

August 25, 2014

Mr. Anthony Hood, Chairman Zoning Commission of the District of Columbia 441 4th Street, NW, Suite 200-S Washington, DC 20001

Re: Zoning Case 13-14

Vision McMillan Partners, LLC & DC Deputy Mayor for Planning and Economic

Development

Dear Chairman Hood:

Thank you for providing the National Capital Planning Commission (NCPC) staff an opportunity to provide additional comments on the proposed development at the former McMillan Sand Filtration site. Please note that the following comments are provided by NCPC staff. The National Capital Planning Commission has not taken a formal action on these comments. Pursuant to the National Capital Planning Act, NCPC will take an action on the proposed development following a formal referral by the Zoning Commission. In addition, attached as part of this report are comments on the proposed McMillan development submitted to NCPC staff by the Armed Forces Retirement Home - Washington (AFRH-W).

As expressed in our May 27, 2014 letter, NCPC staff has concerns regarding the height of the proposed development, specifically as it relates to impacts on views from the AFRH-W located directly north of the McMillan property (Attachment A). Since submitting our letter, NCPC staff conducted a site visit to the AFRH-W to photograph and assess existing views, completed visual modeling of the potential impacts of the proposed development, and solicited input from AFRH-W staff. It is our understanding that in response to comments from the Zoning Commission the height of the 130-foot building located within Parcel 1 of the proposed development has been reduced to 115-feet. NCPC's modeling reflects this change.

As discussed in detail below, upon completion of a modeling study NCPC staff has determined that the current development proposal will have substantial impacts on publically accessible views from the AFRH-W Campus, particularly towards the U.S. Capitol Building. The protection of these views was identified as an important planning consideration by both the Federal and District Governments during the development of the 2008 AFRH-W Master Plan. The Master Plan protects these views through a set of planning guidelines that were jointly development by NCPC, The District of Columbia Office of Planning (DCOP), and the District of Columbia Historic Preservation Office (HPO). Furthermore, it appears the impacts to AFRH-W views are a result of the proposed C-3-C and CR zoning, which may be inconsistent with the 2007 Comprehensive Plan Future Land Use Map as well as policies specific to the McMillan site.

## NCPC Viewshed Modeling

After evaluating the visual modeling study, NCPC staff has determined that the McMillan development, as currently proposed, would have a substantial impact on publically accessible views from the AFRH-W toward the U.S. Capitol. The modeling study analyzed the impacts of the proposal from two viewpoints on the Campus: 1) near the Soldier and Airmen's Home National Historic Landmark in an area known as "The Meadow"; and 2) at the Scott Statue, a protected viewshed within the AFRH-W Master Plan. Documentation regarding the history and significance of both viewsheds, and the steps taken by the Federal and District Government to protect these views during the AFRH-W Master Plan process, is included in the comments provided to NCPC by the AFRH-W (Attachment E).

The existing view from "The Meadow" currently is focused on the U.S. Capitol, framed by two stands of mature vegetation (Attachment B). From this vantage point, the U.S. Capitol Building can be seen against the horizontal backdrop of the topographic bowl that surrounds Washington. As demonstrated in the modeling, the permitted building heights within the AFRH-W Master Plan retain this view, while the proposed McMillan development would completely block the view even at the modified height of 115 feet. In fact, the modeling shows that this view would still be significantly diminished even if building heights were reduced to 100 feet.

The panoramic view from Scott Statue, while diminished during the summer months due to overgrown vegetation, is completely intact and observable during the winter months (Attachment C). In addition, as discussed in the comments provided by AFRH-W, restoration of the Scott Statue viewshed is a priority project that is included in the AFRH-W Master Landscape Plan and the 2012 AFRH-W Capital Improvement Plan (Attachment E).

As shown in the modeling study, due to the careful attention paid to building heights by the Federal and District Governments during the AFRH-W Master Plan process, future development along the south boundary of the Campus will retain the character of this view. At maximum heights ranging between 65 - 75 feet within the viewshed, development along the south boundary of the Campus will maintain the full view of the U.S. Capitol dome atop its building base against the horizontal backdrop. In contrast, if constructed as currently proposed, the McMillan development would significantly alter the view from Scott Statue by blocking the view of the U.S. Capitol dome and disrupting the character defining horizontal backdrop established by the topographic bowl (Attachment D). As the modeling shows, these impacts would occur even if building heights were reduced to 100 feet.

## Armed Forces Retirement Home Master Plan (2008) and Memorandum of Agreement

Through the process of developing the AFRH-W Master Plan, a group of Federal and District stakeholders identified and considered planning issues that affect both AFRH-W and the city as a whole. The protection and enhancement of views originating at AFRH-W and extending across other parts of the city was a shared planning interest during the collaborative, multi-year effort to develop the AFRH-W Master Plan and accompanying Section 106 consultation process. During this process, NCPC, DCOP, and HPO, among others, worked closely to develop building height limitations for future development along the south boundary of the AFRH-W Campus in order to preserve the views toward the U.S. Capitol. Following development and adoption of the Master Plan, a Memorandum of Agreement (MOA)

was established between NCPC, DCOP, and AFRH-W which addresses, among other things, the manner in which NCPC and DCOP will use the Master Plan in reviewing future development on the Campus. Of particular note, the MOA states that DCOP will treat the Master Plan like a small area plan, and use it as supplemental guidance to the District of Columbia Elements of the Comprehensive Plan when making zoning recommendations to the Zoning Commission for development at the AFRH-W.

Given the extensive attention that was given by Federal and District agencies to viewshed protection during development of the AFRH-W Master Plan, and the commitment by DCOP to use the Master Plan to develop recommendations to the Zoning Commission for future development at AFRH-W, one would reasonably expect that the impacts of other developments within the AFRH-W viewshed would receive an equal degree of consideration. In fact, the protection of AFRH-W views was considered during the 2010 update to the neighboring Veterans Administration Hospital Center (VAHC) Master Plan. This process involved extensive consultation between the Veterans Administration, NCPC, HPO, DCOP, and DDOT on a range of planning issues, and resulted in the adoption of building heights along the south side of Irving Street that reflect the heights included in the AFRH-W Master Plan.

Considering the interest of the Federal and District Governments in the protection of views during the AFRH-W and VAHC master plan processes, it would seem appropriate that the same interest be given to the impacts of the proposed McMillan development on views from AFRH-W. This fair and equitable application of city-wide planning interests identified during the AFRH-W Master Plan process is the only way to ensure that these important, publically accessible views are protected. It also supports the language of the MOA that addresses treatment of the AFRH-W Master Plan as a small area plan, and its use as supplemental guidance to the District of Columbia Elements of the Comprehensive Plan

### Comprehensive Plan for the National Capital

NCPC staff considers the impacts of the McMillan project on views from the AFRH-W to be the result of the high-density zoning classifications being proposed for the site. This appears to be inconsistent with the 2007 Comprehensive Plan Future Land Use Map as well as policies specific to the McMillan site.

The adopted 2007 Comprehensive Plan Future Land Use Map classifies the McMillan site as Mixed Use, consisting of three land use categories: Medium-density Residential; Moderate Density Commercial; and Parks, Recreation, and Open Space. These land use categories are specifically referenced within policies of the Mid-City Area Element of the Comprehensive Plan that are specific to the McMillan Site. The map describes the Medium-density Residential land use category as predominately consisting of mid-rise apartment buildings ranging between four to seven stories. Under current Zoning Regulations, medium density residential typically includes R-5-B and R-5-C zone districts, which allow building heights up to 60 feet.

<sup>&</sup>lt;sup>1</sup> Mid-City Element, Policy MC-2.6.5: Scale and Mix of New Uses - Recognize that development on portions of the McMillan Sand Filtration site may be necessary to stabilize the site and provide the desired open space and amenities. Where development takes place, it should consist of moderate- to medium-density housing, retail, and other compatible uses. Any development on the site should maintain viewsheds and vistas and be situated in a way that minimizes impacts on historic resources and adjacent development.

The Future Land Use map describes the Moderate-density Commercial land use category as predominately retail, office, and service uses with buildings generally not exceeding five stories in height. The zone districts typically considered to be moderate-density commercial include C-2-A, C-2-B, and C-3-A, which allow building heights up to 65 feet. However, the C-3-C zoning requested as part of the McMillan development is typically considered to be a high-density commercial zone that permits building heights up to 90 feet as a matter-of-right, and 130 feet under a Planned Unit Development. The requested CR zoning is similar to the C-3-C zone in terms of building height and allowable density.

## Conclusion / Recommendation

The modeling study conducted by NCPC staff demonstrates that the current McMillan development does not maintain viewsheds and vistas. In fact, the proposal has the potential to substantially impact publically accessible views that are part of a larger set of planning considerations that were jointly development by the Federal and District Governments during preparation of the AFRH-W Master Plan. In addition, the high-density development proposed for the site appears to be inconsistent with Comprehensive Plan policies specific to the McMillan site, and the land use designations shown on the Future Land Use map.

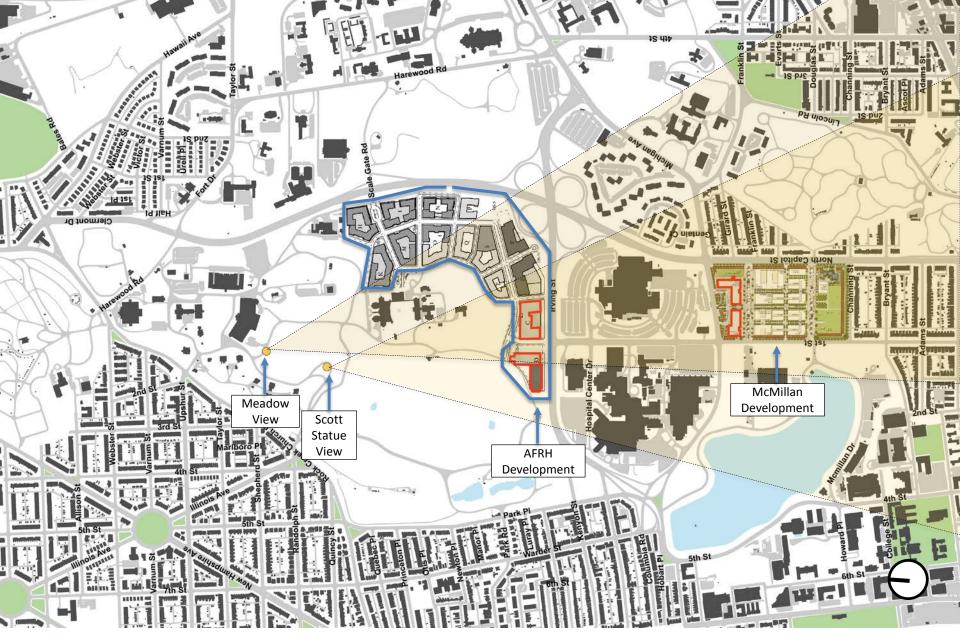
Therefore, NCPC staff recommends that the Zoning Commission request the applicant to submit a development scheme that considers views from the AFRH-W to the same extent taken by the Federal and District Government during development of the neighboring AFRH-W and VAHC master plans, and is more consistent with the Comprehensive Plan land use categories currently assigned to the site.

Sincerely,

Marcel C. Acosta Executive Director

National Capital Planning Commission





Viewing locations



Modeled buildings visible in simulations

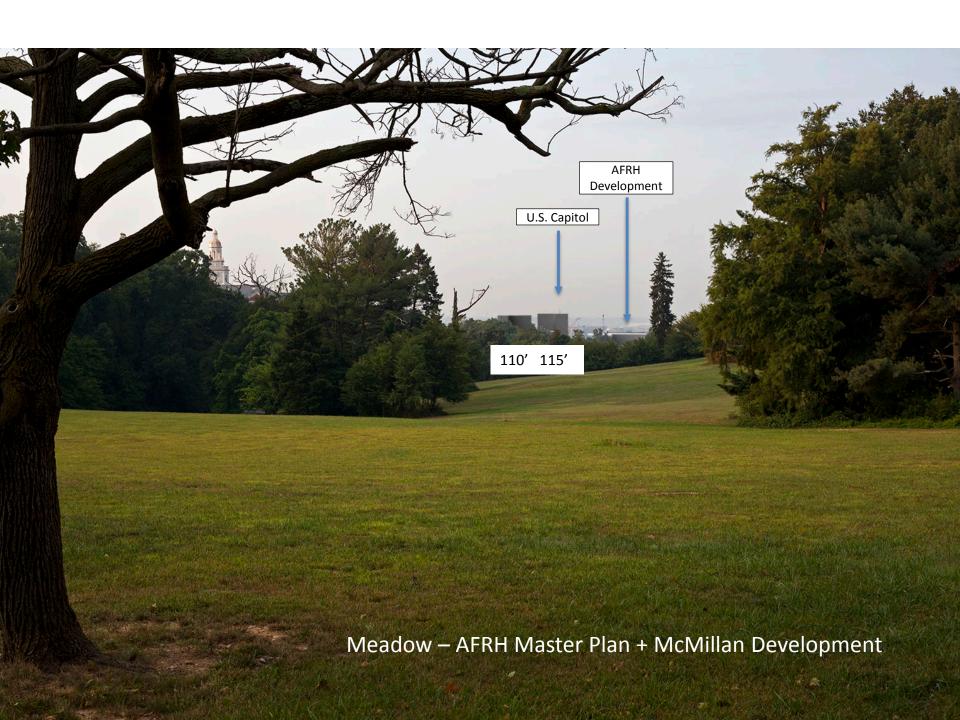
## Attachment B

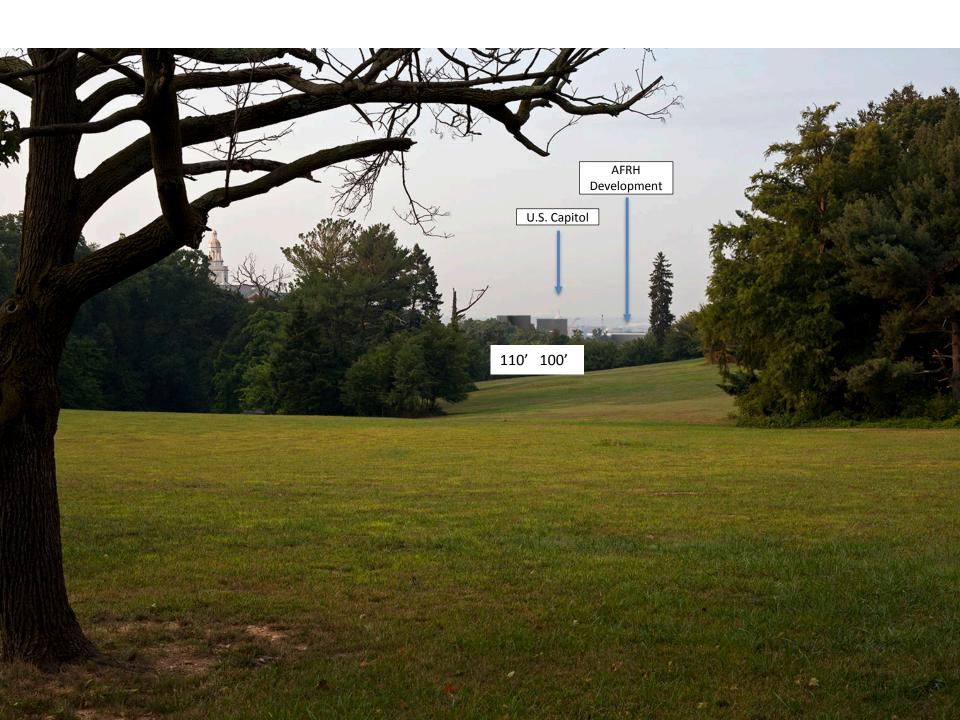
The modeling study conducted by NCPC staff utilized photographs taken during a site visit to the AFRH-W Campus on August 6, 2014. The photographs were taken using a Canon EOS Digital SLR camera with a lens focal length of 50 mm. Modeling was prepared using Geographic Information System (GIS) and Computer Aided Design (CAD) software. GIS data used in modeling study was acquired from the District of Columbia GIS website. The site plan used to model the future development at the AFRH-W Campus was taken from the 2008 final adopted master plan. The site plan used to model the proposed development at the former McMillan Sand Filtration site was acquired from the District of Columbia Office of Zoning website.



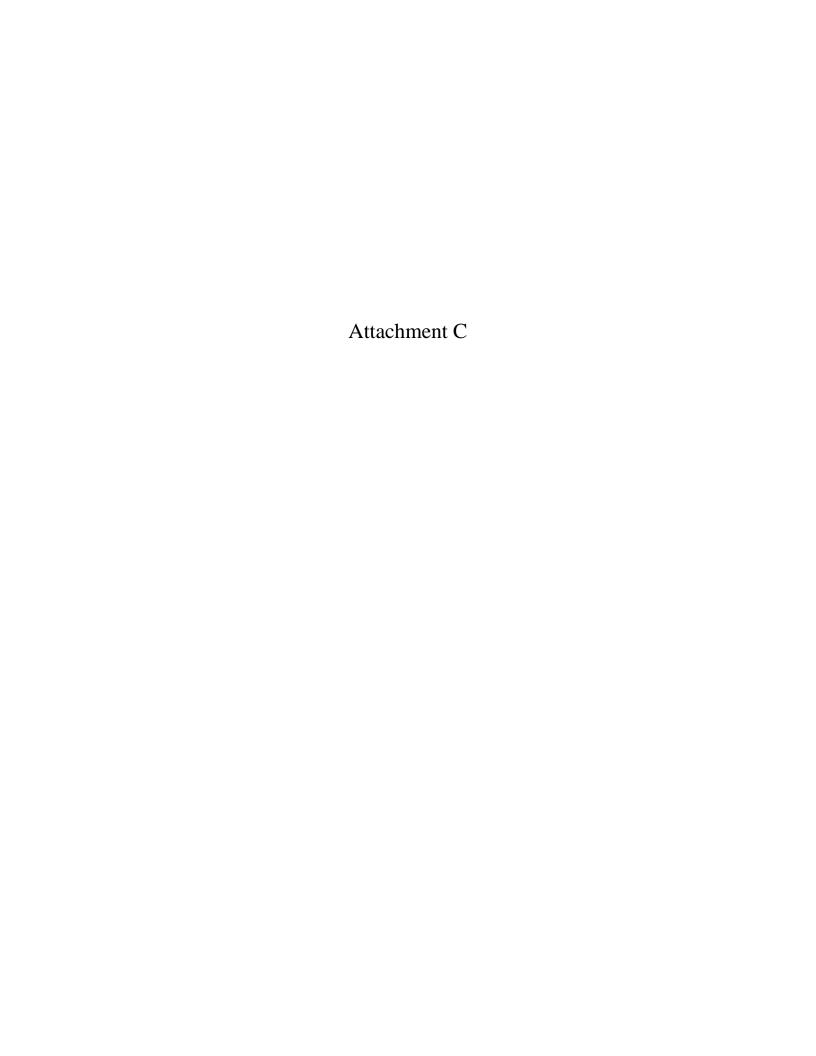














## Attachment D

The modeling study conducted by NCPC staff utilized photographs taken during a site visit to the AFRH-W Campus on August 6, 2014. The photographs were taken using a Canon EOS Digital SLR camera with a lens focal length of 50 mm. Modeling was prepared using Geographic Information System (GIS) and Computer Aided Design (CAD) software. GIS data used in modeling study was acquired from the District of Columbia GIS website. The site plan used to model the future development at the AFRH-W Campus was taken from the 2008 final adopted master plan. The site plan used to model the proposed development at the former McMillan Sand Filtration site was acquired from the District of Columbia Office of Zoning website.



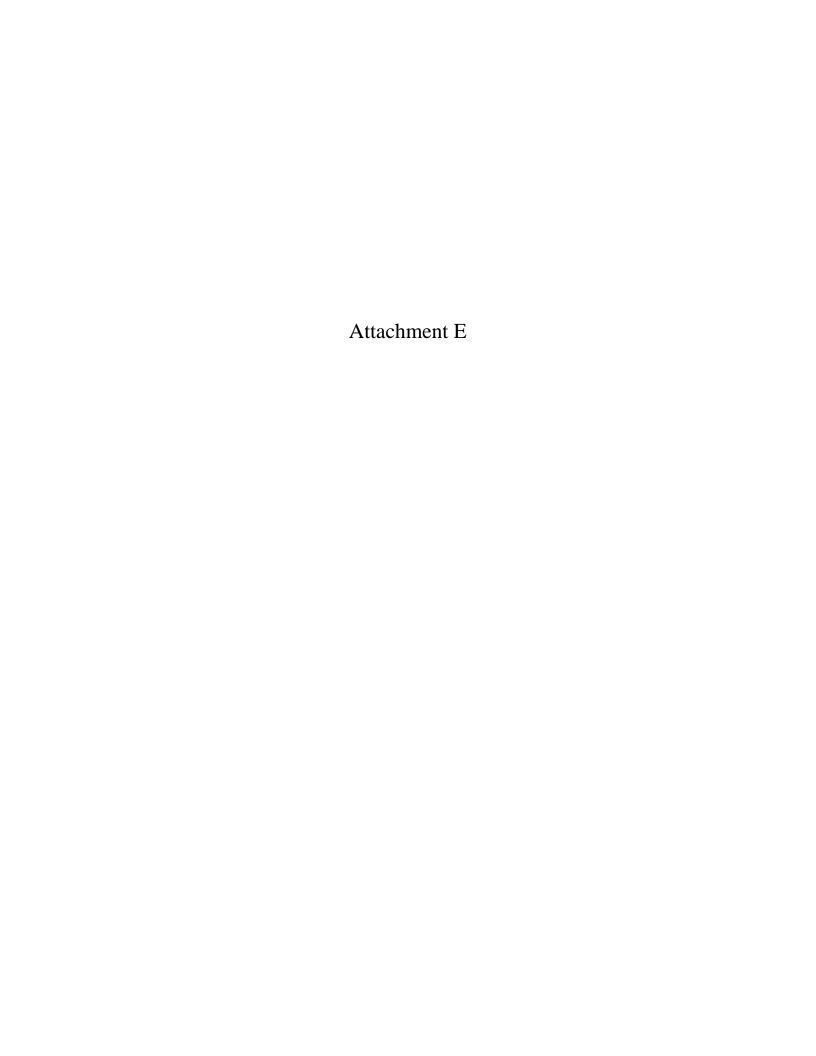














# Armed Forces Retirement Home Office of the Chief Operating Officer 3700 N. Capitol Street, Box 550 Washington, DC 20011-8400

August 21, 2014

Mr. Marcel Acosta Executive Director of the National Capital Planning Commission 401 9th Street NW, North Lobby, Suite 500 Washington, DC 20004

Dear Mr. Acosta:

The Armed Forces Retirement Home (AFRH) submits this letter to the National Capital Planning Commission (NCPC) in response to NCPC's request for comment regarding impact to the agency's Washington, DC, campus (AFRH-W) from the proposed redevelopment project at the McMillan Sand Filtration Site (McMillan). AFRH asks that this letter be taken into formal consideration as part of NCPC's role in protecting federal interests in the National Capital Region (NCR). Specifically, AFRH requests that its comments be considered within the following procedural and regulatory context:

- **AFRH-W Master Plan** ("Master Plan"): AFRH-W has a NCPC-approved Master Plan for its 272-acre campus. The Master Plan incorporates the protection of viewsheds from AFRH-W in its design guidelines and as a specific strategy for Sustainable Design.
- **AFRH-W Programmatic Agreement** ("PA"): AFRH-W has a PA from 2008, on which both NCPC and the DC State Historic Preservation Office (DCSHPO) are Signatories. The PA includes guidance and mitigation for the protection of views, as defined in the Master Plan.
- Memorandum of Understanding ("MOU"): AFRH-W has an MOU with NCPC and the DC Office of Planning (OP), executed in 2007. The MOU states that the AFRH-W Master Plan will be treated as a small area plan and considered as supplemental guidance for the Comprehensive Plan for the National Capital ("Comprehensive Plan").
- National Capital Planning Act: Through the National Capital Planning Act, NCPC and the DC Government jointly develop the Comprehensive Plan. NCPC reviews and advises on District projects, including amendments to city zoning regulations and maps, to ensure consistency with the Comprehensive Plan. Pursuant to § 492 of the District Charter, zoning shall not be inconsistent with the Comprehensive Plan.
- National Historic Preservation Act (NHPA): Pursuant to NHPA, NCPC serves as a steward of historic resources within the NCR, including the AFRH-W Historic District (listed in both the National Register of Historic Places and the DC Inventory of Historic Sites) and the U.S. Soldiers' and Airmen's Home National Historic Landmark. AFRH is

also responsible for the protection of its own historic resources and has developed a Historic Preservation Plan (HPP), which includes the identification, evaluation, and treatment of historic views and viewsheds.

• National Environmental Policy Act (NEPA): Pursuant to NEPA, NCPC undertakes an environmental review to inform its analysis of project proposals, including an analysis of impacts to historic resources such as viewsheds.

### **COMMENTS:**

Within the context of the AFRH-W Master Plan and AFRH's interests as a federal agency, AFRH provides the following comments to NCPC for its consideration during review of proposed zoning for the redevelopment of the McMillan site:

AFRH believes that the current proposal for the redevelopment of the McMillan site will impact both prominent and historically significant views from AFRH-W. Based on view studies conducted during the AFRH-W Master Plan effort and subsequent assessment, AFRH believes that the proposed building heights on the north end of the McMillan redevelopment will substantially obscure views from AFRH-W to the U.S. Capitol Building and other points in downtown Washington, DC. AFRH is specifically concerned about three views from AFRH-W: the view from Scott Statue; the view through AFRH-W's historic Meadow; and the view from the U.S. Soldiers' and Airmen's Home National Historic Landmark ("NHL") (See Figures 7, 8). All of these views have been studied and considered by AFRH, NCPC, and DCSHPO during past planning and design efforts at AFRH-W.

The scope and organization of the AFRH-W Master Plan directly reflects viewshed protection. The consideration of views and their role in the historic spatial organization of the campus was a primary consideration in determining the appropriate locations for new development, both for federal and non-federal purposes. AFRH's decisions regarding the boundaries of the development zones and the overall development potential were based on such considerations, resulting in the shifting and reducing of density.

**Protection of Viewsheds from AFRH-W must extend beyond the campus boundaries.** Although the vantage points of these viewsheds are located within the boundaries of AFRH-W, impacts to these resources are not isolated to AFRH-W undertakings. Therefore, protection of these resources is not solely the responsibility of AFRH. Effective protection must include assessment of impacts of other potential developments and undertakings within the scope of the viewsheds, and such assessment falls under the purview of NCPC and other select District agencies responsible for design and zoning review.

Consistency with the Comprehensive Plan includes consideration and protection of prominent and significant views from AFRH-W. The identification and protection of prominent and historically significant views from AFRH-W to the U.S. Capitol Building and downtown Washington, DC, is a documented consideration of the AFRH-W Master Plan and associated Federal Environmental Impact Statement (FEIS) and PA. Because NCPC and OP consider the AFRH-W Master Plan as supplemental guidance to the Comprehensive Plan, AFRH believes that the protection of these views should be part of any assessment of consistency with the Comprehensive Plan, including the consideration of zoning for the proposed redevelopment of the McMillan site.

Assessment of potential effects on viewsheds from AFRH-W is required by the NHPA. Because NCPC is a steward of historic properties in the NCR, AFRH works closely with NCPC to assess potential effects on federal historic properties and resources at AFRH-W. Based on the proposed building heights on the McMillan site, AFRH believes there will be adverse effects to both the AFRH-W Historic District and the NHL. As a resource within the DC Inventory of Historic Sites, DCSHPO also has interest in this assessment.

AFRH has demonstrated a commitment to protecting its viewsheds. Since approval of the Master Plan in 2008, AFRH has recognized the importance of visual resources on its property and has made deliberate efforts to respect and enhance views within and from AFRH-W. AFRH has worked in good faith with DCSHPO, NCPC, and CFA to protect viewsheds through Section 106 and project review, and has made management and design decisions based on related feedback and recommendations. This includes the reopening of the previously obstructed view from the NHL to downtown Washington DC through the demolition of a Non-Contributing building and the sensitive redesign and siting of its replacement facility based on comments and recommendations from stakeholders.

AFRH has also demonstrated its commitment to <u>manage and use</u> its viewsheds. In 2012, AFRH created the AFRH-W Master Landscape Plan (MLP), which has a stated objective to "enhance the designed historic viewsheds from Scott Statue to the skyline of downtown Washington." This objective recognizes AFRH's desire to manage the viewshed as a key feature of the Home's designed landscape. *Equally as important*, the Home proposes to use its viewsheds as part of ongoing efforts to encourage residents' outdoor activity by "providing destinations within the landscape." The MLP includes the following landscape improvement projects that focus on the protection <u>and</u> use of viewsheds at AFRH-W:

- **Scott Statue Viewshed Restoration**: The purpose of this project is to prune overgrown vegetation to better frame the vista as originally designed and intended. The subsequent inclusion of the Scott Statue Viewshed Restoration Project in the 2012 update to the agency Capital Improvement Plan (CIP) demonstrates AFRH's *prioritization of the project's completion through the agency's capital budget*. (see Figure 11)
- Scott Statue Gathering Area: As part of the AFRH's objective to "enhance the designed historic viewsheds from Scott Statue," this project will provide a picnic and sitting area that increases "incidental interaction among residents, staff, and visitors...that will encourage residents to use a wider area of the campus...and increase outdoor activity." (see Figure 12)
- Campus History Trail Project: This trail is designed to "be accessible to all residents, visitors, and staff" and to take pedestrians around Scott Circle to experience the viewshed to the U.S. Capitol Building and downtown Washington, DC. The project includes interpretive signage at key points, such as the Scott Statue, to "educate residents, staff, and visitors about the history of the Home and the development of the Washington campus." The viewshed from Scott Statue is an important feature of this trail. (see Figure 13)
- Meadow Landscape Restoration: This project is intended to capture "the expansive views from the campus core, through the picturesque grounds, and to the city beyond." This project was created in response to the reopened viewshed from the NHL to downtown Washington, DC after the demolition of the eight-story Scott Building in 2012. (see Figures 9 and 10)

**AFRH considers views as an asset to its residents and their families.** The enjoyment of a unique setting within the nation's capital is an important and appreciated aspect of life at AFRH-W, which is a home to almost 500 veteran residents. The expansive views to Washington's skyline from AFRH-W are part of the historic and present experience of those who call AFRH-W home. The new Scott Building was designed and oriented to capture and frame these views for residents who dine, gather, and live there. Residents also enjoy walks to enjoy the views throughout the expansive campus.

The southward views from AFRH-W are also an important part of the public experience of the campus. Historically, the Home was open as a public park, and its expansive views were celebrated in countless articles and picture books that told of the unique experience of visiting the Soldiers' Home. Washingtonians took long drives and strolls through the winding roads of the Home, stopping at select locations such as the Scott Statue to take in the view of the nation's capital and its monuments. Although the Home was closed to the public in the 1950s, AFRH has recently demonstrated its commitment to reestablishing the Home as an asset to the surrounding communities and finding opportunities to reopen the campus for public enjoyment. For example, over the last three years, the Home has opened its campus to the public for Octoberfest, viewings of the 4<sup>th</sup> of July fireworks, and other large open community events that are advertised to the public. AFRH is also working as partners with the Friends of the Soldiers' Home (FOSH), an organization that received its non-profit 501(c)(3) status in 2014, to establish programming that will activate the west part of the campus and potentially open this area for community use. The agency's commitment to this issue is established in the AFRH-W MLP's "Community Access Project Unit," a grouping of potential landscape improvement projects "intended to accommodate public access and community activities" (see Figure 14). Currently, AFRH-W is open to those members of the public who wish to visit the Lincoln Cottage, a historic site at AFRH-W managed by the National Trust for Historic Preservation.

There is precedent for consideration of views from AFRH-W in the review of other projects outside the boundaries of the campus. The 2011 review of the parking garage for the Veterans Administration (VA) hospital on Irving Street included an assessment of potential effects on views from AFRH-W by DCSHPO and NCPC. Although the proposed phase of work was determined not to have an adverse effect on views, the VA is required to submit future phases for the parking garage to NCPC for review to address DCSHPO's concerns regarding minimizing the effect of building heights on AFRH-W. Please note that the VA Hospital is located adjacent to the AFRH-W campus, between AFRH-W and the McMillan site.

The attachments to this letter provide summary information that supports AFRH's comments, including:

- Attachment A: Information on the significance of views at AFRH-W;
- Attachment B: Information about the protection of views and the consideration of view protection within the AFRH-W Master Plan;
- **Attachment C:** Information on the views AFRH believes will be impacted by the redevelopment of the McMillan site;
- Attachment D: Detailed information about the documentation that supports

# AFRH's concerns regarding the protection of its viewsheds; and

• Attachment E: Figures supporting AFRH's conclusions.

Please do not hesitate to contact AFRH regarding these comments. We are happy to provide any additional information requested regarding the importance of our viewsheds and AFRH's ongoing efforts to protect them as a valuable resource to our federal campus in Washington, DC.

Sincerely,

Steven G. McManus

**Chief Operating Officer** 

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Attachments: As Stated

### ATTACHMENT A: IMPORTANCE OF VIEWS FROM AFRH-W

AFRH-W is a historic federal property and has several designations that protect the property and its individual resources (see Figure 7). The entirety of AFRH-W is designated as a Historic District in the National Register of Historic Places (2007) and the DC Inventory of Historic Sites (2008). Smaller areas of the campus have further designation as the U.S. Soldiers' and Airmen's Home National Historic Landmark (1973) and the President Lincoln's Cottage and Soldiers' Home National Monument (2000).

The National Register of Historic Places nomination for the AFRH-W Historic District (EHT Traceries, 2007) discusses at length the importance of views from AFRH-W to the U.S. Capitol Building and downtown Washington, DC. Subsequent plans, studies, and assessments associated with the AFRH-W Master Plan focus on this aspect of the building's significance and incorporate views into the basis for planning and design.

For example, the FEIS for the AFRH-W Master Plan states:

George W. Riggs chose the location for his house (Lincoln Cottage, Building 12) on the hill that afforded views of the city to the south. AFRH-W itself took advantage of the high points throughout the site, developing the ridges and plateaus for residential uses...large-scale dormitories and hospital buildings made use of the flat plateaus that sit uphill of open fields and afford expansive views to the south...One of the most notable topographic features of AFRH-W is the hill that leads up to the Winfield Scott Statue (Building 60)...the statue's location on top of this slope affords the dramatic views to downtown Washington, D.C...

The steep slopes that define the ridges and plateaus of AFRH-W facilitate many dramatic views from various locations on the property. These views, both architectural and natural, are a central tenant of the property's picturesque landscape. The landscape at AFRH-W, as designed in the 1860s and 1870s, took advantage of several preexisting natural vistas from hilltops and knolls, and the placement of some of the property's original buildings was influenced by the views afforded by their location. Vistas of the United States Capitol are of particular significance to the property, and the intent to protect the view shed was recorded in the Minutes of the Board of Commissioners in the 1870s. Accordingly, the location and orientation of buildings and structures constructed during the late nineteenth and early twentieth centuries ensured the retention of this view shed. Outside the period of significance for AFRH-W, improvements have been less sensitive to the preservation of this resource. The 1954 Scott Building (Building 80) obstructs the view from the Lincoln Cottage (Building 12) and Sherman Building (Building 14),\*
(FEIS, 3-53)

\*Please note that this viewshed has since been partially reopened by the demolition of the Non-Contributing 1954 Scott Building and the sensitive siting and design of its replacement building.

### ATTACHMENT B: AFRH-W MASTER PLAN

In 2008, NCPC approved the AFRH-W Master Plan. The master planning process spanned several years and included a lengthy and comprehensive consultation and assessment process pursuant to AFRH's responsibilities under the NHPA and NEPA. Through this process, AFRH worked with numerous stakeholders—including NCPC, DCSHPO, and OP—to identify and study prominent and significant views on campus. These views were treated as planning considerations in the development of design guidelines (Figure 5), while other views were further designated as historic viewsheds and view corridors in the AFRH-W Historic Preservation Plan (HPP, see Figure 6). The consideration of these views played a major role in determining building locations, heights, and massing in Zone A, the area of campus slated for future redevelopment. AFRH conducted extensive view studies and modeling exercises to ensure that potential development did not block identified views, and **AFRH shifted and reduced proposed density as a result of these studies**, affecting the overall development potential at AFRH-W. Z

Beyond the restrictions placed upon the redevelopment of Zone A, the consideration of views and their role in the historic spatial organization of the campus (building clusters, open spaces, and woodlands) was a primary consideration in determining the appropriate locations for new development, both for federal and non-federal purposes. The boundaries of the development zone were drawn according to these considerations, and the overall Master Plan (AFRH Zone and Zone A) are a reflection of the importance of viewshed protection at AFRH-W.

The importance of the viewshed issue is documented in the Master Plan and all associated consultation materials including meeting minutes, presentations, and assessments. During Section 106 Consultation and NEPA assessment, AFRH received numerous comments regarding the identification and protection of these views from stakeholders including the National Trust for Historic Preservation, the U.S. Commission of Fine Arts, and the DC State Historic Preservation Office ("DCSHPO"). AFRH responded to these comments by conducting studies and assessments and adjusting the Master Plan as appropriate.

The AFRH-W Master Plan was also featured in case studies conducted by the Advisory Council on Historic Preservation ("ACHP"), who participated in the Section 106 consultation process for the Master Plan. ACHP commended AFRH on the treatment of viewsheds in the Master Plan and the extensive efforts to consider them during the planning process.

Since NCPC's approval of the final Master Plan, AFRH continues to consider prominent and significant views when assessing potential effects and impacts of all federal undertakings at AFRH-W. These views will be further considered and protected during the implementation of the Master Plan and the redevelopment of Zone A.

### ATTACHMENT C: VIEWS OF CONCERN

The McMillan redevelopment may impact three areas of external views that were the subject of study and assessment during the development of the AFRH-W Master Plan and in subsequent planning, design, and compliance activities as described below (Figures 7 and 8):

- Views from Scott Statue: Scott Statue, a historic bronze sculpture of AFRH-W's original benefactor, was installed at the Home in 1873. The location of the statue on a high plateau was selected specifically to afford unobstructed views from the statue to the U.S. Capitol Building and downtown Washington, DC. The Master Plan and associated documents assess impacts to this viewshed and resolve potential impacts through design guidelines. Subsequent planning efforts, including the 2012 AFRH-W Master Landscape Plan and 2012 update to the AFRH Capital Improvement Plan, document AFRH's programmatic and financial commitment to protection and restoration of this viewshed as a significant historic resource. (see Figures 2, 3, 5, 6, 7, 8)
- Views through Savannah I: Savannah I is a significant Character Area defined within the AFRH-W Historic Preservation Plan. The Meadow within Savannah I has been maintained as an open landscape since the establishment of the institution in 1851, affording expansive views from the historic core of the campus to the U.S. Capitol Building and the rest of downtown Washington, DC. The significance of many of the landscape resources in and around Savannah I is based on the role of the resource in affording and enhancing southward views to Washington. The Master Plan and associated studies assess impacts to the southward viewshed through Savannah I and resolve potential impacts through design guidelines. (see Figures 4, 5, 7, 8)
- Views from Lincoln Cottage and the U.S. Soldiers' and Airmen's Home National Historic Landmark (NHL): In addition to the views shown in the Master Plan, AFRH considers and protects views from points throughout the NHL (Sherman Building, Lincoln Cottage, Quarters 1, and Quarters 2). The NHL is comprised of the Home's first buildings, which were carefully sited so as to take advantage of the southward view afforded by property's elevation and sloping topography. Beyond protection of the NHL itself, the southward viewshed from the NHL and the Home's historic core is a key component of the design intent and stated historic significance of the AFRH-W Historic District and many of its individual Contributing built and landscape resources. The construction of the 1950s Scott Building diminished this important aspect of the Home's historic context by obscuring much of the southward viewshed from the historic core. As such, the 2007 AFRH-W HPP recognizes the importance of the view but identifies it as a compromised historic viewshed (see Figure 6).

Since 2007, however, AFRH's decision to replace the Non-Contributing Scott Building afforded the opportunity to reopen this significant viewshed. Reopening the viewshed was a major consideration during the design review and consultation process for the new Scott Building between 2009 and 2010 and was strongly encouraged by NCPC, DCSHPO, and the Commission of Fine Arts (CFA). These parties participated in extensive consultation and gave formal comment and recommendations regarding the siting and design of the new building with respect to views from the NHL. In general, AFRH is required to consider views from the NHL for all undertakings at AFRH-W, as documented in numerous design review submissions to NCPC, DCSHPO, and CFA. (see Figures 1, 6, 7, 8)

### ATTACHMENT D: SUPPORTING DOCUMENTATION

The identification and protection of the views referenced above is found in the following AFRH planning documents and studies:

- AFRH-W Master Plan (2008): The AFRH-W Master Plan includes the consideration of views into the design guidelines for AFRH-W and makes specific reference to restrictions on new development for the purpose of protecting these views (see Figure 5). Some of the references to the protection of views in the Master Plan include:
  - o "The preservation of key views is outlined within the zone specific guidelines...Historically, topographical features were used to create, define, or obscure key views to, from, and between built resources of the Home. The Master Plan for new development shall respect the site's topography, take advantage of views, preserve existing view corridors to the extent possible, and help frame internal views of the existing landscape. As part of the Master Planning process, potential development in each zone was studied from numerous vantage points inside and outside the Home in an effort to retain historic topography, significant topographic features, and key associated views. New development shall avoid causing adverse visual impacts whenever possible." (Master Plan, p. 34) (see Figure 5 for map of key views that were considered in the design guidelines for the Master Plan.)
  - "Prominent vantage points such as Scott Statue have been taken into account when developing the Master Plan so that new construction will be designed in such a way as to allow existing significant views to remain intact." (Master Plan, p. 89)
  - o "Building heights are set at some parcels at 65 or 75 feet based on viewsheds, view corridors, and/or adjacency to the pasture." (Master Plan, p. 100)
  - "Views from outside and within Zone A have been considered in developing the Master Plan, to assure the preservation of all historic views and as many existing views as possible. The view from Scott Statue is a particularly significant and an historic vantage point. Guidelines for heights of buildings within Zone A have been designed to preserve historic views and viewsheds from the Scott Statue." (Master Plan, p. 109)
  - o "The maintenance and enhancement of viewsheds preserves qualitative attributes of AFRH-W and promotes local interest in the site." (Master Plan, p. 118)
- AFRH-W Final Environmental Impact Statement (FEIS, 2007): As part of its NEPA compliance, AFRH included an assessment of impacts on views in its FEIS for the Master Plan in 2007. The FEIS states: "The preferred alternative was designed to minimize these impacts through the Master Plan preferred for this site and its design guidelines which control critical elements such as height, massing, view protection, landscape and historic structures." (FEIS, 4-44). The FEIS goes on to specifically discuss the measures to protect views through Savannah I and the view from Scott Statue:
  - Savannah I: "This character area would be most affected by new construction in the AFRH Zone and Zone A, which could create significant visual intrusions upon this historic landscape feature. The Master Plan and its guidelines for the preferred alternative set height limits and parcels in such a way to avoid or minimize impacts on the views from this Character Area." (FEIS, 4-43)
  - Scott Statue: "Dense construction to the south of this resource could adversely impact the view of the dome of the U.S. Capitol to the south. The planning process involved numerous studies, including sketches and elevations, on-site balloon tests, and use of a crane to check the visibility of potential building heights on views from the Scott Statue. As a result, the Master Plan height and parcel guidelines avoid or minimize view impacts, and the mitigation will further minimize those potential impacts." (FEIS, 4-44)

 AFRH-W Programmatic Agreement (PA, 2008): The AFRH-W PA stipulates specific mitigation related to the protection of viewsheds. The Signatories on the PA included NCPC, DCSHPO, ACHP, the National Park Service, and AFRH. According to the PA, both AFRH and the selected developer for Zone A will:

"comply with height limits and screening guidance in the Master Plan to protect viewsheds as identified in the HPP and Master Plan, as approved by NCPC." (PA, Appendix D)

• **AFRH-W Historic Preservation Plan** (HPP, 2007): The HPP identifies views as a Contributing Resource to the "Spatial Patterns" Character Area of the AFRH-W Historic District (see Figure 2). The HPP includes extensive information regarding the significance of views to the history and historic character of AFRH-W, along with documented evidence of the history of viewshed protection at AFRH-W, which dates back to at least the 1870s.

The HPP also has many indirect references to the importance of views at AFRH-W. The descriptions of many individual contributing landscape resources at AFRH-W relate the significance of the relationships between the Home's designed landscape and views. For example, the description of the Contributing Evergreen Tree Clusters in Savannah I states:

First appearing in maps in 1873, these groupings of evergreens serve as focal points within the expansive grassland, even in winter. Historically, they served as intermediate points of reference for vistas from the Lincoln Cottage (Building 12), looking through the meadow to the U.S. Capitol.

Another example in the description of the Contributing Meadow:

The large open space would have afforded views from Riggs' house (Lincoln Cottage, Building 12) all the way to the US Capitol and the rest of Downtown Washington, D.C. Today, that view is blocked by the Scott Building (Building 80), but the meadow continues to play an important role as open space within the site.

- AFRH-W Master Landscape Plan (MLP, 2012): The AFRH-W MLP is a project-based Landscape improvement plan that supplements the AFRH-W Master Plan. The purpose of the MLP is to provide scopes and guidance for landscape improvement projects that promote a therapeutic environment for residents and create new opportunities for activity and fellowship in the Home's picturesque setting. The MLP includes objectives and specific project scopes for the management, enhancement, and use of the Home's significant and prominent views and viewsheds. The MLP also demonstrates AFRH's proposed use of its views to create "destinations within the landscape" through which they can promote outdoor activities for residents such as walking and biking. (see Figures 9, 10, 11, 12, 13). The MLP also demonstrates AFRH's commitment to working in partnership with the community to make areas of the campus accessible to the public. Community use of AFRH-W and public access makes the protection and enhancement of views an important objective for AFRH in order to enhance the visitor experience and reestablish AFRH-W as an asset to the community.
- AFRH-W Capital Improvement Plan (CIP, 2012 Update): The 2012 update to the AFRH CIP includes the Scott Statue Viewshed Restoration Project from the AFRH-W MLP. Inclusion of this project in the CIP shows AFRH's commitment to prioritizing the restoration project in its capital budget.
- **Section 106 Consultation Record**: The record of Section 106 consultation for the AFRH-W Master Plan (2005-2008) includes meeting minutes, presentations, and studies related specifically to the consideration of viewshed preservation in the AFRH-W Master Plan.
- NCPC Review of the New Scott Building (2010): The NCPC Staff Recommendation for the design review of the New Scott Building at AFRH-W references the improvement of the siting and design in

comparison to the previous Scott Building, which was constructed in the 1950s. NCPC staff specifically cite the improvement to the southward viewshed:

"Staff supports the location and the site plan of the proposed building. The project will re-establish the historic views from the Lincoln Cottage to the Capitol and downtown Washington, which are blocked currently by the existing Scott Building." (Staff Recommendation, NCPC File 7024, p. 8)

• CFA Review of the New Scott Building (2010): CFA's review of the new Scott Building between 2009 and 2010 included extensive discussion regarding the viewshed from the Lincoln Cottage and the NHL. The Commission made specific recommendations regarding viewshed protection that influenced the final design of the new Scott Building. For example, the Secretary's letter to AFRH regarding CFA's comments in March 2010 states:

"In particular, they endorsed the creation of an open space west of the building that would emphasize the panoramic view southward." (Letter from Tom Leubke to Steve McManus, 26 March 2010)

• NCPC and DCSHPO Review of the Veterans Administration Hospital Parking Garage (2011): The VA Hospital is located directly south of AFRH-W, between AFRH-W and the McMillan site. In 2011, the VA proposed phase 1 of a visitors parking garage along Irving Street. NCPC's staff recommendation for the proposed parking garage includes information about the assessment of impacts on views from AFRH-W by both NCPC and DCSHPO. This review shows precedent for the assessment of impacts on views from AFRH-W by undertakings and projects outside the boundaries of AFRH-W but within the viewshed from the campus. Specific comments from the staff recommendation include:

"The DC SHPO has reviewed this master plan modification and has determined that the parking garage would have no adverse effect on the AFRH should include some screen to reduce the glare from vehicles on the top level as seen from the AFRH site...Since this phase of the parking garage is only three levels, it cannot be seen from long distances and therefore will not have a visual impact on the AFRH as a historic resource. As the third phase of the parking garage would likely be visible from longer distances staff would recommend that the Commission require that the VA submit future phases for the parking garage and address the concerns raised by the District of Columbia State Historic Preservation Office regarding minimizing the effect of building height on and views of the top of the parking garage level from the Armed Forces Retirement Home site by including a screen to the top level of the parking garage." (Staff Recommendation, NCPC File No. MP028/7120, February 2011)

### **ATTACHMENT E: SUPPORTING FIGURES**



Figure 1: View of the dome of the U.S. Capitol Building and downtown Washington, DC, from south side of Quarters 2, which is located within the Soldiers' and United States Airmen's Home National Historic Landmark. The U.S. Capitol Building is indicated by the arrow. (2014).



Figure 2: View of the protected viewshed of the dome of the U.S. Capitol Building and downtown Washington, DC, from Scott Statue. The U.S. Capitol Building is indicated by the arrow. View taken from in front of the statue. (2012)

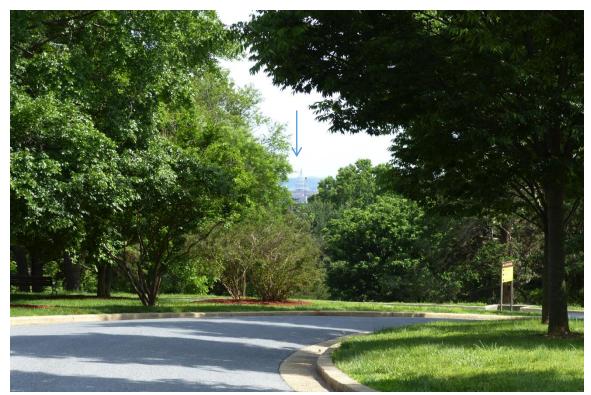


Figure 3: View of the protected viewshed featuring views to the dome of the U.S. Capitol Building and downtown Washington, DC, from Scott Statue. The U.S. Capitol Building is indicated by the arrow. View taken from behind the statue. (2014)



Figure 4: View of the U.S. Capitol Building and downtown Washington, DC, through Savannah I. The U.S. Capitol Building is indicated by the arrow. (2006)

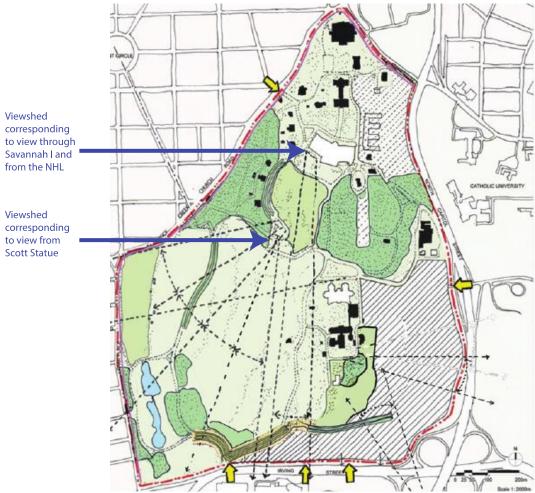


Figure 5: Design Guidelines Diagram, AFRH-W Master Plan, 2008 (p. 23). Diagram shows the consideration of views through Savannah I and from Scott Statue.

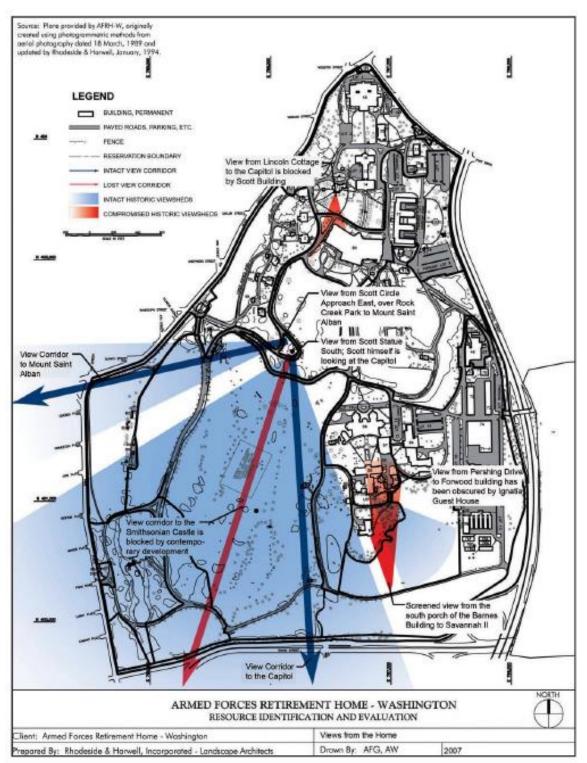


Figure 6: Map of views from the Home, as included in the AFRH-W HPP in 2007. Map shows the protected scope of the historic viewshed from Scott Statue, as well as the then-compromised view from the Lincoln Cottage and the National Historic Landmark. The latter has since been reopened by the demolition of the 1950s Scott Building and the sensitive siting and design of the new Scott Building. (map by Rhodeside and Harwell, 2007)

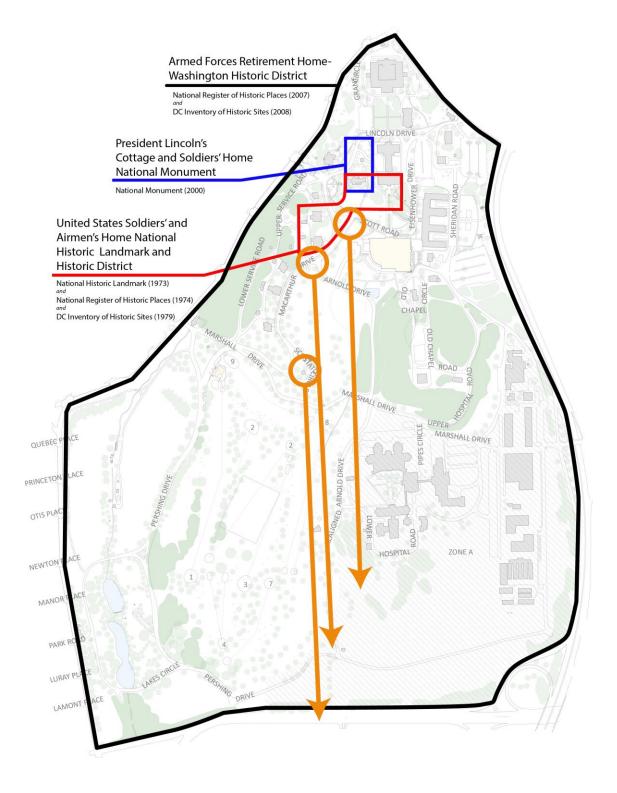


Figure 7: Site Plan showing designations at AFRH-W and the three views of concern.

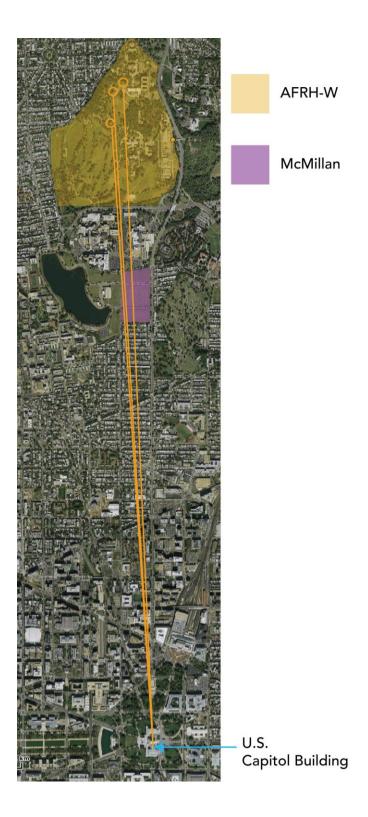


Figure 8: Views of concern for AFRH-W, showing only view axes to the U.S. Capitol Building. Map shows that all three view corridors to the U.S. Capitol Dome run through the north end of the McMillan Site. (base maps from DC PropertyQuest, August 2014)

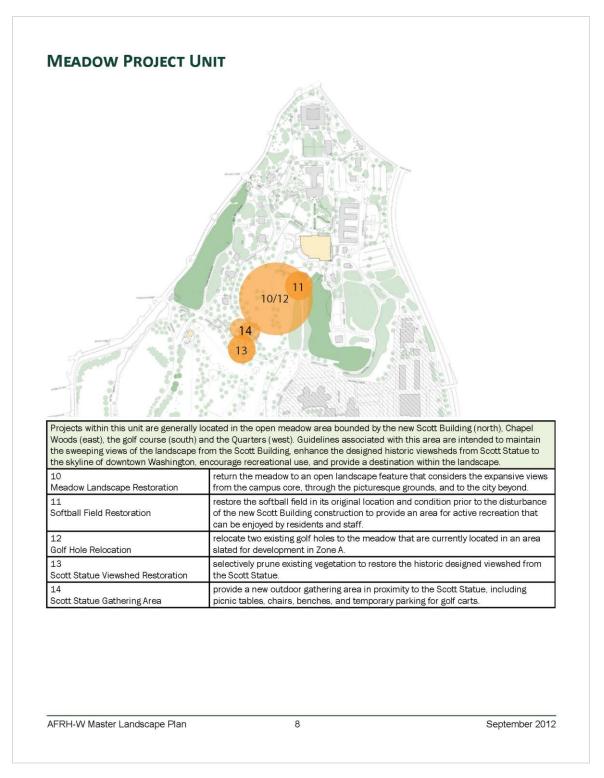


Figure 9: An excerpt from the 2012 AFRH-W Master Landscape Plan showing Meadow Project Unit. This project unit features several projects dedicated to or featuring the Scott Statue viewshed and the southward view from the NHL, through the Meadow, to the city beyond.

# MEADOW PROJECT UNIT

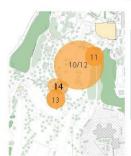
Projects within this unit are generally located in the open meadow area bounded by the campus core to the north, Chapel Woods to the east, the Officers' Quarters to the west, and the golf course to the south. This area functions as a transition between the building clusters of the campus core and the former agricultural land that once occupied southern half of the campus.



View from the meadow

The meadow is characterized by sloping topography and punctuated by shrubs and small trees. In addition to its role as part of the designed landscape of the Home, the meadow is also part of the Home's rich agricultural history and was used for the cultivation of ensilage for the institution's livestock. Historic documentation also indicates that this area of campus may have been the original location for golf course of the U.S. Soldiers' Home Golf and Tennis Club, which was established in 1911. In recent years, the northeast comer of the meadow was occupied by an informal softball field. The vegetation and topography of this landscape have been altered as part of the construction of the new Scott Building.

The statue of General Winfield Scott, the benefactor of the institution, was designed by artist Launt Thompson and installed on the south end of the meadow in 1873. At an elevation of 300 feet, the statue is located along the southern terrace of the plateau on which the Home's original buildings were sited. General Scott looks southward to the skyline of downtown Washington, and historic documentation indicates that this viewshed from Scott Statue was intentional and maintained as a feature of the Home's designed landscape.



### **P**ROJECTS

- 10 Meadow Landscape Restoration
- 11 Softball Field Restoration
- 12 Golf Hole Relocation
- 13 Scott Statue Viewshed Restoration
- 14 Scott Statue Gathering Area

Projects and guidelines associated with this area are intended to maintain the sweeping views of the landscape from the Scott Building, restore the landscape of the meadow, enhance the designed historic viewsheds from Scott Statue, and encourage recreational use.

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AFRH-W Master Landscape Plan

Figure 10: An excerpt from the 2012 AFRH-W Master Landscape Plan showing the Meadow Project Unit. This project unit features several projects dedicated to or featuring viewsheds. The cover photo for the project unit features the southward view from the NHL, through the Meadow, to the city beyond

# 13 - Scott Statue Viewshed Restoration



The statue of General Winfield Scott, considered the Home's most important benefactor, was designed by artist Launt Thompson and installed in this location in 1873. At an elevation of 300 feet, the statue is located along the southern terrace of the plateau on which the Home's original buildings were sited, and General Scott looks southward to the skyline of downtown Washington. Historic documentation indicates that this viewshed from Scott Statue was maintained as a feature of the Home's designed landscape. In recent years, the vegetation within the Scott Statue viewshed has become overgrown, and action is required to restore the viewshed, particularly to the U.S. Capitol Building and the Washington Monument.

### Scope

AFRH will selectively prune and remove existing vegetation that obscures the viewshed of the Scott Statue.

#### Guidelines

Thinning of the landscape should be focused on the area between Scott Circle and Marshall Drive. Removal of large, mature trees south of Marshall Drive is discouraged. Trees associated with the "Scott Statue Grove" have a Relative Level of Significance of "Significant" and should not be impacted by this project.



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AFRH-W Master Landscape Plan

Figure 11: An excerpt from the 2012 AFRH-W Master Landscape Plan showing the restoration of the Scott Statue Viewshed as a planned landscape improvement project within the Meadow Project Unit.

# 14 - Scott Statue Gathering Area

The Home provides a bucolic setting for relaxing and socializing outdoors. Designating comfortable, accessible areas for outdoor gathering will encourage residents to use a wider area of the campus and will generally increase outdoor activity. Outdoor sitting areas may also increase incidental interaction among residents, staff, and visitors. Updated and improved gathering areas are consistent with the agency's values associated with CARF accreditation, including providing appropriate environmental conditions for the benefit of residents, as well as ensuring architectural and environmental accessibility on campus.



Area around Scott Statue

#### Scope

AFRH will provide new outdoor gathering areas in select locations on the campus, including the site of Scott Statue (Building 60). The gathering area will be fitted with picnic tables and chairs and/or benches. To improve access to the gathering area and to feature Scott Statue as a destination on campus, AFRH will consider closing the adjacent section of MacArthur Drive to vehicular through-traffic and using the existing paving for golf cart parking for the gathering area.

### Guidelines

The gathering area should be located in the open area directly west of MacArthur Drive and south of Quarters 6 and/ or within the "Scott Statue Grove" landscape resource (Relative Level of Significance of Significant). To ensure minimal impact to the landscape, the gathering area should be located close to existing pathways or the new pathway planned as part of the Campus History Trail (Project 32), and all aspects of the project should avoid impacting existing trees and root structures. New furnishings should not clutter open space. The gathering area should employ the shade of

the existing trees, and new plantings are discouraged so as to preserve the character of the landscape. All designs and specifications for the gathering area should be consistent with the treatment recommendations provided for Significant landscape resources in the HPP (see Appendix H).

To ensure that Scott Statue Gathering Area is a comfortable, accessible, and safe destination, the gathering area should include five (5) golf cart charging stations, a water station, and a handicapped-accessible path from the existing MacArthur Drive sidewalk (see Campus History Trail, Project 32). Any road crossings required to get to the gathering area should be clearly marked. The site should comply with site-wide furnishing guidelines and be consistent with ADA guidelines for Outdoor Accessibility in Appendix C, specifically those for Outdoor Constructed Features, Outdoor Recreation Access Routes, and Concrete, Asphalt or Board Surfaces. Any golf cart parking should be limited to use of the gathering area and not used for long-term parking. Signs for the parking area should follow the site-wide design guidelines for signage.



AFRH-W Master Landscape Plan

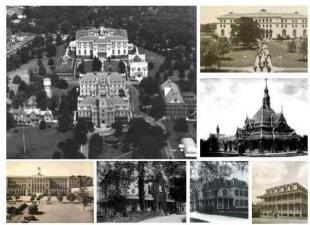
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Figure 12: An excerpt from the 2012 AFRH-W Master Landscape Plan showing the Scott Statue Gathering Area as a proposed landscape improvement project.

# 32 - CAMPUS HISTORY TRAIL

The Home was established in 1851 as the northern branch of a new Congressionally organized U.S. Military Asylum, an institution created to provide care for old and disabled veterans of the regular Army. AFRH-W is the only surviving branch of the three original branches established in the 1850s and has remained a symbol of the nation's commitment to its military veterans for over 150 years. The Home has also played an important role in the country's political and military history. Its Board of Commissioners has included such luminaries as General Winfield Scott, General William T. Sherman, General Philip Sheridan, and U.S. Surgeon General Joseph K. Barnes. In addition, four sitting U.S. presidents, including President Abraham Lincoln, are known to have resided at the Home. The entirety of AFRH-W is designated a historic district in the National Register of



Examples of historic images illustrating campus history at AFRH-W

Historic Places, and sections of the campus have further designation as the United States Soldiers' and Airmen's Home National Historic Landmark and the President Lincoln's and Soldiers' Home National Monument. AFRH is proud of the rich history of the Home, which is embodied in its historic architecture and grounds. The agency would like to encourage residents, staff, and visitors to learn about AFRH-W history while engaging in outdoor activity.

### Scope

AFRH will implement a Campus History Trail to educate residents, staff, and visitors about the history of the Home and the development of the Washington campus. The trail will start at the Sherman Building, wind through the historic core of the campus, follow Quarters row down MacArthur Drive, and continue on a new spur path that starts at the MacArthur Drive sidewalk and winds through the lawn south of Quarters 6. The trail will terminate at Randolph Street Gate. In total, the trail will cover between 0.75 and 1.0 miles. The trail will be marked by interpretive signage about the history of the Home, providing information about the establishment of the institution, campus development, historic events at the Home, and building namesakes.



Potential route for Campus History Trail

AFRH-W Master Landscape Plan

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Figure 13: An excerpt from the 2012 AFRH-W Master Landscape Plan showing the Campus History Trail project. The trail uses the viewshed from the Scott Statue to create a destination in the landscape for residents and visitors and will include interpretive signage to discuss the history and significance of the vista.

# **COMMUNITY ACCESS PROJECT UNIT**

This unit focuses on the southwest corner of the campus where AFRH intends to accommodate limited public access and use of its grounds. These projects will help AFRH toward reaching one of its strategic goals: to expand its circle of influence outside the physical boundaries of the Home and engage external stakeholders.



Community members enjoying the Home's grounds, July 2012

Starting in 1869, the Home began to make landscape improvements throughout the grounds to create a park-like setting for enjoyment by both residents and visitors. Many of these improvements, such as the Lakes, were concentrated in what is now the southwest corner of the campus. For almost a century, the Home allowed public use of this area for activities such as carriage rides, picnics, ice skating, and strolling. Since the campus gates were permanently closed to the public in the 1950s, AFRH residents have continued to use the grounds for recreation; but the conditions of more remote areas of campus have declined as the Home's operations become increasingly concentrated.

AFRH is considering restoring limited public access to realize the potential of the campus as an amenity to the public and to provide opportunities to engage the community in the activities and mission of the Home. AFRH intends to focus community uses to the Lakes and surrounding areas in hopes of activating and improving the conditions of the southwest corner of the campus. Although AFRH intends to rehabilitate the Lakes as part of the AFRH-W Capital Improvement Plan, the agency hopes to partner with community groups to implement other landscape improvements that are



### PROJECTS

- 25 Community Gardens
- 26 Picnic Areas
- 27 Dog Park
- 28 Lakes Gathering Area
- 29 Lakes Fence
- 30 Lakes Rehabilitation
- 31 Bridge Rehabilitation

intended to accommodate public access and community activities. AFRH will use this project unit to ensure that community-implemented improvements are consistent with standards and guidelines that are relevant to the Home and all federal properties.

Projects and guidelines for this project unit will guide AFRH and community partners in making this area of campus more appealing, safe, and secure.

September 2012 57 AFRH-W Master Landscape Plan

Figure 14: An excerpt from the 2012 AFRH-W Master Landscape Plan showing the Community Access Project Unit. This group of landscape improvement projects demonstrates AFRH's commitment to reestablishing parts of the campus as an asset to the community. Public use of AFRH-W further reinforces the importance of maintaining views from AFRH-W as part of the historic and future public experience of the campus.