

**AFRH draft Final Master Plan Comments**

<b>Name</b>	<b>Comment</b>	<b>Proposed Disposition</b>
<p>Charles, Carol, and Rebecca Spring 3808 4th St NW Washington, DC 20011</p>	<p>We urge you to work with the AFRH to scale back their plans, since it will negatively impact the residential areas to the west and north of the property. The AFRH should start with just the retail development along North Capitol. Once that is finished and in use, all affected could evaluate if the results are acceptable. Then the AFRH can propose another stage.</p> <p>Please don't approve this whole project as it is now proposed.</p> <p>Once natural, open space is destroyed, it can never be restored.</p>	<p>The Master Plan addresses the whole site so it can address issues in their totality and provide guidelines in the case that future development is necessary. As the Master Plan now states, development of Zones A, B, and C will be phased.</p> <p>The proposed final Master Plan significantly reduces the proposed development on the site – from nearly 10 million sf to approximately 6.4million sf. AFRH intends to only develop Zone A at this time. Any future development in either Zones B or C would be tied to AFRH financial need. The Master Plan has been modified to reflect AFRH's intension to complete the Zone A development first and to analyze the financial returns of that development prior to making any decision to develop Zones B and/or C.</p>
<p>Petworth and Columbia Heights Residents Concerned</p>	<p>I have reviewed the Final Master Plan for development of the AFRH campus in Washington, DC as part of the Section 106 Historic Preservation review. PCHRC does not see this plan as taking seriously the extensive comments that we or other community organizations have made over the past two and a half years, in particular as regards the preservation of historic open space. We see no point at this time in commenting in detail on the Final Master Plan, as to do so would simply entail repeating extensive comments we have already made. Instead we refer you again to our comments of January 10, 1007, November 2, 1006, January 20, 2006, January 18, 2006 (to the Historic Preservation Review Board), and comments in July 2005 on the draft Environmental Impact Statement.</p>	<p>The draft Master Plan has been extensively modified in response to comments received through the EIS process, the Section 106 process, and through other stakeholder feedback. Over 20+ acres of open space will be made accessible to the public in Zone A alone. In addition, both the Master Plan and the submission letter to NCPC for the Final MP will contain a discussion of AFRH's willingness to entertain offers for the alternative disposition by preferably lease (or sale) of Zone C for the creation of public open space.</p> <p>Over 100 acres of the whole site will remain undeveloped.</p>
<p>National Park Service</p>	<p>We believe there is a need to develop and alternative that specifically addresses the part and open space value and contribution to the City as a whole. In our judgment, the areas identified as B and C should be considered critical</p>	<p>Over 20+ acres of open space will be made accessible to the public in Zone A alone. In addition, both the Master Plan and the NCPC submission letter for the Final MP will contain a discussion of AFRH's willingness to entertain offers for the</p>

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	<p>components of an overall park, open space and landscape component of this retirement home and the city as well. To allow these two areas to be developed for either housing or commercial use would excessively hem in the current and future use of the golf course and ponds (???) to a point that their future would be threatened.</p> <p>We recommend that a new alternative be developed which would creating a public park adjacent to or including the golf course. In order to relieve AFRH-W from maintenance costs, consideration should be given to transferring the new park to the District of Columbia or the National Park Service for management.</p>	<p>alternative disposition by preferably lease (or sale) of Zone C for the creation of public open space.</p> <p>AFRH previously (3-4 years ago) discussed sale of the land to DC and NPS, and was told of an extensive maintenance backlog (~30 years) and no capital acquisition funding. Language has been added to the Master Plan that states AFRH's willingness to forgo any needed future development of Zone C if a suitable financial deal is reached through sale/lease or other arrangement.</p>
National Park Service	The draft Final Master Plan does not provide an adequate assurance that the above-mentioned areas will in fact be preserved in an adequate manner if hemmed in by medium to high density housing or offices, as indicated by the current document.	The draft Final Master Plan states very clearly AFRH's intention to keep and maintain the golf course and ponds for the use of the residents for recreational activities.
National Park Service	Within the proposals for the development of the AFRH sector is the proposed replacement building for the demolished Sheridan Building. This new building should be of an architectural character and appropriately landscaped to be sensitive to the historic scene around the Lincoln Cottage, which would include the view and setting of the building from all directions, including the view of the building and its landscape setting when viewed from Rock Creek Church Road.	The draft Final Master plan specifically identifies design (p. 53) and landscape (p.57) guidelines for the replacement Sheridan Building. Further language related to landscaping / screening comments has been added per the National Trust's Comments below.
National Park Service	The entire length of Rock Creek Church road is a rare intact survival of a 19th century landscape, passing the historic west gates of the home, of which the Eagle Gate is the only operational gate, and culminating and passing between Rock Creek Cemetery, the National Cemetery, and the northern fenced boundary of the home. Traveling along this sector one feels to have stepped back in time and to have	<p>Much of Rock Creek Church Rd. is adjacent to the AFRH zone, where little / no development is slated to occur. Existing trees and open space will be maintained in this area.</p> <p>The area of Rock Creek Church Rd. adjacent to Zone C and the view into the site from that area has been addressed</p>

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	<p>experienced untouched 19th century Washington. Recognized as only a boundary in this plan, the views up and down and across Rock Creek Church Road and their preservation are paramount view sheds, and should be included and analyzed in this Master Plan. The great historical sensitivity of Rock Creek Church Road should be clarified and emphasized, that Lincoln traveled this road to the Home and to the cemetery north of it, and that much of it remains intact. The document should be expanded to address this resource and more detailed and definitive manner.</p>	<p>through the reduction in density in Zone C and the shifting of development to the east and south. The Master Plan also includes landscaping guidelines whose intent is to preserve the bucolic character of Zone C and the view into the site. There is specific design guidance on p. 129.</p> <p>In addition, the following language has been added to the Zone C section regarding Lincoln's path:</p> <p>"The northeastern most range of buildings should be carefully designed and sited to minimize impact on the view from Randolph Gatehouse and the President Lincoln pathway."</p> <p>"Vegetative screening should be enhanced if necessary to protect the views from President Lincoln's pathway and the Randolph Gatehouse."</p>
<p>National Park Service</p>	<p>The document does not provide specificity as to the overall landscape of the treed campus to allow for the document to provide direction for future decisions. The illustrative presentation of street trees as discussed in Streets and Streetscapes, showing street types on page 28-29 could well be argued that the street trees of Area A would only need to be 12 to 14 feet tall at design growth. Since these heights do not reflect the illustrative trees that are presented in other photos and renderings in the document, it is unclear as to the design commitment to be followed. This should be clarified in detail as to the projected size of trees in the plan. This is especially true of the roads proposed in Area A since the amount of root space that would be necessary in order for trees to be viable should be commensurate with the intended size of the trees in the plan. Planting trees in undersized root spaces results in stunted growth and size as well and higher susceptibility to disease and mortality.</p>	<p>The guidelines on p. 27 of the document state that existing streets in the Master Plan will retain existing rights-of-way. This guidelines also state that new streets will complement the existing street network, as deemed necessary, by retaining existing street patterns and alignments to the extent possible and respecting the qualitative character and materiality of the existing streets. This includes the use of brick sidewalks, granite curb cuts, quality street lighting, and sizeable street trees.</p> <p>An overall landscape / treescape goal as been added to the development objectives section, and additional landscape / treescape guidance has been added to the both the sitewide design guidelines and the guidelines for each Zone.</p> <p>Also, AFRH has committed through the PA and ROD to develop a detailed Landscape Master Plan which will provide more specific landscape and treescape guidelines.</p>

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National Park Service	<p>Similarly, the description of the intended treescape along Pershing Drive and around the edges of much of the open areas leaves a great deal to interpretation with little quantification of size. The only specificity that is noted for tree species is under Zone C Landscape Guideline where specific tree species are called for. Since the normal growth of Sugar Maple, London Plane Planetree, Willow Oak and American Elm range from 70 to 100 feet, or more, which would match much of the large tree growth on the Campus, the reader could presume that this is the design intent. This is not clearly articulated to sufficiently assure that the streetscape of Pershing Drive would be designed to assure the long term preservation of the sense of the tree lined drive. Since the trees of the campus and the edge of the campus open spaces are integral with the historic setting and image of the AFRH, the plan must reasonable be expanded to present a more detailed vision of the future of this important component.</p>	<p>The treatment of Pershing Drive is specifically addressed in the PA.</p> <p><i>Pershing Drive Street Trees, south and east: Developer will preserve the historic orientation of Pershing Drive and shall preserve, to the maximum extent possible, the allee of trees bordering Pershing Drive. If not possible to save all the trees, the Developer will replant trees of the same species with the intent of restoring the historic allee;</i></p> <p>There is also material in the Master Plan dealing with the site perimeter (p. 35)</p> <p><i>Beyond the perimeter wall and fencing, a dense vegetative buffer serves to insulate much of the Home from the surrounding urban fabric, while allowing some screened views into the site. In some places (particularly along the site's eastern boundary at North Capitol Street and portions of its southern boundary along Irving Street) plants have been lost and/or invasive plant species have proliferated. This vegetative buffer should be preserved and enhanced with additional plantings. Invasive plant species should be removed on a regular basis to prevent damaging overgrowth. In places where more recent development caused the removal or thinning of the buffer plantings, reforestation with similar species should be introduced to supplement existing plantings and thereby reinforce the character of the buffer zone.</i></p> <p>We have also added language landscape / treescape that directs the retention of 'form and function' of trees and tree canopies in both the Master Plan objectives section, and sitewite design guidelines. This language provides an overarching goal for the plan that will be the basis for the</p>

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		detailed Landscape Master Plan required by the PA.
Casey Trees	The Columbia Heights, Petworth, and Park View neighborhoods, which lie just west of the AFRH, are in dire need of additional parkland. According to the District's 2006 Comprehensive Plan, the Mid-City Area (west and south of the AFRH) is one of the densest neighborhoods in the city and yet it has the lowest ratio of park acreage per resident. Recent development in Columbia Heights and planned development at the Petworth Metro Station and McMillan Reservoir sites further exacerbate the need for additional parkland.	AFRH will make over 20 acres of open space accessible to the public in Zone A alone. This is over 25% of the total area of Zone A. In addition, if Zones B and C are developed, there would be additional public open space provided as part of the development.  In addition, the Final MP contains a discussion of AFRH's willingness to entertain offers for the alternative disposition by preferably lease (or sale) of Zone C for the creation of public open space.
Casey Trees	While the AFRH Draft Master Plan states "Within each development zone, there will be open space created and/or maintained, much of which will be open to the public,." the plan does not specify how much land should be retained as open space, nor how much must be publicly accessible. Neither does the plan provide any guidance on an appropriate mix of park/open space types to serve residents of adjacent neighborhoods, as well as new residents and workers. There does not seem to be any recommendation for interconnectivity of the open spaces in Development Zones A, B, and C, which is a shame given the size of the site and the opportunity to create walking/biking circuits.	In Zone A, there will approximately 20+ acres of open space. If Zone B were developed, approximately 2 acres of open space would be created, and if Zone C would be developed, approximately 5 acres of additional public open space would be provided.  The Master Plan does call for a perimeter green buffer that would be contiguous between the 3 Zones, and would be enhance by bicycle and pedestrian connectivity.
Casey Trees	The plan requires a bicycle path forming a "U" around the southern end of the site through Development Zones A, B, and C. Yet no guidance is provided on the recreational and/or transportation value of the path, such as how it connects to destinations inside and outside the AFRH site and to the larger DC bicycle network. It is also unclear how this trail relates to the existing trees and vegetation along the perimeter of the site and whether the trail will be treelined post-development. It is great to see the proposed creation of several pedestrian entrances to connect the AFRH site to the neighborhoods west of it. Even so, access	The Master Plan shows plans for a perimeter bike path around the southern end of the site. Connectivity to the adjacent bike trails is the purview of NCPD. We do not believe that there are currently identified bike trails immediately adjacent to the site.  Regarding access from the Southwest – access to the site would also be facilitated by the relocation of the existing security fence along Irving St. to a location north of the Zone B development (if Zone B were to be developed), as well as openings in the historic fence along the west side of Zone B.

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	is limited, particularly from the southwest.	The preservation of the historic fence was also a factor in number and location of proposed access points.
Casey Trees	Since the cooling, stormwater management, air quality, and traffic calming benefits of street trees are well documented, street trees should be incorporated on both sides of any new streets. We are pleased that the plan discourages additional surface parking lots. If surface parking lots are installed, not only should they be heavily buffered with vegetation, they should incorporate trees to shade the surface of the lot.	The Master Plan has been modified to say that surface lots are not allowed except for the temporary lot at the LaGarde building. The plan also calls for this lot to be heavily buffered with vegetation.
Casey Trees	We applaud the inclusion of Water Quality Management and Sustainable Design sections in the Master Plan; however, it is important that mention of these techniques be made throughout the plan as appropriate. For example, while green roofs are encouraged in Section 14, they are not included in the Built Form Guidelines for each zone, which state "Flat roofs are acceptable. Slate, tile, and/or standing seam metal roofing is highly recommended." Green roofs need to appear here, as well.	The Master Plan has been modified to add the recommendation for green roofs to the individual zone built form guidelines.
Casey Trees	The Water Quality Management Strategies mentions "smaller, Best Management Practices (BMPs) that are designed to serve individual buildings or paved areas"; however it does not suggest that these techniques are preferred, nor does it suggest how these BMPs could be incorporated into other design objectives for the site. For example, the foundation plantings recommended in the Landscape Guidelines could be designed as rain gardens and used to manage runoff coming from building roofs. The traffic calming devices suggested for AFRH North-Northeast could include vegetated bump outs, which can also be designed to manage stormwater runoff from the roadway surface. Promotion of smaller, stormwater BMPs is happening throughout the District and in the vicinity of the AFRH. In fact, the District's Department of Transportation recently installed two large rain gardens in the clover leaves	<p>Stormwater and water quality are touched on in the Sustainable design section as well through the inclusion of LEED requirements on the project. The Zone A development proposal has been accepted as a LEED-ND pilot project. Lessons learned from Zone A will be considered if further development of Zones B and/or C occurs.</p> <p>In addition, the developer is required as part of the development agreements with AFRH to propose specific BMPs for the individual zones.</p>

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	at the intersection of N Capitol and Irving. Similar techniques should be strongly encouraged on the AFRH site.	
NTHP	Strengthen references to the operation of the Lincoln Cottage by the National Trust	Under the second paragraph titled "Zones", "Lincoln Cottage will continue to be operated by the National Trust as a historic site open to the public" has been added to the Master Plan
NTHP	Include cultural use under AFRH Zone	The word "cultural" has been added to the Master Plan so that the initial sentence of the second paragraph reads: "Development in the AFRH Zone will be institutional, cultural and residential."
NTHP	Include a statement that additional development on the former site of the Sheridan Building must be carefully considered, designed and landscaped to avoid, to the maximum extent feasible, adverse effects on the National Historic Landmark and National Monument	The following language was added to the Master Plan: "Additional development on the former site of the Sheridan Building must be carefully considered, designed and landscaped to avoid, to the maximum extent feasible, adverse effects on the National Historic Landmark and National Monument."
NTHP	Include a statement that if a building is built on the site of the former Sheridan Building, landscaping must be designed to minimize adverse impacts to the views from Lincoln Cottage	The following language was added to the Master Plan: "If a building is built on the site of the former Sheridan Building, landscaping must be designed to minimize adverse impacts to the views from Lincoln Cottage."
NTHP	Include a statement that existing trees should be retained and new trees added to protect the views from Scott Statue to Zone B	The following language was added to the Master Plan: "Existing trees should be retained and new trees added to protect the views from Scott Statue to Zone B."
NTHP	Add reference to cultural use of AFRH Zone for the President Lincoln and Soldiers' Home National Monument	Under the "Primary Use Pattern" the following language was added to the Master: "and as a historic site, the President Lincoln and Soldiers' Home National Monument."
NTHP	Add a statement to the Landscape Guidelines for Zone A that historic and older trees that protect the views from Scott Statue should also be protected and preserved.	The following language was added to the Master Plan: "Historic and older trees that protect the views from Scott Statute should also be protected and preserved."
NTHP	Add a statement to the Landscape Guidelines for Zone B that historic and older trees that protect the views from Scott Statue should be preserved and screening should be enhanced.	The following language was added to the Master Plan: "Historic and older trees that protect the views from Scott Statue should be preserved and screening should be enhanced."
NTHP	The northeastern most range of buildings in Zone C should be carefully designed and sited to minimize impact on the	The following language was added to the Master Plan: "The northeastern most range of buildings should be carefully

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	view from Randolph Gatehouse and the President Lincoln pathway.	designed and sited to minimize impact on the view from Randolph Gatehouse and the President Lincoln pathway.”
NTHP	The landscape guidelines for Zone C should include a reference to the need to enhance vegetative screening if necessary to protect the views from President Lincoln’s pathway and the Randolph Gatehouse.	Include the following sentence: “Vegetative screening should be enhanced if necessary to protect the views from President Lincoln’s pathway and the Randolph Gatehouse.”
DCSHPO Archeologist	The map key lists five areas labeled S through W under the heading "Archeological Sensitivity Zones". The items included here are only 5 of the 6 areas identified to have _historic_ archaeological sensitivity; the areas of _prehistoric_ archaeological sensitivity have been left out. The map on p. 24 of the Master Plan is an adaptation of Figure 8 from the Phase Ia Archeological Assessment of the AFRH by Greenhorne & O'Mara dated October 2004. Data from the companion map, Figure 7, showing prehistoric sensitivity has been omitted.	The prehistoric sensitivity map has been added to the Master Plan.  Further research resulted in the discovery that the “Possible Late 19 <sup>th</sup> -Century Building” was identified as a culvert in an 1873 map. The correct information is included in the AFRH-W Historic Preservation Plan and resource inventory.
DCSHPO Archeologist	One of the locations of historical sensitivity is missing, item 4 (possible late-19th c. building) on Figure 8 from the Phase Ia Archeological Assessment of the AFRH by Greenhorne & O'Mara). It should be at the point labeled W on the Master Plan map.	Further research on this topic has shown the information to be incorrect, thus this item was removed from the map.
DCSHPO Archeologist	The location of item W, the pre-1870 building cluster (item 2 from Figure 8 in the Greenhorne & O'Mara report) is incorrectly plotted on the Master Plan map. The correct location of point W should be near	The map has been corrected.

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	(just north of) number 48 on the Master Plan map.	
DCSHPO Archeologist	<p>The Final AFRH EIS (p. 3-29) identifies the whole AFRH as having "overall moderate probability to contain intact cultural remains" because it "may yet retain intact archeological remains dating to the prehistoric and historic periods." That is a very different statement that what is represented by the map currently on p. 24 of the Master Plan.</p> <p>The Greenhorne &amp; O'Mara report actually concludes that "the project area has an overall moderate probability to contain intact cultural remains. However particular sections of the AFRH property may yet retain intact archeological remains dating to the prehistoric and historic periods" and goes on to recommend "limited archaeological testing for portions of the project area" (p. 26). The Master Plan will not accurately reflect what is known about the archaeological resources at AFRH until the p. 24 map errors are corrected.</p>	The Master Plan language has been modified to reflect the language from the EIS. Requirements for additional testing within the proposed limits of disturbance have been added to the Programmatic Agreement and Record of Decision.
DCSHPO	I think that all of the consulting parties had at one point of another objected to the statement of the following objective in the master plan (p. 7): "Maximize development of the Home while maintaining the historic character of the site and retaining significant existing open space." Ultimately,	<p>The Master Plan goal has been changed to reflect 'optimize'. It now reads:</p> <p>Optimize development of the Home while maintaining the historic character of the site and retaining significant existing</p>

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	<p>the ends of “maximizing” and “maintaining” are contrary and mutually exclusive. “Optimize” or some equivalent—or simply, redevelop to increase revenue—would be an essential substitute, as maximizing development is simply not consistent with the historic stewardship responsibilities of any agency. In the future, in the consideration of any element of the implementation of the plan, the default alternative should not be “bigger” because one of the objectives directs maximization. I think that the consultation has provided both sufficient tweaking and sufficient legitimacy to this major reworking of the campus that you can now claim to be optimizing the redevelopment. And as AFRH has never been able to quantify financial needs or anticipated financial gains, all of the consulting parties have taken a leap of faith that they are both substantial, but the need cannot simply be considered insatiable.</p>	<p>open space.</p>
DCSHPO	<p>P. 11 of the master plan still states that “The development of the site could potentially result in adverse effects to the historic character of the site.” I think we are well beyond such a statement, and the adverse effects were obvious when the first draft MP came out. The entire premise of the consultation, the PA, and the long list of anticipated adverse effects and mitigations is that there <i>will</i> be adverse effects. Substitute language for this statement should be the sort used in the EIS.</p>	<p>The text has been modified to read:</p> <p>“The development of the site will result in adverse effects to the historic character of the site. Through the NHPA Section 106 consultation, AFRH has taken steps to avoid, minimize, and mitigate adverse effects.”</p>
DCSHPO	<p>There are a number of “should” statements and “encourage” or “discourage” statements in the MP. It is not clear who enforces the intent or really if the statements are strong enough to call for any enforcement. Take, for example, the statement that “Additional surface lots are not encouraged, except on a temporary basis” (p. 30). And on the following page, the plan calls for temporary parking near the LaGarde Building. Possible interpretations of this policy statement include that surface lots are not <i>d</i>iscouraged and that surface lots are encouraged on a temporary basis. There is no effort to define temporary in this context, and there is no</p>	<p>All should statements have been changed to shall to provide greater certainty and stronger intent. Each encourage / discourage statement has been looked at to determine if stronger language is appropriate, e.g. required / not allowed.</p> <p>Specific to LaGarde and surface lots, the Master Plan has been modified to say that surface lots are not allowed except for the temporary lot at the LaGarde building. The plan also calls for this lot to be heavily buffered with vegetation.</p>

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	statement that lots will not be approved or that the plan outright opposes them.	
DCSHPO	Although both refer to many of them, neither the MP or PA includes or addresses all of the proposed mitigations for adverse effects. We would recommend adapting the effects/mitigation matrix for incorporation, at least by reference, into both documents to provide guidance and guarantees of implementation.	The adverse effects matrix was used as a working document in the development of the Master Plan and Programmatic Agreement. AFRH used the adverse effects matrix to update the Master Plan and ID specific mitigations for the PA that were not captured in design guidance in the Master Plan. AFRH / developer would be bound by the design guidance in the Master Plan, and the specific mitigations in the PA & Record of Decision. The mitigation actions that are not included in the Master Plan have also been added to Chapter 6 of the AFRH-W Historic Preservation Plan.
DCSHPO	The information about building heights in Zone A appears contradictory. On the one hand, we have a color-coded map that designates heights within the zone ranging from 45 to 65 to 75 to 90-100, and then adds 120 for a couple of spots. The text says "A maximum height limit of 90 feet (residential) and 100 feet (commercial/residential) has been set for all new development in Zone A. However, taller commercial buildings, up to a 120-foot tall maximum, can be located on parcel F and the eastern portion of parcel E. Nonprogrammed projections are allowed up to the height of 100 foot (appurtenance only) in the locations seen on the following page." Now, not only does this suggest that the 120-foot buildings exceed the overall limit, but it seems to say that, despite the heights and bulk shown, it is subject to change. Now, we do not wish to suggest that there should be no flexibility in implementing the plan with respect to each building's height, bulk and massing, but many of the proposed heights are responses to particular view or adjacency issues. The consulting parties have indicated, for instance, particular concern about heights in the area near the Irving Street gate, the Chapel Woods—and, of course,	<p>We have reworked the section on heights for Zone that was not clear. It now clearly reflects that the exception to the 90/100 ft limit is limited to two specific locations and clearly identifies the reason. We have also clarified that even the proposed 120 ft maximum height buildings will be limited to 8 stories.</p> <p>View and adjacency issues were very carefully considered in the setting of height limits. Views to parcels C and D have set limits for those parcels, and other view issues have resulted in the relocation of former parcels G (SW of Barnes building) and L (East of King Hall). The Zone B height limits were set very carefully as the result of the crane tests viewed by the Consulting Parties. A section of this view is contained in the Master Plan.</p> <p>There is also no discrepancy between the proposed square footage in the EIS and the Master Plan. The proposed Zone A program configuration has changed, but the overall density has not. The EIS actually reflects a higher proposed density for Zone C (750k sf vs. 550k sf.) than the Master</p>

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	<p>Zone B. The variation in bulk because of proposed or likely additional height throws the EIS's numbers and assumptions into doubt (the present comparisons between the EIS alternatives are in tabular and not graphic form, not illustrating the differences in bulk or uses but quantifying them). Previously, we had generally been discussing heights in terms of number of stories, but in January 2006, the HPRB adopted the staff report's recommendation that 85 feet be the height limit. As late as at least September 11, Crescent Resources made a PowerPoint presentation at a consultation meeting showing a range of four to eight stories. Now, whether the height or height limit for an eight-story building is 85 feet or 90 may be a quibble, but the appearance of 100 and 120 feet is new information inconsistent with what the consulting parties had previously seen.</p>	<p>Plan or Record of Decision will allow.</p> <p>Heights will still be limited to 8 stories. The 120 foot height is for an anticipated medical facility use, which requires higher floor to floor story heights. For the combined retail / residential parcels, the 90//100 foot limit allows some flexibility to respond to market conditions, e.g condo construction vs. loft-style construction.</p>
DCSHPO	<p>The design guidelines are probably going to have to remain pretty general to permit flexibility. I don't know why it says (nor do I agree with as a principle) only flat roofs in NE zone. Elsewhere, it generally says they are acceptable. I think that a mechanically applied 2- to 6-foot setback of the "upper stories" will succeed in reducing apparent height and creating a "well-scaled urban environment" in Zone A. While undoubtedly well intended, it's not clear what would be considered a upper story, and while a two- or six-foot setback can often be effective massing tool to improve a particular design, it is usually insufficient to make a serious difference in the effect of a large building. The proposed use of bollards in the AFRH zone seems unnecessary and adverse. I couldn't help but observe that the sign guidelines are quite prominent in extent relative to more important matters. One of those more important matters is landscape, and I'm not sure we have enough philosophical or practical direction on the landscape planning end. A landscape <i>survey</i> is to occur, elsewhere referred to as a landscape <i>plan</i>, but it is not clear what the ends will be other than</p>	<p>The use of bollards in the AFRH zone has been removed from the Master Plan</p> <p>Regarding landscape / treescapes, an overall landscape / treescape goal as been added to the development objectives section, and additional landscape / treescape guidance has been added to the both the sitewide design guidelines and the guidelines for each Zone.</p> <p>AFRH has committed through the PA and ROD to develop a detailed Landscape Master Plan which will provide more specific landscape and treescape guidelines. Per the PA, this plan will be reviewed and commented on by the Signatories and Consulting Parties in its development. In addition, the PA identifies two specific landscape projects that AFRH will complete that are consistent with the guidance in the Master Plan.</p> <p>In response to the National Trust's comments, there have been numerous references added to the Master Plan about</p>

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	<p>presumably some sense of restoration. It's also not clear who reviews or approves it. The HPRB, the PA signatories, the consulting parties, AFRH alone? Dave Murphy has made some good points about having a guiding philosophy within each of the cultural/landscape areas as well as practical provisions for successfully landscaping or retaining trees (particularly along new and widened streets). I continue to put in my two cents about the reinforcement of the Chapel Woods, and the National Trust (and NCPC staff) are understandably concerned about buffering the NHL and Zone B, and I question whether one-for-one replacement of trees is appropriate for areas that are mainly buffers or undifferentiated copses of trees, as with the golf course hole replacement and as opposed to a planned allee like Pershing Drive. It seems that equivalent caliper or something in between these two approaches would be the way to go.</p>	<p>the importance of screening and buffering the NHL and Zone C. (Please see NTHP comments above)</p> <p>Guidance has been added to the Master Plan in regard to the form and function of trees and treescapes, which provides more performance-based guidance in terms of tree replacement / augmentation.</p>
DCSHPO	<p>I must return to the Zone C question, of course, and repeat our position that that area should not be developed in the interest of landscape preservation and view protection in the vicinity of the heart of the campus (or avoidance of adverse effects in that immediate vicinity) AND as minimizing the overall change of the campus' redevelopment (i.e., minimizing adverse effects). At the very least, the master plan should explicitly address a no-build option as a potential alternative, even if AFRH needs to suggest that it must nonetheless try to get some money out of it.</p>	<p>The Master Plan has been modified to reflect AFRH's intension to complete the Zone A development and to analyze the financial returns of that development prior to making any decision to develop Zones B and/or C. In addition, language has been added to the Master Plan that states AFRH's willingness to forgo any needed future development of Zone C if a suitable financial deal is reached through sale / lease or other arrangement.</p>