS

MPA #1 - Early Consultation Memorandum Materials

Smith, Kathryn <kathryn_smith@nps.gov> Fri, Jan 19, 2018 at 10:01 AM
To: "Justin.Seffens" <Justin.Seffens@afrh.gov>
Cc: Carrie Barton <carrie.barton@preservescapes.com>, "kathryn_smith@nps.gov" <kathryn_smith@nps.gov>, "diane.sullivan@ncpc.gov" <diane.sullivan@ncpc.gov>, "david.malone@dc.gov" <david.malone@dc.gov>, "timothy.dennee@dc.gov" <timothy.dennee@dc.gov>, "kkerr@achp.gov" <kkerr@achp.gov>, Perry Wheelock <perry_wheelock@nps.gov>, "Webb, Lee" <lee.webb@ncpc.gov>

Mr. Seffens,

The National Park Service, National Historic Landmark Program has no comments on the NHPA Section 106 Review for the AFRH-W Master Plan Amendment #1. It appears that the proposed changes will not affect the National Historic Landmark designated U.S. Soldiers' and Airmen's Home which is a portion of the AFRH.

Thank you for providing us the opportunity to review and comment.

Best,
Kathryn

Kathryn G. Smith

National Historic Landmarks & National Register Coordinator
National Capital Region, National Park Service

1100 Ohio Drive, SW
Washington, DC 20242
202.619.7180
202.401.0017 fax

kathryn_smith@nps.gov

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

Facebook National Historic Landmark Program - NPS

Instagram NationalHistoricLandmarkNPS #NationalHistoricLandmark #FindYourPark
[Quoted text hidden]

ATTACHMENT B:
Letter from NCPC¹



401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel 202.482.7200 Fax 202.482.7272 www.ncpc.org

IN REPLY REFER TO:
NCPC FILE No. MP060

January 18, 2018

Mr. Justin Seffens
Armed Forces Retirement Home
Sherman Building; Office 210
3700 North Capitol Street, NW
Washington, DC 20011

Re: NHPA Section 106 Review of AFRH-W Master Plan Amendment

Dear Mr. Seffens:

Thank you for the opportunity to provide comments on the Draft Master Plan Amendment, which was distributed for review in accordance with the Programmatic Agreement (PA) for the Armed Forces Retirement Home (AFRH) Master Plan. We understand that the amendment is being developed to modify the development zone (Zone A) boundary to include the heating plant and associated outbuildings, collectively known as Parcel U, which also includes a modification to the proposed fence line that separates Zone A from the AFRH Zone.

The amendment notes that four buildings are affected by this change, including three structures that contribute to the AFRH-W Historic District, and one that does not. Per the requirements of the original master plan and the current amendment, the contributing buildings will be adaptively reused and rehabilitated consistent with the Secretary of the Interior's Standards for Rehabilitation and other standards and guidelines outlined in the PA and AFRH Historic Preservation Plan, while the non-contributing building may be demolished. The larger framework for development in the original master plan stipulates that no additional density will be allowed in Zone A, including Parcel U, but that non-contributing buildings that are demolished may be reconstructed on the same footprint to the height, bulk, and massing of the existing buildings. This and other development guidelines will ultimately be formalized when the property is zoned by the District of Columbia Zoning Commission, per the process outlined in a 2008 Memorandum of Understanding (MOU) between the National Capital Planning Commission (NCPC), District of Columbia Office of Planning, and AFRH.

With regard to historic preservation, NCPC staff echoes concerns raised by other consulting parties regarding the modified fence line, which, as proposed, skirts the contributing structures that will be retained on Parcel U. AFRH should consider how relocation of the fence affects these contributing structures, as well as the secondary effect of separating these resources from the larger AFRH-W Historic District to which they contribute. Should the District of Columbia State Historic Preservation Office or other consulting parties consider the relocation of the fence an adverse effect, we look forward to discussing potential measures to avoid, minimize, or mitigate this and any other effects. While they represent a change from current conditions in the area, NCPC staff does not have major preservation concerns regarding the proposed landscaping or street modifications. The

¹ Note that the letter references four buildings and three Contributing structures affected by the amendment; the Heating Plant Parcel includes only three buildings and structures, two of which are Contributing. This clarification has been confirmed by AFRH with NCPC.

Mr. Justin Seffens

Page 2

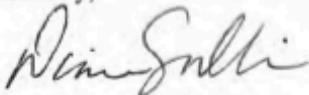
landscaping guidelines were approved for all buildings as part of the original Section 106 consultation process, and the proposed street types (3A and 3B) are consistent the dimensions and character of the existing road network in the area.

NCPC staff appreciates the effort to provide clarity regarding the extent of changes allowed to contributing and non-contributing buildings on Parcel U in the amendment, as well as the comprehensive way in which such changes are outlined in the provided revision tables and maps. To assist the Commission with review, staff requests that the amendment is appended to the original master plan, and that the cover page and table of contents are replaced, to ensure that we have the complete master plan, as amended, on file.

As an additional note, staff has noticed that the amendment proposes that the boundary fence traverses a portion of land that will remain in the AFRH Zone (see Access and Security Plan [pg. 130]). Per the terms of the 2008 MOU, the majority of the fence will be subject to local regulatory controls; however, the portion of fencing that crosses the AFRH Zone will be subject to NCPC review under its in lieu of zoning authority pursuant to the National Capital Planning Act (40 U.S.C. 8122(b)(1) and (d)). Please plan to submit this portion of fence for NCPC review as final plans are developed.

Again, we appreciate the opportunity to review the document, and look forward to Commission review of the final amendment. If you have any questions regarding our comments, please contact John Gerbich at 202.482.7235 or john.gerbich@ncpc.gov.

Sincerely,



Diane Sullivan, Director
Urban Design and Plan Review Division

cc: Tim Sheckler, Director, Real Property Utilization and Disposal Division, US General Services Administration
Carrie Barton, Consultant, PRESERVE / scapes
David Maloney, State Historic Preservation Officer, District of Columbia Historic Preservation Office, District of Columbia Office of Planning
Tim Dennee, Architectural Historian, District of Columbia Historic Preservation Office, District of Columbia Office of Planning
Kathryn Smith, National Historic Landmarks and National Register Coordinator, National Capital Region, National Park Service
Katharine Kerr, Program Analyst, Advisory Council on Historic Preservation