



Armed Forces Retirement Home  
Office of the Chief Operating Officer  
3700 N. Capitol Street, P.O. Box 1303  
Washington, DC 20011-8400

**ARMED FORCES RETIREMENT HOME-WASHINGTON  
RESIDENTIAL AND MEDICAL FACILITIES  
CONSOLIDATION AND MODERNIZATION**

**FINDING OF NO SIGNIFICANT IMPACT  
WASHINGTON, DC**

**FINDING**

In accordance with the National Environmental Policy Act (NEPA) Council on Environmental Quality Regulations for Implementing NEPA (40 CFR Parts 1500-1508) and Armed Forces Retirement Home's Compliance with NEPA (38 CFR Part 200), I find that the proposed consolidation and modernization of residential and medical facilities on the campus of the Armed Forces Retirement Home – Washington, as described in the attached Environmental Assessment, are not major federal actions significantly affecting the quality of the human environment. Therefore, an Environmental Impact Statement will not be prepared.

APPROVED: Timothy Cox

Date: 4/2/10

Mr. Timothy Cox  
Chief Operating Officer  
Armed Forces Retirement Home

*This FONSI will become final 30 days after publication of its Notice of Availability in the Washington Post, provided that no information leading to a contrary finding is received or comes to light during the 30-day review period.*

## **BASIS FOR FINDING**

AFRH prepared an environmental assessment (EA) analyzing the environmental impacts that could result from consolidation and modernization of residential and health facilities at the Armed Forces Retirement Home – Washington (AFRH-W). The EA was prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality Regulations for Implementing NEPA (40 CFR 1500-1508), and the Armed Forces Retirement Home's Compliance with the National Environmental Policy Act (38 CFR part 200). The EA documents the direct, indirect, and cumulative impacts for two action alternatives and a No Action alternative.

The environmental issues addressed in the EA were identified through early public involvement (scoping), which included consultations with federal and local agencies and other stakeholders. The Final EA responds to comments and concerns received during the 30-day public review. The Final EA is incorporated by reference into this Finding of No Significant Impact (FONSI).

## **PURPOSE OF AND NEED FOR THE PROPOSED ACTION**

The purpose of this project is to modernize and consolidate AFRH-W residential and health functions in the central core of the campus. The project is needed to provide a facility that meets the changing needs of the AFRH-W's current and future residents and to increase operational and programmatic efficiencies.

## **DESCRIPTION OF ALTERNATIVES**

Three alternatives were considered in detail in this EA: two action alternatives and a No Action alternative. The alternatives are summarized below. Complete descriptions of the alternatives are included in Chapter Two of the Final EA.

### **Elements Common to Both Action Alternatives**

Both action alternatives (Alternatives A & B) call for the controlled demolition of the existing Scott Building and construction of a new smaller scale building in its current location. In order to avoid disruption in utility service during demolition of the Scott Building, both action alternatives would necessitate relocating the information technology (IT) center to the basement of the Sherman Building and chiller equipment to the Sheridan Building. A cooling tower for the chiller would be constructed in the northeast corner of a parking lot that is adjacent to the Sheridan Building.

### **Alternative A**

Under Alternative A, the new Commons and Healthcare building footprint would result in a reduction of 30,652 square feet from the current Scott Building's footprint. Overall, the massing of the new building would represent a 201,446 gross square foot (gsf) reduction from the current Scott Building. The design would maximize programmatic and spatial adjacencies by stacking the healthcare functions above the commons functions. The footprint of Alternative A is centered on the north-south axis formed by the Sherman and Grant Buildings to the north, acknowledging and strengthening the formal relationship with the surrounding campus.

The height of the building would be three stories as seen from the quadrangle, with an additional below-grade story that would open to view as the grade of the site drops to the south. The massing of the building forms a series of green terraces that step down to the south, which reflects the transition of the site from the formal quadrangle to the north to the picturesque character of the officers' quarters and Meadow to the south and southwest. This design and orientation would create unobstructed southward views of downtown Washington for the residents and would restore the historic viewshed from the Lincoln Cottage.

### **Alternative B**

Under Alternative B, the new Commons and Healthcare Building would be expressed as two separate building masses. These separate masses would create a building footprint that is 22,901 square feet less than the existing Scott Building footprint. Overall, the massing of the new building would represent a 190,816 gsf reduction from the current Scott Building. The height of the two building masses would be two stories as seen from the quadrangle, with an additional below-grade story that would open to view as the grade of the site drops to the south. Although the primary building masses are placed to the east of the site and outside the southward viewshed from Lincoln Cottage, an above-ground terrace element to the west of the building would obscure a section of the historic view toward downtown Washington, D.C. The long dimensions of the two masses would run north/south so that their short ends face the quadrangle. These short ends are similar in width to the east and west wings of the Sherman Building. The area between the two masses would create an exterior courtyard. Alternative B would provide a less-formal relationship with the historic Sherman Building than Alternative A by virtue of its smaller height, north/south length, segmented massing, and smaller defined edge to the south side of the quadrangle.

### **Alternative C: No Action Alternative**

Under the No Action Alternative, the existing Scott Building would remain as a building that is too large, inefficient, and outdated for AFRH's needs. The No Action Alternative would not provide modernized facilities that meet the changing needs of the AFRH-W residents. Healthcare and residential functions would not be consolidated into the central core of the campus and would instead remain dispersed throughout the 272 acres of AFRH-W.

The No Action Alternative also does not provide the opportunity to improve the historic Lincoln Cottage viewshed and construct a building on the site that is more compatible with the historic architectural context of the campus. Further, the No Action Alternative does not improve energy efficiency, stormwater management, or open space. The No Action Alternative would not meet the purpose and need of the proposed action.

### **ALTERNATIVE SELECTED FOR IMPLEMENTATION**

While both action alternatives meet the purpose and need of the proposed project, AFRH has selected Alternative A for implementation because it provides the greatest overall improvement to residents and facility operations. Specifically, Alternative A will restore the historic viewshed from the Lincoln Cottage; achieve contextual design and

compatibility with the historic character of the surrounding AFRH-W Historic District and the immediately adjacent National Historic Landmark; provide the most efficient travel distances within the building for residents and staff; introduce the greatest amount of pervious surfaces at the proposed site; and be the most cost effective to maintain and operate.

## **ENVIRONMENTAL CONSEQUENCES**

The EA analyzed the impacts of each alternative on the natural and man-made environment. This section summarizes the impacts associated with implementing Alternative A. A full description of impacts and mitigation measures for each alternative can be found in the Final EA.

In addition to the resource issues summarized below, additional issues were considered for evaluation at the outset of the process. These additional issues were ultimately eliminated from detailed study within the EA because there would be no impacts or impacts would be negligible. Resource issues dismissed from detailed study include: economic and fiscal resources; environmental justice; geology and soils; and wildlife.

### **Impacts from Building Demolition, Construction, and Operations:**

Archeological Resources: No impact

Historic Resources (including Views and Vistas): Moderate, long-term, beneficial impact

Land Use: Minor, long-term, beneficial impact

Planning Policies: No impact

Open Space: Minor to moderate, long-term, beneficial impact

Topography: Minor, short-term, adverse impact during construction; no long-term impact during operation

Vegetation: Minor, long-term, beneficial impact

Water Resources: Minor, short-term, adverse impacts during construction; minor, long-term, beneficial impacts during operation

Vehicular Circulation (internal campus): Moderate, short-term, adverse impacts during construction; no long-term impact during operation

Parking: Minor, short-term, adverse impacts during construction; negligible, long-term, adverse impacts during operation

Public transportation: No impact

Pedestrian/Bicycle Transportation: Minor, short-term, adverse impact during construction; no long-term impact during operation

Utilities: Negligible, long-term, adverse impact

Energy and Environmental Performance: Moderate, long-term, beneficial impact

Stormwater Management: Minor, short-term, adverse impact during construction; minor to moderate, long-term, beneficial impact during operation

Hazardous Waste: Minor, long-term, beneficial impact

Air Quality: Minor, short-term, adverse impacts; no long-term impact during operation

Noise: Moderate, short-term, adverse impacts; no long-term impact during operation

**Impacts from Chiller, Cooling Tower, and IT Relocation:**

Historic Resources: Minor, long-term, adverse impact

Views and Vistas: Minor, long-term, adverse impact

Vegetation: Negligible, long-term, beneficial impact

Parking: Minor to moderate, short-term, adverse impacts during construction; minor, long-term, adverse impacts due to operations of cooling tower; no impact from IT or chiller relocation

Utilities: Negligible, long-term, beneficial impact; no short-term impacts

Energy and Environmental Performance: Moderate, long-term, beneficial impact

Stormwater Management: Minor to moderate, long-term, beneficial impact

Hazardous Waste: Minor, long-term, beneficial impact

Air Quality: Minor, short-term, adverse impact due to construction; minor, long-term, adverse impact due to operation

Noise: Minor, short-term, adverse impacts during construction; minor, long-term, adverse impacts due to operation

**SECTION 106 of the NATIONAL HISTORIC PRESERVATION ACT**

The proposed project site is located within the boundaries of the AFRH-W Historic District. The proposed project site is also adjacent to the U.S. Soldiers' and Airmen's Home National Historic Landmark and the President Lincoln and Soldiers' Home

National Monument. Pursuant to Section 106 of the National Historic Preservation Act of 1966 as amended (16 U.S.C. Section 470(f)), federal agencies are required to consider the effects of any undertakings on districts, sites, buildings, structures, or objects included, or eligible for inclusion, in the National Register of Historic Places. Federal agencies are also required to afford the Advisory Council on Historic Preservation (ACHP) a “reasonable opportunity to comment with regard to such undertaking.”

AFRH is conducting a Section 106 review in accordance with the process detailed in Appendix G and Appendix H of the Programmatic Agreement (PA) for the Master Plan, the on-going maintenance and rehabilitation of historic and cultural resources, and the development activities at AFRH-W. The PA was executed on February 25, 2008 by AFRH, the National Park Service (NPS), the National Capital Planning Commission (NCPC), ACHP, and the District of Columbia State Historic Preservation Office (DCSHPO). The process is consistent with Standard Operating Procedure #1 (SOP #1) of the AFRH-W Historic Preservation Plan (2007). In accordance with this process, AFRH initiated informal Consultation with DCSHPO in October 2009 and initiated formal Consultation with DCSHPO through the submission of an Undertaking Review Request to DCSHPO on March 5, 2010. AFRH formally notified ACHP and NPS of the Undertaking on March 8, 2010, and NPS declined to participate in further Consultation. AFRH is coordinating Section 106 Consultation with required reviews by the Commission of Fine Arts and NCPC as outlined in Appendix G for projects involving federal buildings or federal use. Consultation will continue with DCSHPO to resolve potential adverse effects of the design of the new building and will be finalized prior to submission of a Final Review package to NCPC. To finalize Section 106 Consultation, DCSHPO will sign the URR in concurrence of minimization actions implemented in a revised design for the new building and any mitigation actions agreed upon by AFRH and DCSHPO. Any required mitigation will be specified in an attachment to the signed URR.