
**HISTORIC PRESERVATION REVIEW BOARD
STAFF REPORT AND RECOMMENDATION**

SECTION 106 REVIEW
ARMED FORCES RETIREMENT HOME, DEVELOPMENT MASTER PLAN

Reviewer: **Tim Dennee**

Date: **January 26, 2006**

Background

The Armed Forces Retirement Home-Washington (AFRH-W¹) was founded as the United States Military Asylum in 1851 (and more recently known as the U.S. Soldiers' and Airmen's Home). The grounds were expanded in the 1870s but were diminished in size during the twentieth century after North Capitol Street and Irving Street were cut through the property and those parts now located across the surrounding roads from the remaining 272 acres were sold off—mainly to the Washington Hospital Center, Children's Hospital, and the Catholic University of America—or otherwise separated, as with the Home's National Cemetery to the north. The AFRH remains a functioning home for veterans of the U.S. military.

The AFRH needs a new master plan for budgetary reasons. Because of a limited and variable revenue stream (derived from a fraction of military salaries, plus the proceeds of disciplinary fines and forfeiture), the Home has been authorized by Congress to leverage its principal asset—land—to make up shortfalls in the trust fund that finances the operating and capital budgets. The AFRH plans, therefore, to consolidate its operations in the northern core of the campus and to retain the golf course, while permitting redevelopment of the remainder of the unbuilt, underutilized or functionally unnecessary portions of the east, south and west sides of the campus. Development will presumably be undertaken by a master developer, providing the necessary infrastructure and providing the Home with revenue through ground leases. The AFRH has received a number of responses to a Request for Qualifications (RFQ) from potential development teams and expects to issue a Request for Proposals (RFP) this summer.

Conceptually then, the AFRH is withdrawing its Home campus boundaries and security perimeter northward, with the remaining areas to be developed or redeveloped, in some cases in a manner that is quite urban in character, bulk and density. Because there are still some Home functions—and residents, in fact—remaining on some of these proposed development parcels, AFRH must also now plan for the relocation of these (especially the LaGarde Building², a health-related residential facility) to the north section of the campus, as well as for any future growth or other needs within the now smaller Home. So the master plan is a combination of development/subdivision plan and a facilities master plan.

¹ There is also an Armed Forces Retirement Home in Gulfport, Mississippi that was severely damaged by Hurricane Katrina, forcing its residents to be relocated temporarily to Washington.

² Existing buildings referenced below may be located on the map on page 20 of the plan.

Because this is federal land and a federal agency undertaking, the plan and its implementation must be reviewed for their effects upon historic properties in accordance with Section 106 of the National Historic Preservation Act. Consultation with interested parties and the public has begun. What follows summarizes many of the comments made by the State Historic Preservation Office, the Advisory Council on Historic Preservation, and other parties with respect to avoiding or minimizing adverse effects on the historic resources present. Review of the plan by the National Capital Planning Commission (NCPC) and the United States Commission of Fine Arts (CFA) is also required; the NCPC will take its first formal look at the document on February 2. And the privately developed portions of the campus are likely to require zoning by the District of Columbia.

The U.S. General Services Administration, RSM McGladrey, EHT Tracerics, and Koetter Kim & Associates are assisting the AFRH with the preparation of the plan.

Historic background

As stated above, the Home was established in 1851, the first national soldier's home in the U.S. and the only one of its era still in operation. The property served as a Civil War hospital and signal station and was the summer retreat of U.S. Presidents from the 1850s through the 1880s. President Lincoln is thought to have penned much of the Emancipation Proclamation in the "Lincoln Cottage" (see Pinsker, *Lincoln's Sanctuary*, 2003).

Portions of the property have been designated five times:

- The Sherman Building was designated a District of Columbia landmark by the Joint Committee on Landmarks in 1964.
- The "Soldiers' Home National Historic Site"—including the original south part of the Sherman Building, the Lincoln (Anderson) Cottage (formerly "Corn Rigs," the 1840s country home of Washington banker George W. Riggs), and Quarters 1 and 2 and surrounding areas—was listed on the National Register of Historic Places and designated a National Historic Landmark in 1973-1974. It was listed on the *District of Columbia's Inventory of Historic Sites* in 1979.
- Finally, in 2000, President Clinton declared the Lincoln Cottage and its immediate environs (including the immediate landscape, a historic water tower, bandstand, etc.) a National Monument.

In 1988, the entire property was determined eligible for listing on the National Register. The draft 2004 report *Armed Forces Retirement Home-Washington Resource Identification and Evaluation* by EHT Tracerics found that such a district would be eligible for listing under National Register criteria A, B and C. The Tracerics study identified 122 resources that would be considered to be contributing to the character of such a district.

In accordance with a programmatic agreement with the AFRH, the National Trust for Historic Preservation has been restoring the Lincoln Cottage and will soon open it to the public, with the nearby Administration Building serving as its visitors' center.

General comments

Perhaps the most important comment is prefatory to all others—a plan for such a historically significant site *must* be derived from and judged by the qualities of the site. Proposed infill construction cannot be understood merely by looking at a two-dimensional map or drawings. The qualities of the buildings and landscapes, the relationships between them, the topography and the important views—within the campus, outward from the campus and inward to the campus (even across the campus)—cannot be fully understood except by direct observation. It would be a grave injustice to the precious historic resources to support any particular development scenario without direct reference to and sufficient analysis of the resources.

This master plan draft is really better understood as a framework plan, as much of the plan itself, not to mention the subsequent development, has yet to be filled in.³ The strategy is to have the expertise of a master development team fill in the blanks, as it were, in accordance with its understanding of what the market will bear. From the point of view of maximizing revenue, this makes sense. It would be preferable, and certainly easier to evaluate effects and impacts, if more detail were now incorporated into the plan (thus giving property owner, developers, public agencies, and the public a higher degree of certainty) itself rather than being something to negotiate later. However, as a principle, we have no objection to a private entity carrying out the rest of the planning, as long as the substantive outcome is good and the appropriate environmental compliance processes are respected. To that end, Section 106 will continue as the plan and each project fills in, and presumably, the consultation will include evaluating the wording of the eventual RFP(s) and assessing the relative preservation strengths of the responses received to both the RFQ and RFP.

The plan is somewhat inconsistent in depth; for a document in which much is left vague, there is oddly a great degree of detail about proposed square footage for each use category with each zone (see pages 9-12; the figures have not been revised since the first draft in April). The explanation is that the area of proposed development has been derived not from a response to the character of the campus but rather from a top-down calculation of what level of development might be necessary to achieve whatever might be the preferred amount of revenue to be received *via* ground leases. But the central principle of Section 106 is that adverse effects upon historic properties should be avoided when *possible*. To accord with Section 106 responsibilities and acknowledge the importance of this site, the first master plan objective (page 6) should put a priority on preservation, seeking to *optimize* instead of “maximize” development.

³ The typical federal installation’s facilities plan or a municipality’s small area plan would specify particular categories uses and would set up a street plan as serving traffic circulation and giving extent and form to development parcels (the plan does suggest a spine road for Zones 3 and 4, which is a likely outcome given the dimensions and orientation of the parcel). Facilities master plans usually analyze specific needs by performing growth projections, identifying inadequacies in the existing facilities, etc. In other words, a master plan represents what its author *intends* to see developed. Because this plan is driven by revenue needs, however, there are a variety of scenarios which presumably could be mixed or matched, and what is intended is simply “whatever’s enough.” Master plans also generally include substantial analysis of infrastructure needs and impacts and explore the means to accommodate them. For example, the issue of traffic impacts is literally a blank here; the chapter is a placeholder for a future analysis. But the presentation of numbers of residential units and commercial square footage followed by the parking space provision assumptions for each would permit one to perform at least a rough calculation of vehicle trips even at this point. Without examining the demands and impacts on one side of the balance sheet, it is impossible to evaluate or consider any specific bulk numbers on the other.

Compliance is the responsibility of the lead federal agency involved, requiring consideration of all alternatives. Decisions about whether and how much development should occur in particular locations are even more fundamental questions than how it is massed or detailed or what mitigation measures might in order. In other words, how much development should we even begin discussing in this instance? Will the way it is developed and the manner in which the revenue is derived be the most effective or efficient? The bulk proposed will clearly cause or constitute adverse effects upon the historic properties present, and it stands to reason that a lesser amount would be likely to lessen such effects. Are the proposed levels of bulk then necessary in any sense? On this essential question, we have received no information besides the figures themselves. Thus far, requests for either an idea of the magnitude of the revenue needs or for the assumptions underlying the area calculations have been rebuffed.

Whatever the underlying assumptions, unless they are fundamentally flawed⁴, it stands to reason that the floor area numbers are higher than necessary. This plan is intended for build-out in 20 years. Meanwhile, the AFRH has stated a fairly urgent need to close a revenue gap. Because it is unlikely that AFRH can afford to wait two decades before closing that gap, then it must expect sufficient revenue sometime prior to that, meaning that even the AFRH considers some portion of what is shown to be *extra*.

It is apparent from studying initial massing models for the campus (see pages 63-65) that the proposed bulk is too great to avoid very serious adverse effects at either the high or the low end of the scale proposed, taken as a whole or as totals for each zone.⁵ The April 2005 draft master plan and the related draft Environmental Impact Statement (EIS) both characterize the full implementation of any of the Master Plan Alternatives as having “direct, long-term, major, adverse [effects] on the AFRH-W Historic District,” plus “indirect, long-term, adverse [effects]” on the President Lincoln and Soldiers’ Home National Monument and the United States Soldiers’ and Airmen’s Home National Historic Landmark. This language has been removed from the present draft. While acknowledging considerations of landscapes, views, etc., there is no analysis of what adverse effects will occur.

⁴ And if the assumptions or the figures themselves are so flawed, they have no business being the central feature of and guiding genius behind the plan.

⁵ The master plan introduces the idea that the AFRH represents and will continue to represent the transition between the residential uses to the west and southwest and the institutional uses to the east and southeast. It may be fruitful then to compare the AFRH with a neighboring institutional campus, the Catholic University of America. Leaving aside the 49 acres of the former Harewood estate recently transferred from AFRH to Catholic (because nothing has yet been built upon it), the university campus totals less than 144 acres in area, compared with AFRH’s 272 acres. Catholic is considered a fairly densely developed campus with plenty of *landscaping* between buildings, but no longer much in the way of distinct or expansive *landscapes*. The exception is the playing fields at the north end of the campus which are analogous to the golf course that would be retained within the Home. The campus presently (as of the 2002 campus plan) has 2,325,367 total square feet of built area. At 0.37 FAR, this is significantly denser than the Home’s. Now, if this same level of density were applied to the larger AFRH campus, it would total less than 4.4 million square feet—or millions of square feet less than AFRH intends *to add* under even its lowest-bulk scenario—with predictably more dramatic consequences to the landscape and historic structures. The proposed density for AFRH ranges from 0.63 to 0.85 FAR overall, but it would be concentrated in certain areas. And these figures do not account for the additional area required for parking: Catholic now accommodates 1,939 spaces, whereas the AFRH master plan calls for 7,500 to 16,000.

While the bulk proposed is very problematic, it is not numbers themselves but the way the development “performs” that is the key. For that reason, in further development of the plan, we hope that AFRH and GSA will take to heart the comments made herein. And for the same reason, the SHPO will not agree to any minimum or maximum bulk numbers, at least absent a very specific development plan, because only when the design meets certain performance standards⁶ will the effects will be manageable and managed—and the numbers will take care of themselves.

A master plan is not necessarily the place for a litany of adverse effects. On the contrary, its preparation should include analysis of the historic character that is not merely descriptive but normative or prescriptive. The purpose of the Section 106 consultation is to see that the final product incorporates the avoidance and mitigation of effects instead of merely acknowledging or intimating them. Specific issues will be addressed below, although the comments are not necessarily exhaustive.

The State Historic Preservation Officer (SHPO) has requested a preservation plan for the campus, and it is now under development and so is unavailable for the present review. Such a plan would presumably include a strategy and mechanism for reuse of the vacant or underutilized historic buildings as well as specific provision for their proper maintenance. It will also presumably address more directly the avoidance, minimization and mitigation of adverse effects.

For the purposes of the master plan, the campus has been divided first into “character areas,” based upon the built and landscape environment, the topography, and the historic and present uses. These have been translated into development zones.

Zone 1

Zone 1 is located at the northern end of the campus, in the functional heart of the Home, and it wraps around the oldest and most important resources. The plan for this section consists of little more than placeholders for possible future construction. The uses at these placeholder sites are partly unspecified and partly designated as a possible parking structure and an additional building that would accommodate the relocation of the LaGarde Building from Zone 3 (and possibly a site for relocated Smithsonian greenhouses). Appropriately, most of the development is proposed for “Subzone 1b,” near North Capitol Street and screened from the more important structures and landscape features by the very large Sheridan Building (#17 on the map on page 20).

But one of these locations is near the southwest corner of the Grant Building (the building at the northern apex of the campus). This is one instance in which the map might suggest that a building might technically “fit” there, but onsite observation confirms that to erect one there would crowd both the Grant building and, even more important, intrude into visual the context of the National Monument.

⁶ These standards include but are not limited to the design guidelines, which are being developed. More fundamentally, they relate to the amount of bulk and where it is placed, and only then to how it is massed and detailed, and finally, to how the remaining adverse effects are mitigated.

It has been argued that constructing a building at that location would be appropriate because a building once stood there. Such a historical argument cuts two ways and is ultimately false, because we must consider effects upon the campus as it stands *today*, not at some idealized past moment. When that building was removed, its functions were shifted to other, existing buildings and subsequently to new, larger buildings, with the Home's operations generally growing, creating a denser context over time. It is logically inconsistent to state that it is acceptable to build at one location to "recreate" a lost structure, while at another location, such as in Zone 3, it is also acceptable to *not restore* a prior condition but to accept the disturbance, in the form of the present non-contributing utility buildings, as a rationale for erecting there more and larger buildings.⁷ And there is little likelihood that a "reconstructed" building in Zone 1a would be of the same size, massing, materials or details of the building that formerly and presumably compatibly occupied that space.

Frankly, even the building located near the southeast corner of the Grant Building is very problematic. When the Grant Building was considered as a site for a charter school in 2002, it became clear that the only problematic issue was going to be the damage to the landscape around the building (and between it and the Sherman Building) as a consequence of paving it for circulation and parking. The point is that it is very easy to ruin both landscape and building settings by crowding buildings too much. The scenario for Zone 1a puts a new building cheek by jowl with the Grant Building *and* the next-door Stanley Hall, both of which would be considered eligible contributing structures.

Zone 2

Zone 2, the Chapel Woods, is the smallest and simplest of the development zones, and one located within what will remain the Home's campus. As its name suggests, it consists of a chapel and surrounding woods, plus a couple of contributing residences. It is bisected by a road and by a clearing (Zone 2b) in which stands a parking lot and a non-contributing auto maintenance building. The importance of the woods is threefold. First, it is one of the distinct landscape areas that remains from before 1877 (see page 18). Second, it comprises the historic setting for the chapel and the historic residences. Third, it constitutes much of the treed area of the campus, not only contributing to the green character of the Home, but also to that of this portion of the rim of the "topographical bowl" that surrounds Washington and includes many of the "Fort Circle" parks, Saint Elizabeths Hospital, the National Cathedral, etc. The importance of this latter feature was acknowledged by the McMillan Plan, and its retention and enhancement has been a principle passed down from that plan to the National Capital Planning Commission's 2004 Comprehensive Plan.

Here, the AFRH has proposed some future expansion of its residential facilities into smaller, detached cottages comprised of one to three units for couples. With an appropriate number and scale, such buildings appear to be suitable use of the site. But such buildings should be clustered on either side of the road *through the existing clearing* in order to conform to the stated aim to

⁷ As an illustration, the construction of the huge Scott Building obviously affected the character and context of the Home's core, as well as disturbing an important axis and vistas south from the Sherman Building. If the Scott Building were somehow destroyed today, the SHPO would certainly support the restoration of its site as landscape but would not oppose rebuilding there in recognition of the present condition.

“retain and emphasize the overall wooded nature of this part of the site,” instead of the cottages encroaching on the woods in order to retain and plant the clearing (page 49). The portrayal of the woods as blobs of green canopy is inadvertently deceiving; the woods is in places only a couple of trees deep, with little understory.⁸ The removal of even a tree here and a tree there could be devastating. While the plan has incorporated the SHPO’s suggested guideline that “new construction should respond to the site’s topography and should not harm or destroy existing trees,” the graphics do not reflect that approach. Indeed, instead of removing trees, those that have been felled by storms should be *replaced* in order to retain and enhance this section of the campus. Such reforestation will have a crucial role as mitigation for the development of Zones 3 and 4 (see below) in terms of retaining the setting of the Zone 2 buildings and generally protecting the northern part of the campus from views of some very urban development. Keeping this important portion of the green rim of the topographic bowl is particularly significant when one considers that the *view* of them from many points will already be cut off or dramatically altered by the Zones 3 and 4 development.

Zones 3 and 4

Zones 3 and 4 are being considered for the greatest bulk of development, and rightfully so, as the area is located the farthest from the core of the campus, and portions of this parcel have been disturbed by the construction of nondescript utility buildings. Because it provides the most fertile ground for redevelopment, this is the portion that the AFRH intends to develop first. It is the subject of the present RFQ and the coming RFP. The parcel is below the grade of the northern half of the campus, which allows opportunities to mitigate the visual effects of sizeable new development.

The zones are not without historic resources, however. In fact, the area contains a cluster of health-related and support buildings, a number of which are contributing and others of which could be adaptively reused.⁹ The most prominent of these is the Forwood Building, a handsome structure with a clock tower visible from North Capitol Street and pictured on the cover of the plan. In addition, the pasture to the east of Forwood (and the tree buffer there) is an important landscape setting, as is the Pershing Drive allée (dating, in form at least, to the turn of the last century) that divides the present Zone 3 and Zone 4 and is also pictured on the cover of the plan.¹⁰

While the urban character and the densities suggested are incompatible with a campus like this, the rationale is that, in order to keep the Home functioning, substantial development is necessary. Conceptually, visually, this portion would be excised from the rest of the campus, and physically, it would be fenced off. Ultimately, this approach is acceptable (only) because this

⁸ A fact that can be best appreciated by a site visit, but is best illustrated in the plan by looking at the left edge of the “Zone 2c” photograph on page 47.

⁹ The LaGarde Building, located within this cluster, is an unfortunate case. A health-related facility, its functions are to be moved north into Zone 1 for greater efficiency. The building is only a decade old, built at a substantial cost, and can hopefully be reused. Its construction resulted in the demolition of a historic building of the same name that stood on the same spot. When the building was proposed, the former management of the Home insisted that there were no viable alternatives to that particular spot for this use.

¹⁰ It is telling that each of the three resources used to illustrate the cover of the document is threatened by potential adjacent buildings and/or, in the case of Pershing Drive, widening so as to retain only one row of trees.

area is adjacent to busy North Capitol Street, because much of the new construction can be obscured from important internal views, and because the south boundary of the campus is not sacrosanct, having been moved to its present location with the cutting of Irving Street.

While the specifics here have not yet been worked out, the plan probably accurately represents the bones of it. With two existing access points—at the North Capitol Street and Irving Street gates—there will likely be a spine road connecting those two points, with perpendicular side streets. Because the allowable heights (generally up to 85 feet) are tied to the widths of streets and because this would be the widest road, it can be assumed that utility-maximizing behavior will lead to most development lots having frontage on this street in order to take advantage of the height.

Again, considering the AFRH's financial picture, the 85-foot height must be found both acceptable *and* pushing the envelope, because it is equivalent to that of the tallest building on campus—not one considered particularly sensitive to the prior context—and comparable to the highest buildings at the hospitals south of the property. The proposal for 130-foot-tall buildings, on the other hand, seems very difficult to justify and very incompatible because of the effects that such buildings would have on views in and out and because the city's 130-foot heights only occur downtown and in the New York Avenue corridor. There is nothing comparable in the vicinity.¹¹ The trade-off of greater height for more green space around such buildings might be meaningful for designing *within* Zones 3 and 4, but it would be deleterious to the surrounding context. Following the logic that this section of the AFRH will now have a very different character, its density should be concentrated as much as possible at the center of the development zone, along the spine road, with occupants having access to open space around the perimeter of the new development lots, including within a green buffer along North Capitol Street, in the pasture east of the Forwood Building, along the southern edge of the Chapel Woods, and in much of the present Zone 4 south of the Forwood and extending west. The key is carefully delimiting the area in which the development may occur.

The western limit of the development zone is partly bounded by the cluster of buildings including Forwood, assuming that many of these structures can be reused and will not be proposed for demolition. But the rest of that boundary should be determined with viewshed protection in mind. The earliest graphic analysis of views portrayed on page 21 is not as complete as those on pages 26 and 27. As a rural site on the edge of the topographic bowl, the principal view from the Home was always the Capitol (and that fact undoubtedly influenced Riggs's selection of his country house site in the early 1840s). But while the due-south view of the Capitol is most important, that view should not be saved to the exclusion of all others *nor should it be narrowly framed between large, future buildings*. From the upper part of the site—at the Scott Building or Quarters 1 and 2—the view is panoramic, including much of the city to the south and the southeastern edge of the “bowl.” And it must be kept in mind that the view goes both ways, including from the southern section of the city and the Maryland suburbs toward this largely green highpoint. Further, to protect the setting of the National Historic Landmark, the earliest section of the Home, sizeable new construction should be kept on the opposite side of

¹¹ If the private development does require zoning by the District of Columbia, it would seem unlikely that such a height limit would be promoted or permitted here.

the Forwood/ King Health Center cluster. Specifically, the western boundary for Zone 3 should be on a sightline from Quarters 2 to the west end of the Forwood Building. Such a line is fairly close to the gray line depicted in the map on page 26 terminating at the Glenwood Cemetery at bottom of the graphic.¹² In addition to protecting long views to and from the Home and retaining the most important views within, this would also preserve the prominent view of the Forwood Building from North Capitol Street and the hospital center (suggested in the map on page 27 but superior to that depicted on the plan's cover).

The plan shows that most of the largest buildings would be kept east of this line, but it suggests that if lower buildings could be placed within the major views without harm because of the grade (see page 60). Even leaving aside the fact that what one *looks over*, particularly in the foreground, greatly effects the qualities of a view, the illustration is misleading. The Home is on an eminence and its views are *downward*; conversely, distant views to it are generally *upward*. A horizontal view at a 300-foot-above-sea-level elevation that narrowly misses the top of a building will consist primarily of sky rather than of the Capitol rising in the midst of the federal city. This section view does, however, illustrate how important will be the enhancement of the Chapel Woods as mitigation for the adjacent 85-foot-tall buildings.

It is recommended that the arrangement of Zones 3 and 4 be rethought so that the development zone east of the Forwood Building comprises Zone 3 and that Zone 4 be the health center cluster itself and the surrounding lower buildings plus the pasture. This is not to imply any necessary functional separation of the two, but only that the larger, new buildings will be in Zone 3, and Zone 4 will include a number of reuse opportunities with the possibility of placing smaller-scale buildings (such as the existing Barnes Building and Ignatia Guest House) south of Forwood and perhaps north and west of LaGarde and Forwood, along the golf course's edge and east of the Quarters 2/Forwood sightline.

Zones 5 and 6

As a whole, Zones 5 and 6 contain the most intact historic landscapes, much of which was present as early as the 1870s, including wooded areas, historically cultivated land, and the lovely "fishing" ponds.¹³ The most eloquent argument for preserving this area (which is actually continuous with the rolling meadow and treed areas at the south of Zone 4) is to stand on the site and take it in. Particularly with the Zone 3 development interrupting views from the south toward the Chapel Woods, the green space here is crucial both in itself and to keep uninterrupted views to and from the Quarters area. The four- and eight-story development proposed cannot help but radically transform these areas and affect the setting of the National Historic Landmark to the north. And part of that setting is the approach to the landmark area; these zones bound the route that Abraham Lincoln took daily to his summer retreat—a route soon to be followed by many visitors to that retreat.

Unlike Zone 3 that is adjacent to a traffic artery and large institutions, this edge of the campus is adjacent to a low-scale, early twentieth-century, residential neighborhood. The master plan helpfully recommends preserving the "axial vistas [on the east-west streets] from the Park View

¹² That line is actually somewhat to the west of the one here recommended.

¹³ Unlike the Chapel Woods, for instance, there is no parking lot through the middle of it.

neighborhood through to the AFRH-W landscape...to preserve the traditional relationship between the historic neighborhood and AFRH-W” (page 75). And what the associated photographs depict is the trees and lawn that terminate the streets beyond the Home’s historic fence. Merely extending the axes by lining up new townhouse streets on the opposite side of the fence will obviously destroy a great deal of the park-like landscape to which these axes relate and will push the green edge—to the extent that it would still be seen—back toward the golf course.¹⁴

While the scale of such townhouses might generally relate to what is across Park Place, the suggestion of eight-story, multiple-family residential on Zone 6b is inexplicable. Sure, stepping up well east of the Park View neighborhood could reduce visual effects there, but it would put an awful lot of bulk in the viewshed of the National Historic Landmark. Similarly, although the adjacency of the ponds to the imagined Zone 5 buildings seems like a terrific amenity for their occupants, the construction of the buildings at the southwest corner of the campus would transform that area from park to office park.¹⁵ Nor would such buildings bear any relationship to the neighborhood across Park Place.

It is recommended that the plan be revised so as to exclude any treatment of Zones 5 and 6 for the time being. Development on Zones 3 and 4 could proceed without having to address some of the thorniest issues now. And if that proves to provide sufficient revenue for the Home in the meantime, then the development of the west side of the campus could be tabled permanently, as constituting an eminently avoidable adverse effect. While it may seem contrary to general planning principles to be less than comprehensive in approach to such a campus, in this case it is an acceptable course, especially considering that the three major parts—Zones 1 and 2, etc.; Zones 3 and 4; and Zones 5 and 6—are proposed to be functionally and physically separate entities anyway.

Finally, the disposition of Zones 5 and 6 will presumably determine the course of the Home’s new security perimeter fence (see pages 24-25). It may go without saying that the design of such a barrier through this campus will have to be very, very sensitive to the landscapes and to the visual relationships of all the significant resources.

¹⁴ The golf course is arguably the least historically significant landscape. Its principal quality is that it is green and gives depth and continuity to the surround landscapes. It is difficult to imagine how the golf course could be intensively developed—should the AFRH wish it—without strongly affecting the important character areas to its north and west, not to mention the effect it would have upon views. As it is, while some development would be possible at the margins, a water reservoir sits under the middle of the course.

¹⁵ In addition to being a home for veterans, the property served as park for city residents until after World War I, very much in the Victorian Romantic landscape tradition. Although review through the Section 106 process cannot specify uses—other than applying the Secretary of the Interior’s Standard 1, that recommends retention of the historic use or the adaptation to a use that requires minimal change to a resource—many neighborhood residents have advocated returning the unbuilt portions of the campus to a public park use. Again, while a property owner cannot be compelled to give over a portion of his property for someone else’s use (at least without compensation), putting plans for Zones 5 and 6 on hold would give all the parties an opportunity to explore whether there is any room for agreement on that matter.

Suburban office parks are frequently characterized by expanses of green space plus focal water features made of stormwater retention ponds and, of course, expanses of parking. Their built densities are often very low—in fact, less crowded than Zone 5 would appear to be in the massing models on page 71.