

Response to Comments on Draft Supplemental EIS

The Draft Environmental Impact Statement (EIS) on the Armed Forces Retirement Home (AFRH) Master Plan was issued on May 20, 2005. The public comment period extended from the date of issuance through July 5, 2005. A Public Hearing to present the findings of the EIS and solicit comments on the document was held on June 22, 2004.

In addition, written comments were received from 67 federal and local agencies, community organizations, and individual citizens. Thirty-three (33) citizens spoke at the Public Hearing. Comments received at the Public Hearing were recorded by a stenographer.

Comment Number	EIS Section Number	Commenter	Comment
1.	General	AFRH Home Master Plan Committee	Chapter 1, page 1-9, 1.9.1, Impact on Security and Safety of Residents The issue of maintaining the security and safety of the AFRH-W resident community pre-construction, construction and post construction is not discussed within the current draft of the EIS. Question: how will this issue be addressed and/or mitigated?
2.	General	AFRH Home Master Plan Committee	In several areas within the EIS the KHC is referred to as a hospital. Question: Will consideration of KHC as a health center rather than as a hospital have any impact on the final Environmental Consequences contained within the EIS?
3.	General	Barreto, Carlos and Sandra Kenngott, Christine McGilvray,	If land is to be developed under "GOV" zoning, then all government building standards must be applied, including the most up-to-date environmental standards. For example, the EIS should detail that any development on GOV-zoned land would have to be GSA LEED certified.

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		Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	
4.	General	Carstensen, James	<p>The impact study talks about having no impact on historic monuments. Considering the historic value of these grounds, we ask what is the rush? What is the rush to lease this precious surrounding land for eight-story condos, massive buildings with huge asphalt parking lots, and the accompanying traffic jams and smog? Once the land is developed it's gone forever.</p> <p>We believe there is a better way. There are ways to generate revenue from the land without destroying it. There are ways to get the Armed Forces Retirement Home the money it needs without building upon one of its most precious resources. Some would have us to believe that this debate is about whether to erect six-story buildings or four- story buildings or to put condos here or there. That's a false debate. The issue is this. We need to make sure that the Soldiers Home doesn't fall under further financial neglect. Let's get the home the financial resources it needs but let's not sacrifice this great asset....</p> <p>What we see is a rush to development. This issue is far too important to take the expedient way out. If we do our children and grandchildren will never see the land as Lincoln saw it. There is a better way. Working together we can do the right thing not only for ourselves, for our community, but for the entire nation and all generations to come.</p>
5.	General	Catherine	150 years of tradition down the tubes, the military veterans squeezed into a few

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		McCarthy	acres of what used to be their beautiful and peaceful home. What a shame.
6.	General	Crandall, Bill	Any development should be guided by firm, well-articulated guidelines mandating exceptionally high architectural quality, design/aesthetics, balance of uses, and good integration into existing neighborhood fabric. Especially in parcel 6 in areas adjacent to residential Petworth and Park View. If profit for the Home is the sole motivation and the highest bidder wins, we could end up with clumsy, ugly, ill-conceived projects that will potentially degrade - rather than enhance - the greater community
7.	General	DC Office of Planning	The planning/development goals of the McMillan Sand Filtration site can be applied to the AFRH site. These include: 1) providing publicly accessible recreation/open space; 2) preserving and adaptively reuse of site features; 3) creative development of the site, such as incorporating historic features, civic elements, and green buildings; 4) mitigating neighborhood impacts; and 5) maximizing revenue-producing opportunities on both private and non-profit components of the site.
8.	General	District of Columbia Department of Housing and Community Development	DHCD understands the need of the AFRH to create a development Master Plan that will be used to sustain the AFRH in the long-term, by replenishing its primary sources of operational funding, the AFRH Trust Fund. You proposed to accomplish this with revenue derived from the sale or lease of surplus parcels of land on the AFRH North Capitol Street Campus. We note that Congress has authorized, as part of the National Defense Authorization Act for Fiscal Year 2002, the AFRH to sell or lease any property excess to its needs, with the approval of the Secretary of Defense, for the specific purpose of replenishing the AFRH Trust Fund.

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			<p>DHCD applauds and supports the AFRH for developing a Master Plan concept framework that has identified six zones of surplus land around the perimeter of the AFRH Campus that can be developed without compromising the historic landmark character of the historic core of the Campus.</p> <p>DHCD supports the development of infill institutional uses that will be compatible with current AFRH operations located in the designated Zone 1 development area. This specific proposal is common to all four Master Plan development alternatives presented.</p>
9.	General	Douglas, David	<p>I am a neighbor. I'm 40 feet from the Soldiers home and the young man from the Hospital Center that said he was a neighbor, that was part of Soldiers Home. That was the apple orchard that I played in.</p> <p>They had another meeting here when they put the three hospitals down there. Veterans and the Hospital Center, and they said that they were going to move the orchard and now that's the parking lot for the cathedral. That's where the orchard was supposed to be. So let me tell you once they start they are not going to stop.</p> <p>You can come in any gate in this place. I taught my son how to run cross- country right in this park. Security got bad and instead of trying to solve the problem they locked the place up. And you can't keep fear out. You have to face fear. You can't just keep locking yourself up. And that's what you have to do. And if you let them start pouring the concrete you are going to lose this place and you need it.</p>
10.	General	Felder, Charles	<p>As with other zones, more comprehensive alternate plans are needed in order to assess the heavily adverse environmental impact of construction on the area of zone #1 and the health hazards to the in-dwelling population.</p>
11.	General	Felder, Charles	<p>Why are the Sheridan and Scott buildings not sensitive areas in regard to air</p>

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			quality, noise and the debris of construction in Zone #1?
12.	General	Felder, Charles	Is it necessary for King Health Center to be evacuated to the proposed new King Hospital complex in Zone #1 before development begins in zone #3?
13.	General	Felder, Charles	When will construction begin on the King Hospital Complex, which will be directly adjacent to the dormitories of Independent Living, Assisted living, COPD, dementia patients and the clinics?
14.	General	Hafvenstein, Lauri	It is my conclusion that the EIS fails to address the impact of such large-scale development on the city and the surrounding neighborhoods in terms of traffic, air quality, storm runoff, temperature and noise. It fails to address the need for retention of green space and the initiatives by the federal and local government to expand and enhance public use parklands.
15.	General	Jackson, Latosha	I, too, like Mr. Douglass who lives 40 feet away from Soldiers Home, have sentimental feelings about allowing such a large development to be built. There are lots of kids in the area and traffic along the side streets will be unbearable. I have lived in the neighborhood 40 years and I am sure money can be raised to help the soldiers in another manner.
16.	General	Jones, Amina	As a 19 year old college student that is contemplating joining the Armed Forces, I think that with the property that they want to develop should be used for another retirement facility. I know that if I in fact decide on joining the armed forces and one day I will in fact be a senior, I would want somewhere to go when I am too tired to take care of a house or other property that I might own. This estate was created for veterans, people that have served their country well... I say no construction on the soldier's home.
17.	General	Larson, Michael	Maps of the site showing outlined borders of potential development zones, simple

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		Maready, Gerald	square footage estimates, and projected simple financials do not provide the information necessary in order to adequately determine the effect of the proposed master plan upon the historic fabric of the AFRH-W, upon the historic fabric of surrounding neighborhoods, upon surrounding roadways, and upon the local environment. The DEIS (and by extension the Final EIS) is useless without inclusion of the full proposed master plan; it seems impossible to make the determination of effect presented in the DEIS with the bare-bones information about the proposed master plan that has been provided.
18.	General	Marlow, Jacquelyn	There should be a balance between the need and the community. The presentation of the proposed building should not contrast what is already established in the neighborhood. This is to say it should not look like downtown DC Chinatown but that it should blend into the style and fashion of the established neighborhood.
19.	General	McGilvray, Andrew	As a matter of law, we must question the accuracy of the DEIS's characterization that AFRH parcels leased for development (instead of being sold) would remain subject to "GOV" zoning, rather than be subject to the District of Columbia's municipal commercial/residential zoning. We maintain that the uses proposed in the Master Plan documents are not inherently governmental in nature and, therefore, that D.C.'s municipal commercial/residential zoning authority would apply regardless of whether the land is leased or sold.
20.	General	MedStar/ Washington Hospital Center	MedStar/WHC fully supports the concept of development of the property being proposed in the plan. As the owner and operator of the medical complex on land immediately to the south across Irving Street, we believe that appropriate development compatible with AFRH and neighboring uses is important for the efficient use of land to benefit the community and City as a whole.
21.	General	MedStar/	The clinical and research components of MedStar/WHC's plan have a unique

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		Washington Hospital Center	compatibility with the mission of the home and could assist in providing or coordinating development for this important site. In addition, the site would allow the expansion and renovation of WHC facilities, which can become a model for the delivery of medical services.
22.	General	MedStar/ Washington Hospital Center	MedStar/WHC has the capacity and will pursue the opportunity to develop the entire property in an integrated and intelligent manner, respectful of the community and AFRH residents and guided by the leadership of AFRH.
23.	General	National Trust for Historic Preservation	We ... urge the Armed Forces Retirement Home to very carefully consider the impacts of the master planning process. In earlier master plans changes were made to the property that we now know dramatically changed the property and affected its historic character. We would not want to see that happen again.
24.	General	National Trust for Historic Preservation	<p>First, as you all know, the draft EIS makes it very clear that there will be under these development alternatives long-term direct, major, and adverse impacts on the historic resources. We think the draft EIS needs to be looked at and modified to address those a little bit more carefully. For example, most of the alternatives that are proposed propose a great level of development and we think that alternatives should be looked at that can achieve some of the goals the Armed Forces Retirement Home is trying to achieve but reduce the level of development and therefore can reduce the impact on historic resources.</p> <p>Particularly in that regard are the views from the Armed Forces Retirement Home. Many of you know that President Lincoln enjoyed those views and was undoubtedly inspired by those views as many of you all have been. We want to make sure that the development alternatives that are looked at are done in a way that they will minimize the impact on those views over the long term.</p>

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25.	General	Patykewich, Leslie	One of the draft EIS objectives indicates that the Master Plan will “ <i>preserve and improve the essential components of the AFRH-W for residents and the community</i> ” However, most EIS findings indicate <i>minimal negative impact</i> on diverse aspects of the environment, indicating few or any areas where the options contribute positively. In general, it appears the draft EIS falls short in showing improvement and preservation of the historical value, the environment, and the city’s absorptive capacity.
26.	General	Patykewich, Leslie	According to the draft EIS, the Master Plan will “Grow the Trust Fund to not only meet the needs of today’s residents, but the needs of future generations as well.” It does not appear that the EIS has adequately addressed quality of life needs of the current residents nor the long term requirements of the AFRH to meet the future (and likely growing) needs of veterans. (Again, I refer to the thoughtful comments of our veterans and concerned community on this matter). This should be the real goal of any proposal and I would encourage their current and future needs to be elevated to the highest priority.
27.	General	Patykewich, Leslie	Although, the Master Plan indicates it will “ <i>Attract development, at fair market value, that is compatible with the mission of the AFRH</i> ”, I am concerned that fair market value does not take into account the need for low income housing or the need to maintain the wonderful diversity of the community. The environmental justice findings indicate that low income and minority populations would not be disproportionately affected by impacts of the alternatives. However, there appear to be no benefits to these groups in terms of housing options. Furthermore, I would like clarification as to how residential housing, retail, and office buildings are “compatible with the mission of the AFRH.”
28.	General	Prather, Marcel	As do many of my neighbors, I find it hard to accept that alternatives which won’t

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			<p>ruin the very nature of the Soldier’s Home as a retirement community and take away one of D.C.’s few remaining open spaces, have all been explored. I also am convinced that no matter which of these development projects is selected, noise and traffic will impact the surrounding neighborhoods profoundly. I urge the planning committee to consider the negative impact all of these development scenarios will have on both the Soldier’s Home residents and our neighborhoods.</p>
29.	General	Quick, George	<p>Proposed plans 2, 3, and 4 call for institution development in the area around the Sheridan building. This opens a whole can of worms. Institutional can be anything from a prison to an insane asylum.</p>
30.	General	Richardson, Janisha	<p>I am a resident of Columbia Heights on Princeton Place, NW. I ask that the EIS look into having a public park instead of selling the land to developers. I also ask that the community have strong voice in the development of the land.</p>
31.	General	Robert Davaney	<p>4-26: The AFRH-W is zoned GOV, Government and therefore is not subject to local zoning regulations unless portions of the site are sold to private parties. Implementation of the AFRH-W’s Master Plan would result in a considerable change to zoning on the site if segments of the AFRH-W are sold. If the land for development were leased, it would be subject to zoning.</p> <p>Based on the statement that leased land is not subject to zoning because the AFRH-W is government, this exemption, when applied to Home Residents, has a positive effect because Home Residents will be exempt from DC control and may keep the domicile of their choice. This will allow residents to vote for their Representatives and Senators. A domicile in a “No State Tax state” will have a positive effect on our Home Residents.</p> <p>4-30: In addition, the presence of the AFRH in the City would bring the benefit of</p>

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			<p>tax revenue from any resident employee, as well as local commercial entities that do business with the AFRH.</p> <p>“Resident employee,” If the employee is a resident of DC and employed at AFRH, yes, they should pay DC taxes. But if it means a Home Resident employee working in AFRH, that creates an issue. Present policy does not provide for home Residents to work for a salary at AFRH. No effect on the social status of AFRH residents.</p> <p>3-18: According to the District of Columbia Generalized land Use Map, land use on the AFRH-W is characterized as “federal,” meaning that the land and facilities onsite are occupied by the federal government (DC Office of Planning, 2002).</p> <p>A site occupied by the federal government should be considered a “Federal Instrumentality” and immune from State control. DC has characterized AFRH-W as “federal.”</p> <p>3-23: Sales and Use Taxes: This District of Columbia imposes sales and use taxes on the purchase or consumption of tangible personal property or services with the District.</p> <p>Sales or use at the AFRH-W are not within the District and taxes should not be collected. This is a positive impact on the social status of Home Residents.</p> <p>3-24: Individual Income Taxes: Individual income taxes re levied on all individuals who are domiciled in the District. (Black’s law Dictionary describes a domicile as the place a person states that it is where his is to live permanently and when he is absent, he will return.) AFRH-W Employees who are residents of the District would pay individual income taxes. (Of course, if they live in the district and work at AFRH-W, they should pay DC taxes.)</p>

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			<p>AFRH-W residents may be domiciled in another State. Voting rights are not removed from a resident domiciled in another state and the income tax laws of that domiciliary prevail. Full application of 3-24 will have a positive effect on Home Residents.</p> <p>3-25: In 1851, the Federal Government purchased farmland surrounding the Cottage to form the historic core of what was called the Military Asylum (HFH, 2004). General Scott used some the \$175,000.00 to pay his troops, buy supplies and offered the remainder to Congress to establish the Soldiers Home (ibid).</p> <p>US Code, Title 24 is entitled “Hospitals and Asylums” and the Armed Forces Retirement Home is established under Title 24. In my opinion, being an inmate in the Asylum is not at all bad. We are definitely not under the control of the District of Columbia.</p> <p>3-29: The same area was listed in the National Register of Historic Places as a historic district in 1974. the area designated as Nation Historic Landmark was listed in the National Register of Historic Places as a historic district on February 11, 1974, under the name “U.S. Soldiers’ and Airmen’s Home” (EHT Traceries, 2004).</p> <p>3-31: In 1988, The District State Historic Preservation Officer (SHPO) determined that the entire 272 acre AFRH-W property is eligible for listing in the National Register as a Historic District.</p> <p>The rationale of my comments is to verify that when the final EIS is accepted that Home Residents of AFRH-W will keep their rights to declare a domicile of their choice and enjoy the voting rights and taxing authorities of their choosing.</p> <p>Residing at AFRH-W for medical or whatever reason must not mandate that</p>

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			residents forfeit their hard fought-for privileges and rights. It should be resolved that if Zoning and other various and sundry laws are not enforceable on AFRH-W property, why aren't AFRH-W residents entitled to the same consideration?
32.	General	Shelley, Allison	Please reconsider, this project will forever change the historic nature of this valuable piece of property – one of the very few green spaces left in our city, as well as a historically significant landmark. Surely there are more environmentally responsible ways to raise the needed funds. Judging by the comments made at the public hearing, it seems that neighbors and home residents had not been contacted about any of these plans before they were created. Let's take some time here. It seems reasonable to assess the resources available – including government grants and subsidies for the preservation of open green spaces, before launching into massive, irreversible development that does not enhance the community with needed parks, etc. but surely promises to worsen traffic and parking issues in the neighborhood.
33.	General	Stephens, Arlus J.	The DEIS overlooks the historical importance of the property and maintaining its coherence. There should be more detail in the DEIS including consideration of knowledgeable sources on the subject, such as the Advisory Council on Historic Preservation (federal entity) and the National Trust for Historic Preservation.
34.	General	Sullivan, Matthew	I find the proposals contained within the draft EIS to be far too potentially damaging to the environment of NW Washington DC. I believe that the sheer amount of concrete and asphalt alone will disrupt the local ecosystem. The current green space acts as a natural buffer to the heat retention and decreased drainage of the concrete that exists outside the home.
35.	General	Swanson, Lisa	I know some people think there should be no development here at all. I'm with the Sierra Club. You might think I'd say that too but sometimes development in an

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			already developed city area if it's done well, if it's done ecologically and with the people in mind, is better than creating a sprawl elsewhere and knocking down trees in a lot of other places.
36.	General	Sylvia, Elton Sr.	As I look over your Environmental Impact Statement, this plan could be prosperous for the AFRH. Also it could become a financial drain on the budget. I can also see the AFRH-W in the future will lack admission to the home forcing the home to close. My questions... if this should happen would the "US Old Soldier's Home" become a National Historic Preservation Museum? How about a Granite Wall with all residents that have lived here from 1841 to present, have their names engraved? Our grandchildren and great grandchildren would have a great time.
37.	General	Valenti, Cliff	Personally, I am against development of any of the property of the Armed Forces Retirement Home (especially zone 6 along Park Place), with the exception of renovation / expansion of existing buildings. I believe redevelopment along Georgia Ave is essential to the quality of life in this area of DC, and any competing development risks over-development.
38.	General	Valenti, Cliff	<p>The May 2005 draft contains many contradictions:</p> <ul style="list-style-type: none"> • Section 1-9 says Minority / Low Income populations potentially could be disproportionately affected vs. section 2-17 Low Income and minority populations would not be disproportionately effected. • There may not be sufficient infrastructure to support the additional facilities (1-11) vs. "no direct impacts to water resources" (2-16) and other statements listed throughout (see vii, viii).
39.	General	Valenti, Cliff	Almost all of the Impact Summary shows a negative effect to the existing community:

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			<ul style="list-style-type: none"> • More traffic on roads the draft says are already congested (vii). • Alt 3A/3B and 4 site access would fail (2-20) § North capital St would fail • Removal of mature trees (2-16) • Adverse effects on aquatic life (2-16) • Adverse effects to topography (2-16) • Increase noise level (viii) • Degraded air-quality (viii)(1-11)(2-20) • Decreased green space • Increase in city and federal services (2-17) • Direct, long-term adverse impact on archeological / historical significance (2-19) Says current Lincoln cottage views would be adversely affected, yet the city and federal government have spent allot of money to preserve this historic sight. <p>Only short term interests of developers and profiteers are served by this plan, but the long term interests of Washington DC, residents of Petworth, and residents of the Old Soldiers Home are not represented.</p>
40.	General	Van Wye, Brian	Substantial efforts (e.g.: a set aside of jobs) should be made to ensure that DC residents benefit from job opportunities associated with construction and development
41.	General	Van Wye, Brian	Little effort made to clearly explain alternatives and criteria to evaluate them. Presentation esoteric. Not detailed description of alternative – brochure had too little info – much less than the presentation.
42.	General	Walsh, Deborah	I received a flyer two days ago. Why was I left out? This plan is not designed for the good of the internal or external community. This is about people making

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			money and not about the men in this home needing money.
43.	General	Welch, Suzanne	Transitional Housing Corporation The EIS did not adequately address the housing demands and needs pressing on the District today. Affordable housing is in great demand and need, not embassy housing, hotels or high rise condo. Please consider the enclosed Housing in the Nations Capital 2004 by the Urban Land Institute and Fannie Mae Foundation, where residential uses are considered at least 20% should be affordable for sale or for rent housing for low and moderate income families.
44.	1.1	Cody, Martin	Somewhere in Introduction state what this EIS does not include: 1. No economics of various options and alternatives 2. No input from the “Master Plan” with its goals or alternatives. 3. No priorities are given to various options as benefiting the residents, eg; hospitals, medical schools, cancer research center/clinics are better than residential units (4000 homes/apts) traffic, car parking problems, etc. get last priority to foreign embassies (no value for residents – only money).
45.	1.3	Hafvenstein, Lauri	Just how much money must be raised to support the ongoing requirements of the AFRH?
46.	1.3	Patykewich, Leslie	Share the financial report of AFRH that shows how much revenue is required and how much will be generated with these and other options. Share the projected capacity needs of AFRH (in terms of space and growing numbers of veterans ensuring that quality of life is NOT compromised)
47.	1.3	Swanson, Lisa	Though sensible growth in areas with existing roads, schools and other services is preferable to creating sprawl, we do not need to sacrifice increasingly precious

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			green space, useable by all for recreation and other purposes, to development for unsubstantiated need for income. Until the financial situation is explained the "needs" of this entity are justified, further development that compromises the economic and physical health of the neighboring community cannot proceed.
48.	1.3	Tulchin, Drew	The EIS does not mention, suggest, or provide financial information as to how sale of land and development thereof is really a solution to the economic challenges of the AFRH Master Plan. The first solution of non-sale should explore other revenue generation schemes, including but not limited to: reduction in costs, better budgeting, increasing contributions from enlisted men, fund-raising, and rental of existing resources. Without a sense of the economic need, there is no way to determine if the suggestions truly would be successful or not. Options other than just sale must be explored, as sale is a short term gain, not a long term sustainable solution.
49.	1.3	United States Department of the Interior Office of Environmental Policy and Compliance	In addition, the financial needs of the AFRH that have stimulated this proposal are not quantified. Beyond stating the need for increased funds, there is no indication of how much of the facility must be converted to revenue generating development in order to sustain the facility. Without such information, we believe the master plan lacks a sound basis for decision making.
50.	1.3 and 2.1	Donahue, Kathleen	Alternative 1 is no action but is unlikely to be a viable option. Alternatives 2-4 utilize all of the conceptual development zones and none of the alternatives consider only partial development of the six zones. Not clear why so much development is required because there is no financial information included.

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			The final EIS should have development alternatives that would have less impact on the surrounding area, or a disclaimer about why less development is not financially feasible for AFRH.
51.	1.4	AFRH Master Plan Committee	To understand the “essential components of the AFRH-W” it is necessary to have available a listing of these essential components of the AFRH-W. Question: In detail, what are the essential components?
52.	1.5	Department of the Interior	Section 1.5 Background should acknowledge the importance of the AFRH-W in the history of the design of the City of Washington. It is notable that the setting and planning of the AFRH-W has been of concern and assigned importance for well over one hundred years. The presence of the “Soldiers Home” at the time of the development of the “MacMillan Plan” in 1902 underscores the dependence upon this park-like setting to continue in a vain similar to the parkland of Rock Creek. It appears to have been the status of The Soldiers Home as a continuing stable presence that allowed the area between Rock Creek and the Anacostia River to retain or create few park, open space and recreation areas in Northeast Washington. Portions of the proposed Master Plan suggested for development would severely reduce the contribution that the current facility now makes and should make to the park and open space component of the Nation’s Capital.
53.	1.8	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew	Some important stakeholders were not on your list of individuals and organizations to whom the DEIS was provided. The District of Columbia Department of Parks and Recreation (DPR) was not served with the DEIS. My understanding is that they did not learn of the draft EIS until July 1 inadequate time to properly respond and even then only learned of the DEIS through concerned city residents. The comment period for the DEIS should be extended so that DPR can complete its

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		Pansegrow, David Tufu, Adan and Janet Wahl, Abby	own comprehensive planning process in a way that can consider potential use of part of the AFRH property to meet city park needs. In addition, it is not clear that National Park Service offices with responsibility for the Capital Region actually received notice of the DEIS. Notice of the DEIS was sent to a regional office in Philadelphia, but was not sent to local office responsible for Washington's monumental core or to the superintendent of Rock Creek Parkway.
54.	1.8	Crandall, Bill	The AFRH needs to seriously and substantially incorporate neighborhood concerns into any development plans. Not just lip service, a pat on the head, and checking 'get community input' off the to-do list.
55.	1.8	DC Office of Planning	A major suggestion is that the process for including the District government and the general public, particularly the surrounding neighborhoods, should be clearly outlined and adopted for the entire process. Both the District government and surrounding neighborhoods should be afforded ample opportunity to determine how the programmatic targets for each development scenario and any sufficient alterations are massed on the site and respond to concerns/requirements related to historic preservation, adaptive reuse of existing structures, open space, transportation and economic impacts. It has been the District's experience that community charrettes (workshops) are an effective way to allow residents and other stakeholders to participate and help shape outcomes of planning/development processes.
56.	1.8	Feny, Adrian	As you are aware, there is a number of very active community groups which have weighed in on this proposed development and since the likely footprint is so large, perhaps as large as eight million square feet, it's imperative to continue to not only welcome community input but really to ensure the comments and concerns of those affected are incorporated into the final version of the environmental impact study

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			and ultimately the master plan for the project.
57.	1.8	O'Brien, Bob	I do think it's premature to submit these proposals without residents having had the opportunities to become more familiar with the plans and the effect it will have on their lives here at Armed Forces Retirement Home.
58.	1.8	Patykewich, Leslie	Lastly, contrary to the stated objective of ensuring " <i>an open, participatory process with the AFRH-W residents and the community</i> ", I do not feel that the community was given the sufficient time or information needed to actively participate in this process and question the earnestness of the AFRH's intent to engage the community in this process. Few of us knew of the June 22 meeting and even fewer of any prior steps. I refer to the many written and voiced comments supporting this concern. I would like the AFRH to extend and open this process and would also like to ensure that from here out, the AFRH be more transparent and take more active steps to ensure stakeholder participation. I would also like to ensure that a community representative participate in all meetings and that minutes and updates be shared monthly.
59.	1.8	Patykewich, Leslie	Improve transparency: ensuring community representation and monthly updates. Provide three dimensional mapping of proposal. Describe the EIS process in terms of participation and transparency and conduct a survey of stakeholders to measure their perspective of the process thus far.
60.	1.8	Sullivan, Matthew	I would encourage the AFRH to consider slowing down the pace of proposed development. Once an area is sold and developed, it's gone forever. While I have no problem, per se, with development at AFRH, I would like to see a more thought out process that includes community involvement at all phases.
61.	1.8	Valenti, Cliff	How do the Soldiers feel about this? Every soldier I have talked to either doesn't know about it, or is against it. I am told by long time residents in the neighborhood

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			that the reason public access was closed off at the Old Soldiers Home was because they wanted it to be peaceful and quiet for the soldiers, now we're talking about creating a city within a city? The increase from the Lincoln Cottage is certainly going to make it busier around there, but not to the point that creating this huge development will.
62.	1.8	Van Wye, Brian	Thus far, efforts to engage the community in the process have been inadequate: I read the paper and listen to the radio and walk streets near the AFRH, but I have heard nothing about this proposal until a few weeks ago – despite the fact that Federal Regulation notice appeared in August 2004.
63.	1.8	Williams, Virginia	I'm a resident of Petworth and am a bit concerned that the Soldier's Home development decisions are being made too fast, and with only one public hearing. For what it's worth, here's a recent article in the NY Times that makes the case to proceed slowly, and with care, because 100-year-old trees won't shade our family picnics if they're paved over in a quick effort to make a profit. (article included with copy of comment)
64.	1.9.2	AFRH Master Plan Committee	Chapter 1, page 1-12, Site Landscaping "...depend on decisions by the developer(s) and is beyond the scope of this EIS". Question: Should there be a system in place assuring that any "decision" by the developer maintains the visual esthetics philosophy or concept of the AFRH-W? Note: This question relates to one of the stated objectives of the EIS (page 1-3) "Preserve and improve the essential components of the AFRH-W for the residents and the community.
65.	2.0	Felder, Charles	Since the irretrievable loss of the AFRH-W Historic District, which is eligible for

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	General		listing in the National Register, adversely impacts on all present and future AFRH-W eligible veterans, can modified plans and other sources of income also be investigated through the Master Plan?
66.	2.0 General	Adams, Nathaniel Jr.	Senior Citizens who now tire of caring for their regular houses in DC must now relocate in MD or VA for “senior communities.” Could not some of this property become properties for “senior community” establishment, whereby seniors would purchase or lease reduced-size residences?
67.	2.0 General	Boylan, Kathy	<p>Fund the Old Soldier’s Home by:</p> <ol style="list-style-type: none"> 1. Change the requirements to allow homeless veterans and disabled veterans, their monthly checks would help fund the home. 2. Invite Not for Profit groups serving veterans to take over unused buildings and pay rent. 3. Allow U.S. Park Service to take over land for park. Park Service would then pay for mowing and other land, tree, and pond care. 4. Demand that the Federal Government pay to maintain the Armed Forces Home. 5. Stop the war in Iraq and use the money for funding. 6. Use the home to serve some of the thousands of seriously wounded soldiers returning from Iraq and Afghanistan. Also serve the needs of the many who are returning from war suffering from a mental disorder. 7. Close Walter Reed and use the money for the Soldier’s Home
68.	2.0 General	Byke, Emil	<p>I attended Mr. Cox briefing of the DEIS on June 15. What I perceived is that Mr. Cox’s main issue is how to increase revenue for the Home Trust Fund – I have two simple solutions which would not cost the Fund</p> <ol style="list-style-type: none"> 1. Congress in 1995 passed a bill to increase donations from active duty personnel

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			<p>the sum of fifty cents to one dollar per month – all that needs to be done is to have Dept of Defense order it to be.</p> <p>2. Transfer or lease to the Veterans Administration the King Health Center specifically the LaGarde Building. This building cost the Fund approximately 65% of our operating budget.</p>
69.	2.0 General	Catherine McCarthy	Why so many housing units? Are we to become just another small sub division of DC?
70.	2.0 General	David Douglas	Please, please, be a good steward... keep the green space, we need the OXYGEN!
71.	2.0 General	Edward Strites	Please preserve our Grant Building and have developers include it for their plans. Include opportunities for the able bodied residents to be employable on part-time/full-time basis by the developers/contractors and for future work opportunities after development is over. Provide projects educational/medical/ recreations opportunities to residents to ensure quality of life improvement, enticement thereby.
72.	2.0 General	Friesel, Larry	... there should be more plans to build at least one more dormitory in addition to the Scott and Sheridan buildings.
73.	2.0 General	Friesel, Larry	There has been mention made of a parking garage. I believe, this would be an outstanding addition to concentrated the parking, rather that spread the parking around in different parking areas The location should be at the end of the Sheridan building across the street from the existing security office or location, in the parking area that is now in that location. The parking garage should be a least five stories height and have a least 2 elevators to transport the people using the facility.

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74.	2.0 General	Friesel, Larry	AFRH-W should immediately adjust or change the age minimum criteria to accommodate some from those conflicts and/or actions.
75.	2.0 General	Friesel, Larry	I was in attendance to most of the meetings if not all and it is apparent that everyone has an opinion as to what and how this land is used. Again, the over 150 year historic usage should always be emphasized to the Veterans and not offices and parks that have limited value to the residents.
76.	2.0 General	Friesel, Larry	The Sherman Building – the front of the building has been renovated and restored, but the first 2 floors in the middle of the building has been ignored or left to storage and general deterioration. This building, historically has been built as a dormitory, but is now office space, storage and hobby rooms on the third floor. More and better usage of this building is sorely needed. If funds are available to do the necessary work on the front 3 floors and the relocation of the security offices, then funds should be there for the 2 floors in the middle of the building.
77.	2.0 General	George, Michael R.	Make Areas 3, 4, 5 AFRH-W National Graveyard.
78.	2.0 General	Jones, Timothy	Return to an increased agricultural use of land; studies have shown that the most profitable farms are close to urban centers. A certified USNA organic farm will reduce AFRH costs of operation and generate revenue. Green houses and hydroponics gardens can generate year round revenue stream. Fresh Fruits and vegetable can be made available to Washington Hospital complex. Additional fish farming can be source of funds as well.
79.	2.0 General	Josephine Soboleski	Security Safety

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			Serenity For such a “vast” undertaking – are these truly a part of the “master plan?” I hope so.
80.	2.0 General	McLaughlin, Amy	Please re-work your plan to consider a park, running/biking path and green spaces that would be accessible to neighbors. I would be willing to pay an annual fee to have access to this land as I am sure others would. This could be a potential source of revenue.
81.	2.0 General	Michael Longwell	The one solution to solving the AFRH financial problems was not addressed. This solution would raise the \$.50 a month deduction form active duty military (enlisted and warrants) to \$1.50 (\$1.00 is already authorized but not implemented). This solution would generate an additional \$14 million per fiscal year exceeding by \$3 million in any of the proposed plans. This solution (a very viable and realistic one) would generate more revenue without leasing or selling of any land. This solution would be paid for by the very service members who on day may be living here. It makes a lot of common sense. This is a realistic solution not a political one.
82.	2.0 General	Patricia McClinton	I am against #6, put in near North Capitol Street.
83.	2.0 General	Van Wye, Brian	Public parks and green spaces must be a part of this plan if AFRH expects community support. Walkways across the property (E-W) should be incorporated
84.	2.0 General	Van Wye, Brian	Retail should be part of the final design on both east and west sides of AFRH
85.	2.0/General	Adams, N.M. Jr	Instead of new construction for "condos," why not utilize existing vacant dormitory building and greatly "under-used" dormitories. Contracts could be awarded to reduce each building to bare walls and floors; followed by subsequent complete

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			<p>"up-scale" re-furbishment to the maximum levels attainable (both interior and exterior). Once down, such apartments could be sold at the highest "market-rates" which are now prevalent. Such an effort would result in the large income levels which you are seeking and should be compatible with the neighborhood complaints.</p>
86.	2.0/General	AFRH Master Plan Committee	<p>All eight character areas obscure historic views and open spaces from within the AFRH-W. The sequestered golf course is almost the only open space and cannot be seen from off the compound.</p> <p>What are the possible ways to consider expanding the open space areas within the EIS span of control?</p>
87.	2.0/General	AFRH Master Plan Committee	<p>After scoping, might modified alternative plans be formulated to develop fewer zones, in the event that overall adverse effects of developing all zones are too severe?</p>
88.	2.0/General	AFRH Master Plan Committee	<p>The golf course driving range is considered an essential component of a golf course. Will the golf driving range be maintained or relocated? If relocated, where?</p>
89.	2.0/General	AFRH Master Plan Committee	<p>The uniquely strategic location of the AFRH-W on secure government property serves as a military and Homeland Security vantage point as a point of protection for the Capital of the United States. The property has been used in the past to station defensive equipment and materials and serve as a landing and staging area. What has been the response of the appropriate Defense Department agencies to the potential loss of the ability to use the AFRH-W for purposes of national defense?</p>
90.	2.0/General	AFRH Master Plan Committee	<p>Is there any construction, improvements, modifications, etc. contemplated or contained within the Master Plan for any area not currently designated within a zone?</p>

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			<p>Note: There is no mention in the document relating to the environmental impact on any of these areas.</p> <p>Example: Part of the golf course is within Zone 4. To maintain the credibility of a golf course requires a minimum of nine holes. If the credibility of the course is to be retained, where will the two dislocated holes be moved and what will be the environmental impact of this construction?</p>
91.	2.0/General	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	Retention of all of the existing mature trees in the historic character areas are particularly essential for historic-preservation purposes. All development alternatives must be crafted in such a way as to preserve the mature trees.
92.	2.0/General	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew	Other true alternatives to the proposed development plan must be explored. The four "alternatives" listed in the DEIS are not really different from one another, but merely slight variations on a single theme. More effort should be made to provide true alternatives with a variety of financial and real estate options to solve the underlying concern namely the budget of the AFRH.

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		Pansegrow, David Tufu, Adan and Janet Wahl, Abby Stephens, Arlus J.	
93.	2.0/General	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	<p>The location of a park in Zone 6 in the AFRH EIS would be easily accessible to dense development in neighboring Colombia Heights and to planned dense residential development along Georgia Avenue, as well as dense development planned for the rest of the AFRH site. In addition, because of proximity to the Georgia/Petworth Metro stop, it would provide much needed parkland for other parts of northwest and northeast D.C.</p> <p>Among the alternatives, the DEIS has not considered alternatives that would provide significant parkland for the neighborhood to the west of AFRH. As the name Park View suggests, the neighborhoods of Petworth and Park View adjacent to the western boundary of Soldier's Home were developed in the early 1900s around the presence of the Soldier's Home as open space.</p>
94.	2.0/General	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew	<p>For parcels, or portions of parcels, which have historic significance or character, the development plan must spare them from development, possibly including through alternatives such as land trusts or sale of certain parcels, or portions, for use a parkland. Both options should be added as viable alternatives that allow for revenue but also conservation.</p>

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		Pansegrow, David Tufu, Adan and Janet Wahl, Abby Stephens, Arlus J.	
95.	2.0/General	Brown, Rebecca	I strongly feel that there are alternatives not yet considered for receiving the finances needed. Other than acquiring funds directly from the US Congress, there are options for retaining greenspace. Please see the http://www.lta.org/conserv/options.htm for information on conservation easements.
96.	2.0/General	Brown, Rebecca	I am extremely supportive of opening the property for access to the community. The fences and barbed wire around the land is not only unfriendly and eyesore, it fosters neighborhood discontent. To have this land so close but inaccessible is a huge disservice to the community. Community gardens, playgrounds and walking trails would increase the goodwill between the neighbors and the AFRH.
97.	2.0/General	Brown, Rebecca	If development is indeed needed, I would welcome environmentally friendly green buildings with thoughtfulness of the viewsheds and keeping as much open space as possible.
98.	2.0/General	Carstensen, James	We examined the plan for this land drawn up by a few executives and consultants. We don't see anything in the document that talks about national parks. We don't see anything in reference to recreational trails or recreational areas or even parks for the performing arts like the Virginia's Wolf Trap or Chicago's Ravinia. We don't see the talk of the need to preserve open space for the retired soldiers, the entire community of Washington, and the nation.

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99.	2.0/General	Crandall, Bill	Any development should strive to preserve a reasonable amount of managed green space that is accessible to the public.
100.	2.0/General	District of Columbia Historic Preservation Office	Despite the bulk proposed, the proposed uses and the general development zone locations are likely workable. But the fact that the EIS alternatives range from a no-build option to options in excess of six million square feet of new construction suggests that there are alternatives in between – and consideration of all alternatives to avoid or minimize adverse effects is the intent of Section 106.
101.	2.0/General	George, Michael	I'm a home resident and I'm against getting rid of our land. They tell us it's for the trust fund. Nobody ever sees this trust fund. If they want to do something with the land make a national cemetery out of it. If they got to take it from us make it a cemetery for the Soldiers Home. They're running out of cemeteries. That will work.
102.	2.0/General	Glance, Jason Kenngott, Christine McGilvray, Andrew	The AFRH needs money, but the Washington DC campus is not operating at full capacity. In order to rectify this, the current residents of the AFRH in Gulfport should be relocated to Washington and the entire Gulfport campus should be sold for development. The historical and environmental value of the Washington DC campus clearly makes it the asset to preserve. The historical value of the Gulfport campus is negligible, but its commercial value is great ("The Mississippi Gulf Coast region boasts some of the finest beaches, fishing, casinos, restaurants, resorts, entertainment, shopping, and championship golf courses in the southeast United States." -- AFRH web site). Liquidation of the Gulfport campus should therefore yield considerable revenue.
103.	2.0/General	Hafvenstein, Lauri	Any plan to alter the Armed Forces Retirement home property must include a provision to preserve the natural beauty and restful, restorative nature of the

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			landscape and its views. This is, according to the Deputy General Counsel for the National Trust for Historic Preservation “integral to the Monument’s historic context and interpretation”.
104.	2.0/General	Hafvenstein, Lauri	Long-time residents here talk of anticipating the progress of the gardens tended by residents of the AFRH each summer, a ritual that dates back some 150 years. Sadly, it is all too easy to imagine how different the neighborhood will be if those historic gardens are replaced by high-rise buildings.
105.	2.0/General	Hafvenstein, Lauri	Why are there only two alternatives—no development or large-scale development with buildings up to eight stories completely surrounding the periphery of the property?
106.	2.0/General	Hafvenstein, Lauri	Has there been any exploration of alternatives, such as a land swap or partial development of areas that are less historically significant?
107.	2.0/General	Hafvenstein, Lauri	Has there been any consideration given to opening some of the property to public access for parks and recreation?
108.	2.0/General	Hamilton, Heather B.	I am extremely disturbed that there is no plan to preserve community green space. Any community development, particularly when it is getting rid of what little green space we have in our community, should be mandated to maintain at least 10% of the space as parkland accessible to the community. It's bad enough that the children at Park View Elementary, a few blocks south, have only a concrete lot to play in; it would be a travesty if the children of the neighborhood were not provided with a real park when it would be so easy to maintain some of the lovely trees and open space.
109.	2.0/General	Hoffman, Sandra	Among the alternatives that are considered, like prior speakers, I'd like to urge the Armed Forces Retirement Home to work with the DC government and federal

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			government to find alternatives for funding or for land use including possibly exchanges of land with other federal agencies where perhaps you can find a site that would be more appropriate for development and then perhaps this can become a park. Maybe that's a way to work things out.
110.	2.0/General	Kenngott, Christine	Option 1, do nothing, would be my choice. But since that is not financially viable, there should be an option that provides something for the community. There should be a park or public green space for people, not just 100% development for maximum profit. These plans do not take into consideration the local community, but are designed to benefit outside developers most.
111.	2.0/General	McFadden, Marion Mollegen	I request that the development contain a large green space buffer zone between the edge of the property and any housing, commercial, or embassy buildings. Since the neighborhood has no other parks (other than the small Parkview baseball field at Princeton and Warder), the view is precious. However, the large iron gate separating the AFRH from the neighborhood has always been a source of frustration; we can see the beautiful grounds, but only through bars. My mother used to tell stories of family picnics at the Old Soldiers Home in the 1940s. While I realize that the park grounds will not be wholly opened to the public, I believe the development creates a positive opportunity for permitting the local community to better enjoy the campus. By creating open space accessible to the public between Park Place Northwest and the development, down past the duck pond, the project could accomplish its financial goals while buffering the noise and traffic dangers and adding sorely needed, accessible greenspace.
112.	2.0/General	MedStar/ Washington Hospital Center	This City has limited large tracts of land for development. When large parcels become available for use, a variety of possibilities should be considered that maximize the benefits to the community, both financially and substantively.

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			Because of the character of the land use south of Irving, medical, education, research, and other related institutional uses should be considered.
113.	2.0/General	Murphy, J. Dahl	Think our congress and lawmakers should support our retired troops. That the AFRH is low on money is inconceivable. Suggest congress put the home's support in the US yearly budget. Do not support development of any part of the home and therefore want alternative #1 to take affect. Do not touch this historic site for the gains of developers and real estate moguls.
114.	2.0/General	National Trust for Historic Preservation	The National Trust is particularly concerned about the limited range of alternatives explored in the DEIS. Because of the potential impacts that would occur as a result of the high level of development currently proposed in the DEIS alternatives, we strongly urge the AFRH to develop additional alternatives that would involve less construction in order to reduce the adverse impacts on historic resources, as required by 36 C.F.R. §§ 800.6(a) and 800.1(a). For example, using Figure 4-1 as a starting point, DEIS at 4-37, we recommend developing alternatives that would reduce the overlap between Development Zones and Intact Character Areas.
115.	2.0/General	O'Brien, Bob	We seem to have four proposals on the agenda, all of which have been developed with little or no input by the residents. As I see it, this meeting and the previous one on the same subject only summarize the proposals being submitted to EPA. At the first meeting I attempted to have it clarified as to which proposal the administration was favoring or was more in favor of than others. I was not successful on that. But I find it difficult to believe that they do not have a distinct opinion about which of these plans should be the one to be accepted.
116.	2.0/General	Patykewich, Leslie	Consider and address additional options: non development, more conservative development options and combinations of several development and nondevelopment options

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117.	2.0/General	Quick, George	<p>The suggested plan to destroy the Home is ridiculous. The proposed purpose of the plan is to raise money to pump up the AFRH fund. This is neither desirable nor necessary. There would be no shortage of funds if non-disabled veterans were no longer accepted as residents. There would be no shortage of funds if a reasonable users fee were assessed each resident.</p>
118.	2.0/General	Swanson, Lisa	<p>While the draft EIS appears to consider a range of options for the effects of developing spaces on the AFRH-W, the potential development options proposed to generate revenue does not include the potential of opening this middle-city green space to the public without further extensive development.</p> <p>The current AFRH-W website proudly promotes "a city within a city" with amenities that the Petworth, Park View and other adjacent neighborhoods have been lacking for years: an auditorium for films and live entertainment, a golf course and driving range, stocked fish ponds, community garden space, a bar and restaurant or space for a large catered event, a bowling alley, craft studios, magnificent and modest buildings of historical interest, and superb vistas within a landscape relatively untouched for almost two centuries.</p> <p>With sound management and promotion, by opening access gates to the public, all of these amenities could provide additional commercial and recreational resources for the surrounding residential neighborhoods, apart from the larger-scale development planned at Georgia Avenue/New Hampshire Avenue, with none of the short- or long-term adverse effects.</p>
119.	2.0/General	Taylor, Joseph	<p>Recommendations: Sell off the Le Guard Medical Facility. Drop the 60 year old age limit. Level fees so that all Residents pay the same. Reduce medical staff. Cut the current staff level even more. Many residents would rent space for storage and we have lots of empty space.</p>

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120.	2.0/General	The Potomac Conservancy	Creating an urban parkland would offer residents and the public a respite from the congestion of the metropolitan area. The unique historical nature of AFRH-W and its monuments would draw citizens to the area. The federal land converted to open space would then be available to the general public. The residents of AFRH-W would also receive physical and mental benefits by use of the open space. The retention of open space would also maintain the scenic viewsheds of the historical buildings and the greenspace for the residents and neighbors. Organizations abound who can aid AFRH-W in creating an urban park.
121.	2.0/General	The Potomac Conservancy	The Potomac Conservancy recommends consideration of additional alternatives that incorporated a mix of uses, public open space, and historic preservation. The Potomac Conservancy advocated a mixed-use development that provides some community open space, particularly saving the community garden. This proposal would mitigate the environmental impacts from the DEIS alternatives.
122.	2.0/General	The Potomac Conservancy	The sale of the land to developers would be a quick fix to a long-term problem. The sale is a one-time event and may not solve AFRH-W's financial difficulties. A more sustainable long-term solution needs to be addressed. The environment, cultural, and historic negative impacts resulting from development of the land outweigh the sale and the resulting cash inflow to AFRH-W.
123.	2.0/General	Tubman, Michael	Nor does the draft EIS afford any opportunities for greater public access to green areas. On p. 3-17, the draft EIS identifies the need for more public parks and green spaces as part of the land use plan of The Comprehensive Plan for the National Capital. Later, on p. 4-23, the draft EIS concludes that Master Plan Alternatives would "conserve open space on the site," but it does not include any opportunity for

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			public access to this open space. On p. 4-38, the draft EIS acknowledges that the use of the Soldier Home as public parkland is compatible with the traditional residential neighborhoods surrounding it. I would feel more comfortable supporting any of the Master Plan Alternatives if some public access was given to the existing green areas within the Soldiers Home property, thereby making the Master Plan Alternatives consistent with the stated goals of the Comprehensive Plan.
124.	2.0/General	Valenti, Cliff	Other alternatives to generating revenue for the Old Soldiers Home need to be discussed. Our Federal Government has the responsibility to make sure our soldiers are adequately funded in their retirement. Giving up their gardens and green space or their prescription drugs should not even be an issue. Granted, this proposal is the easiest out for the financial woes of the AFRH, but it's a band-aid.
125.	2.1	AFRH Master Plan Committee	Chapter 2, page 2-3, figure 2-1 Why is the Sheridan Building included in Development Zone 1?
126.	2.1	AFRH Master Plan Committee	Chapter 2, page 2-4, Zone 1 Zone 1 is designated for institutional uses compatible with the AFRH-W operations.... In detail, please define and explain the institutional uses?
127.	2.1	District of Columbia Department of Housing and Community Development	Dense new institutional and commercial uses that generate a great deal of traffic should be concentrated and focused in Development Zone 3 established in the Master Plan. North Capitol Street and the existing North Capitol Street entrance have more capacity to be able to accommodate the traffic that these new institutional/commercial uses will generate. Development of proposed new medical uses should be concentrated on the

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			Development Zone 4 located on Irving Street directly adjacent to the existing hospital complexes located south of Irving Street NW. Traffic generated from these new medical uses should enter at a new entrance located at the existing First Street and Irving Street intersection that currently serves traffic from the hospital complexes south of Irving Street.
128.	2.1.2	Hamilton, Heather B.	I strongly oppose the proposal for retail shops on parcel 6. Retail shops will only make the streets between the developed parcel and Georgia Avenue a corridor for additional foot and automobile traffic, and therefore drug traffic, which will increase the violence level in our already-violent neighborhood. By the time that the new development is completed, the shops at the Georgia Avenue metro, only 3 blocks away, will have been completed. There is no need to add additional retail.
129.	2.1.2 and 2.1.3	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby Stephens, Arlus J.	The DEIS mentions any project being in keeping with the neighborhood, but that standard does not actually appear to be consistently applied in the document. That error must be corrected. For example, alternatives 2 and 3A suggest development in Zone 6 that is not at all in keeping with the adjacent neighborhood's architecture. The existing neighborhood is comprised entirely of rowhouse architecture, with a maximum of three stories in height.
130.	2.1.2 and	Brown, Rebecca	I am thoroughly against more medical buildings in zone 5. It would add no needed

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	2.1.3		services to the immediate residential community.
131.	2.1.2, 2.1.3, 2.1.4	District of Columbia Department of Housing and Community Development	Residential uses of a scale compatible with the low-rise townhouse development in the adjacent Park Place and Petworth neighborhoods should be located in the Development Zones 5 and 6 identified in the Master Plan. The existing Park Place and Rock Creek Church road streets are both rather narrow and small scale streets. The traffic generated by new townhouse scale residential development can be more easily handled on Park Place and Rock Creek Church road as they are presently configured.
132.	2.1.2, 2.1.3, 2.1.4	District of Columbia Department of Housing and Community Development	Particular attention should be paid to the details of the residential developments to be constructed around (to the north and south of) the two large fishing ponds located at Park Place and Irving in the southwest corner of the Campus. These two ponds have some of the most intact undisturbed landscaping on the entire AFRH Campus. The existing landscaped character of these ponds should be respected and preserved to the maximum extent possible by the new residential developments that will be built next to them.
133.	2.1.2, 2.1.3, and 2.1.4	Brown, Rebecca	If new residences are added, I would strongly advocate for them to be built with a similar design to the current character of the neighborhood and to include some low-impact commerce. While Georgia Avenue is slated for improvement, currently there are few services (shops, restaurants, etc) in the area.
134.	2.1.2, 2.1.3, and 2.1.4	Carstensen, James	Simply stated - I am opposed to any and all additional development of zone 6 along Park Place, NW in the AFRH proposal. Any additional development should be conducted at the already developed areas along North Capitol Street and Michigan Avenue.
135.	2.1.2, 2.1.3, and 2.1.4	Department of the Interior	The Department believes there is a need to develop an alternative that specifically address the park and open space value and contribution to the City as a whole. In

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			<p>our judgment, the areas identified as 5 and 6 should be considered critical 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 for embassies would excessively hem in the current and further use of the golf course and ponds to a point that their future would be threatened. We recommend that a new alternative be developed which would create a public park including the golf course. In order to relieve AFRH-W from the maintenance costs, consideration should also be given to transferring the new park to the District of Columbia or the National Park Service for management.</p>
136.	2.1.2, 2.1.3, and 2.1.4	Hamilton, Heather B.	<p>Any residential or institutional/embassy development should be required to provide parking for each resident/employee.</p>
137.	2.1.2, 2.1.3, and 2.1.4	McFadden, Marion Mollegen	<p>Also, unlike some of my neighbors, I request that if any housing is created, the AFRH require that at least 15% of the units be affordable to low- to moderate-income families. The rapid gentrification of Parkview and Petworth have priced out many potential buyers and renters who grew up in the area and would like homes of their own. I request that preference for these units be given to long term DC residents.</p>
138.	2.1.2, 2.1.3, and 2.1.4	Tubman, Michael	<p>In many of the alternatives (2,3A, 4), the EIS proposes to use zone 6 for residential development with some retail space as well. In Alternative 2, the EIS refers to areas "compatible with the residential development west of Rock Creek Church Road." It should be noted that compatibility with the surrounding neighborhoods would require open streets. Gated neighborhoods would not be compatible with the existing openness and community atmosphere of the surrounding Park View and Petworth neighborhoods. Moreover, current residents should have access to any</p>

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			new retail developments.
139.	2.1.3	Friesel, Larry	Proposal #3B seems to be the best alternative in my opinion. The historic use of this land for more than 150 years should be persevered, and of the utmost thought in changes or planning for the land.
140.	2.1.3	NCPC	With this primary objective in mind, the Commission staff review of the DEIS finds either alternative 3A or 3B appear to best achieve that objective while still maintaining significant and important qualities of the existing facility campus
141.	2.1.3	Tubman, Michael	Alternative 3B also holds potential in its suggestion for the development of an embassy in zone 6. This could be a positive addition to the neighborhood, offering the neighborhood prestige and potential commercial customers of local shops. However, p. 4-22 recognizes a need for increased police presence only in the event of demonstrations. The FEIS should recognize that foreign missions would require a greater constant police presence both at the site and in the surrounding neighborhood.
142.	2.1.3	Valenti, Cliff	Every option, except the "no action" option, is huge in scale, even 3B, which shouldn't even be on the table since the State Department has clearly stated they have no interest in putting Embassies and such at the sight.
143.	2.2	Patykewich, Leslie	I am particularly concerned that the financing alternatives eliminated from the detailed study (section 2.2, p. 2-15) were not given full consideration and I am requesting that they be revisited. In addition, I would also like to encourage the Armed Forces Retirement Home to examine other options that may yet to have been considered. Among those mentioned at the June 22 meeting were: requesting U.S. Congress to create a line item and support for recurrent funding; examining opportunities to exchange land with the DC government; environmental easements;

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			establishing a land trust, etc.
144.	2.2	The Potomac Conservancy	The Potomac Conservancy strongly suggests that the AFRH-W consider other alternatives to the sale or lease of the land to developers in order to create a more long-term, environmentally-sound, sustainable solution to the economic difficulties. We question why other alternatives to land development are not seriously analyzed in the DEIS, instead of merely being included in a quick paragraph mentioning other suggested sources of income. These alternatives do not appear to be fully analyzed.
145.	2.3	AFRH Master Plan Committee	Chapter 2, page 2-18, Economy, Employment, and Income Under the column master Plan Alternatives, the first paragraph appears to be in error. Question: If this paragraph is not in error, what is the rationale supporting the statement?
146.	2.3	AFRH Master Plan Committee	Chapter 2, page 2-19, Historic Properties Under the heading Master plan Alternatives, the indication is that the alternatives 2 through 4 will have direct long term adverse impacts. The properties and structures contained within the confines of the AFRH-W have a broad and resonating effect on and from the military customs, traditions and culture. Question: What specific reuse is planned within the Master Plan? What mitigation measures are possible to preserve the historic culture of the AFRH-W for future military generations?
147.	2.3	AFRH Master Plan Committee	Chapter 2, page 2-20, Air Quality Under the Master Plan alternatives discuss causes of both long term and short term adverse impacts to air quality.

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			<p>What mitigating measures and/or contingency plans are in place to cope with AFRH-W residents who currently have respiratory problems? What system will be in place to measure the net result of this adverse impact on the incidences of respiratory ailments (i.e. COPD) on AFRH-W residents?</p>
148.	3.1.1	Arguto, William EPA	<p>Page 3-35, Character Area 5: Pasture, states that “The Pasture represents the natural agricultural landscape that was once vitally important to the self-sustaining farming activities on the site and illustrates the 19th century pastoral appearance of its once active farming lands.” Prime and unique farmland impacted by the project should be delineated regardless of the current state of cultivation. These efforts should be coordinated with the National Resources Conservation Service. Impacts to prime and unique farmland should be avoided. However, if this is not possible, the Final EIS should explain the implications of developing the prime and unique agricultural land with respect to the Farmland Protection Policy Act as well as describe the mitigation measures for those impacts.</p>
149.	3.1.2	Arguto, William EPA	<p>Page 3-3 of the Wetlands Section states that the largest drainage area on the AFRH-W, approximately 105 acres, drains into two ponds in the southwest corner of the site via a paved flume. The second largest drainage area, approximately 65 acres, flows north to south through the center of the campus via a paved flume and storm sewers. “Prior to any disturbance of these areas, a Jurisdictional Determination (JD) from the USACE would be needed to determine if these features are considered waters of the U.S. and therefore under the USACE’s jurisdiction.”</p>
150.	3.1.3	Arguto, William EPA	<p>The DEIS states that portions of forested areas, mature trees, and meadow habitats would be replaced with developed areas. The Final EIS should provide a complete description of the terrestrial habitat resources in the study area. Complete species lists for mammals, birds, amphibians, reptiles, and plants present in the study area</p>

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			<p>should be provided. The composition and characteristics of each community type should be summarized and the functions and total acreage indicated. In addition, the species should be mapped relative to habitat locations and species density.</p>
151.	3.1.3	Arguto, William EPA	<p>Although it was noted on page 3-7 that crappie, bass, and catfish are species found in the two fishing ponds, the fish and benthic invertebrates in the ponds within the study area should be surveyed. An analysis of both fish and benthic communities should be conducted to determine the quality and function of the aquatic biota. The purpose of the survey is: 1) to detect impairment of aquatic biota, 2) to assess the relative severity of the impairment, 3) to prioritize sites for more intensive evaluations, and 4) to define baseline conditions and documenting recovery from impairment following mitigation actions.</p> <p>The loss of forested areas and open spaces combined with an increase in impervious surfaces lends itself to more pollutants entering the ponds. Reduced nutrients to streams, affects food supply for fish, etc. Therefore, specific mitigation measures must be outlined to alleviate adverse effects to the aquatic biota present in the ponds.</p>
152.	3.2.1	AFRH Master Plan Committee	<p>Chapter 3, page 3-11, Table 3-2</p> <p>On page 3-9 first paragraph “The AFRH-W is located within Census Tract 23.02”</p> <p>There should be sufficient demographic data available at AFRH-W to treat the population as a separate entity for the purposes of this study.</p> <p>(1) How would the same data (i.e. Population, Race, Median Household Income, Poverty Status) appear if AFRH-W was displayed separately as a separate column to facilitate a closer observation of the population most affected by the proposed Master Plan? (2) Why were the Social Characteristics and Economic</p>

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			<p>Characteristics not included as a distinct table for tract 23.02 (and separately for the AFRH-W to provide a more complete and accurate picture of the population most affected by the proposed Master Plan?</p>
<p>153. 6.</p>	<p>3.2.1 and 4.2.1</p>	<p>Felder, Charles</p>	<p>Why under the EIS, are the residents of the AFRH-W not considered a distinct, unique and viable population affected by all environmental issues; or as a local community; or as a minority population to be considered under Executive order #12898?</p>
<p>154. 7.</p>	<p>3.3</p>	<p>Arguto, William EPA</p>	<p>As indicated in the DEIS, the AFRH-W is a National Register-Eligible Historic District. The master plan alternatives would have direct, long-term, major, adverse impacts to cultural resources and the historic district. The pristine areas that characterize the AFRH-W area and that are associated with and represent historical significance will be lost due to the proposed development. Additionally, new construction would likely alter the historic context of individual buildings and building groups. Cultural landscape features would be disrupted or lost entirely. In addition, the proposed alternatives could potentially affect historic properties outside of the AFRH-W. The historic properties outside of the AFRH-W are discussed within the DEIS. However, a map depicting their location in relation to the AFRH-W would be helpful in determining their proximity to cultural resources within the AFRH-W site.</p> <p>Although a Programmatic Agreement is being developed that will identify mitigation measures as well as design guidelines for the defined character areas, the loss of cultural areas is great and permanent. The DEIS does not propose scaling down the proposed developed areas to retain some (or all) of the intact character areas nor to preserve the open space/meadows or the historic cultural landscape. Thus, of the alternatives proposed, there is no significant difference in the degree of</p>

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			impact.
155.	3.3.3	Larson, Michael Maready, Gerald	<p>The Area of Potential Effect as presented in the DEIS appears to be too small to adequately determine the effect of the proposed master plan upon the National Register listed and eligible sites in the vicinity. The methodology used to determine the boundaries of the APE is neither described nor justified in the text of the DEIS. The boundaries of the APE should be expanded to include all of Petworth, and a new determination of effect should be prepared to reflect the expanded APE.</p> <p>In order for the public to fully understand the implications of the proposed master plan, the full text of the <i>AFRH-W Resource Identification and Evaluation</i> should be included in the text of the Final EIS, in one of the appendices at the very least.</p>
156.	3.6	AFRH Master Plan Committee	<p>Chapter 3, page 3-52, 53, Noise - The last paragraph describes the “land uses near the AFRH” as Category B. Category B is described as “moderately sensitive land uses, including residents, churches and hospitals”. This EIS has given no consideration to the environmental consequences on the specific AFRH-W population whose average age is 77 years and who reside in assisted care and long term care nursing home environment.</p> <p>What would be the Noise Level Results (Table 3-10) if the area within the apartments of the AFRH-W were designated as Activity Category A rather than Category B which is the current category assignment for the “land uses near the AFRH-W”?</p>
157.	3.8	DC Office of Planning	<p>AFRH-W has considerable issues with regard to hazardous waste and corollary contamination. First and foremost, the AFRH-W currently does not have an operations and maintenance (O & M) program in place to manage wastes and other environmental contaminants. Secondly, it is not currently identified as a RCRA</p>

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			<p>hazardous waste generator in the draft EIS even though EHA has it <i>listed</i> with an EPA ID number.</p> <p>Furthermore, the following contaminants or areas of concern have been identified with the past and current operation of the AFRH-W:</p> <ul style="list-style-type: none"> - 3 out of service USTs (underground storage tanks) - 3 abandoned USTs near Buildings 46 and 76 - 3 active USTs associated with Buildings 52, 56, and 64 storing diesel fuel for emergency generators - Possible perchchloroethylene ground contamination associated with former laundry in Building 46 - Former hazardous materials/petroleum use areas in Buildings 73, 76, and 77 - Surplus pesticides stored in Building 77. Conceivably, DDT and chlordane could be housed there given the age of the units - Spent solvents, paint thinners, paint waste, drummed lead paint debris, possible hydraulic fluid - <u>Known</u> asbestos containing materials (ACM) throughout the facility <p>It is also a distant possibility that, given the opening date of the facility (1851), there could be some ordnance issues. Although AFRH-W is neither a fort, nor lies in the "circle of forts" area that comprise much of the formerly-used defense sites (FUDS), it may still be possible to unearth munitions during any required excavations in addition to medical waste and attendant equipment/supplies/bottles, etc. given its pre- and post-Civil war status. As a result, we recommend that an anecdotal review of requisite documents, photographs, etc. be conducted should a</p>

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			light or heavy geophysical study be contemplated for any ordnance/medical waste debris, etc
158.	4.0 General	Carpenter, Gracie	<p>Not one of the proposed alternatives will have a “minor” impact on this area. All changes will be very “major” in affecting AFRH-W, being permanent. Traffic into and out of AFRH-W will increase tremendously. I don’t believe any roads surrounding AFRH-W can carry the additional cars, i.e., quantity, size, frequency. Sound level testing was not done near the Sheridan Building because of ongoing road work on N. Capitol Street. I think it still needs to be done because even once construction begins on hopefully a parking garage for AFRH-W, the noise level will still be high for those of us who live on that side of AFRH-W. A sound barrier of some sort would be on order. But instead of constructing concrete, perhaps tree around the perimeter would work towards reducing noise levels, be aesthetically pleasing to look at, and would also help in making air quality better. Soil erosion is a concern. With the shallow tree root system here, care needs to be taken to perhaps replant trees with stronger root systems, ones that won’t blow over with the first strong winds. Forested areas should only be removed minimally. We have fox and deer on the grounds also. Please leave some areas undisturbed.</p>
159.	4.0 General	Cody, Martin	Add: Section on “Resident Impact” from reduced walking area, grass, flowers, garden elimination, and construction dust, noise of equipment, traffic, CO2, etc.
160.	4.0/General	AFRH Master Plan Committee	<p>The discussion under the various subheadings within Chapter 4 presents a multitude of mitigation measures.</p> <p>Will the mitigation measures presented in the final copy of the EIS be a required part of any contract entered into with a developer to construct any or all of the planned development zone sites under the Master Plan?</p>

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			Will the mitigation measures presented in the final copy of the EIS be a required part of the final copy of the Master Plan for the AFRH-W?
161.	4.0/General	AFRH Master Plan Committee	<p>Chapter 4, page 4-19 first paragraph</p> <p>Under the alternatives, there is a potential increase in population to approximately 7,500 persons.</p> <p>With this extreme in population, as well as the interim increase in the worker population during any construction period, what specific security measures are to be taken to protect the environment?</p>
162.	4.0/General	AFRH Master Plan Committee	<p>“Cumulative Impact” is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Question: Will the final copy of the EUS address the issue of cumulative impact of the Master Plan on the immediate confines of the AFRH-W community?</p>
163.	4.0/General	AFRH Master Plan Committee	<p>Question: What specific base line data will be used or established against which to measure effects of any cumulative impact on the immediate environment and the cultural impact on the resident community?</p>
164.	4.0/General	AFRH Master Plan Committee	<p>When economic, social and natural or physical environments are interrelated then the EIS will discuss all these effects on the human environment. The Master Plan will definitely have an impact on the human environment within the AFRH-W.</p> <p>In what section of the EIS will the Cultural Impact Assessment be completed and included as a part of the final copy of the EIS? What will be the specific measures</p>

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			included within the EIS to evaluate the cultural impact within the AFRH-W resident community?
165.	4.0/General	AFRH Master Plan Committee	What initiatives are in place or planned to control visitor access to the AFRH-W grounds?
166.	4.0/General	DC Office of Planning	The impact of future development on surrounding neighborhoods and District facilities is of utmost concern. Cumulative impacts of all proposed development on the surrounding area should be adequately addressed. Impact analyses should be conducted for transportation, traffic, transit and parking networks, as well as libraries, schools, recreation centers and other services.
167.	4.0/General	Meredith Lathbury Potomac Conservancy	The Potomac Conservancy recommends, in any case, that mitigation and conservation efforts be implemented to preserve the environmental integrity of the area. In order to mitigate the environmental impacts of the current and proposed development, modern techniques need to be implemented. For example, reduction of impervious surfaces will decrease the amount of polluted runoff. In addition, incorporating rain gardens will filter the polluted runoff from current impervious surfaces which will then help to protect the quality of the fish ponds and channeled streams. Retention of mature trees will improve air quality and protect local fauna. (And also be consistent with National Capitol Planning commission's program to protect older growth trees and overall vegetation). Reducing fertilizer and pesticides and only adding these chemical at certain times on the golf course will ensure increased water quality. The utilization of green building techniques such as green rooftops will help mitigate other negative effects occurring from development. In general, there are an abundance of common sense, environmentally-sound methods to be implemented in order to ensure the natural integrity of AFRH-W. Creating a model environmentally-healthy redevelopment

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			will demonstrate what a sustainable, low-impact, in-fill development can be.
168.	4.0/General	Patykewich, Leslie	Environment: It does not appear that the draft EIS sufficiently considered either green development approaches or the cumulative effect of the AFRH development and the already approved nearby development on the community and broader environment. It also appears that traffic and air quality impact were underestimated.
169.	4.0/General	Stephens, Arlus J.	Both residents of the AFRH and neighbors who live to the west of the Home benefit, much as President Lincoln did when he lived in the Anderson cottage, from the relative calm and quiet provided by the green campus of the Home. The EIS notes that the noise level in the area is that usually found in parks. Area residents enjoy being able to walk past the property and to see its green expanses when looking out their windows or down their streets. In this way, the AFRH has provided area residents with a real source of wealth that improves their quality of life in ways that they could not purchase no matter what their income was. This neighborhood does not seem poor to its residents no matter their income because it does not look like a poor neighborhood. The increased traffic, noise, and loss of green beauty and calm will take away something of irreplaceable value in their lives.
170.	4.0/General	Swanson, Lisa	The EIS does not consider the cumulative effects of slated development at Georgia Avenue/New Hampshire Avenue or the potential development of the Macmillan Sand Filtration site.
171.	4.0/General	Swanson, Lisa	Other statements have addressed the changing but overwhelmingly residential characteristics of the immediate neighborhood. For the purposes of any development within the District of Columbia, the environmental impact

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			<p>considerations must include not only the perimeter neighborhoods, but also the Anacostia and Potomac rivers and the Chesapeake Bay.</p>
172.	4.0/General	Swanson, Lisa	<p>If you look at the map of the District of Columbia this is huge. This is a huge, prominent green space that needs a lot of attention.</p> <p>Anything that happens here will have a lot of effect not just on the perimeter neighborhood, on the Chesapeake Bay, the Potomac River, all of the greater environment that we're not really talking about tonight, so we can't forget about that.</p>
173.	4.1	<p>Stephens, Arlus J. Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby</p>	<p>The DEIS does not consider the heat-retention impact that the proposed dramatic replacement of green meadows, lawn and trees with buildings and paved surfaces will have on temperatures in the surrounding area. The dominant green space on the current AFRH campus has a cooling effect that will be radically altered if heat-retaining buildings, parking lots, and roads are constructed where grass and trees now stand. The increased temperatures will result in higher cooling bills, particularly burdensome for the elderly poor, or an increased frequency of dangerous summer conditions for those who cannot afford air conditioning, again particularly the elderly poor. Increased temperatures will also worsen the impact of the increased automotive exhaust associated with the proposed development by promoting local ground-level ozone formation. It will also have a deleterious effect on those neighbors with respiratory conditions.</p> <p>Similarly, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality.</p>

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174.	4.1.2	Arguto, William EPA	<p>Page 4-10 states that “Where possible, the open channel systems on the AFRH-W campus should be utilized to alleviate additional loads on the combined sanitary/stormwater sewer system.” However, jurisdiction determination of the channel systems may prevent utilization as a stormwater management system.</p> <p>It is the recommendation of the EPA to discourage the utilization of non-tidal wetland systems for stormwater treatment and management. Numerous studies have shown that siting these facilities in wetlands leads to the degradation of aquatic ecosystems by contributing to thermal pollution and downstream warming. Furthermore, an in-stream stormwater management and water quality treatment facility will alter hydrology, and increase erosion and sedimentation rates. Retaining stormwater and changing the natural flow rate will alter the natural level of the water table and change the surrounding wetlands vegetation. Water temperature, habitat composition, and food availability are all directly affected when streamside vegetation is lost. Stormwater management structures in wetlands will not prevent pollutants such as fertilizers, pesticides, spills, sediment, and urban contaminants such as bacteria, heavy metals and petroleum from automotive activities, from entering the surface waters since the structures are already in the surface water. Wetlands are important components to the aquatic ecosystem that provide flood flow desynchronization, maintenance of water quality, habitat and nutrient uptake functions. EPA’s mandates include the preservation of these environmentally significant values and functions.</p>
175.	4.1.2	Arguto, William EPA	<p>Page 4-13 states, “The stormwater storage requirement for the site can be satisfied with stormwater management ponds, underground storage pipes or concrete structures built in conjunction with quality control structures, or a variety of urban Best Management Practices (BMPs).” Although low impact best management</p>

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			<p>practices such as bioretention facilities, infiltration trenches, dry wells, and rock trench level spreaders are proposed to reduce the effects of stormwater, it is important to note that stormwater ponds and other stormwater facilities do not replicate natural systems, which greatly slow water before it reaches streams, wetlands and other waters. Development results in the loss of trees and other vegetation, the compaction of soils by heavy equipment and the creation of vast stretches of connected impervious areas. These combined factors are extremely difficult to compensate for using traditional practices. Prior to the development of any structural stormwater practices on a site, significant reductions in stormwater quantity and quality impacts can be made through enhancements to site design.</p>
176.	4.1.2	Stephens, Arlus J. Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	<p>Many residents in the area to the west of AFRH use their basements for living space or rent them out to gain much needed income. AFRH enjoys the physical advantages of being the third highest point in the District of Columbia. The draft EIS has not considered how dense construction on the AFRH property will change the water table and how this might affect basements in the adjacent, lower lying area, or simply what will be the effect to drainage systems, natural or man made. A raised water table could result in a serious damage to the use of basements and a substantial loss in income.</p>
177.	4.1.2	The Potomac	The destruction of open space in an urban setting creates numerous problems.

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		Conservancy	First, the addition of impervious surfaces will create increased run-off and lead to the degradation of the fish ponds, and channeled streams. The streams and runoff eventually add to the overall decline in our major waterways such as the Potomac River and Chesapeake Bay.
178.	4.1.2.2	AFRH Master Plan Committee	<p>The golf course is intended to remain a permanent part of the facility outside of the zoned development area.</p> <p>Past and present storm water run-off adversely affects several fairways and greens. The third hole fairway, and most heavily, the area of the eight green.</p> <p>Mitigating measures are estimated to greatly reduce further storm water and waste water run-off with minor long term adverse effects.</p> <p>Even a minor increase of run-off and pollution will severely damage the eighth hole, making it unplayable both short and long term.</p> <p>Cross compound construction will create new structures, pipe lines and impede access to the golf course both short and long term.</p>
179.	4.1.2.2	DC Office of Planning	<p>The mitigation measures outlined in the draft EIS report address both the short- and long-term impacts of the increased stormwater runoff that would be generated as a result of increased imperviousness from the development. In particular, we strongly support implementation of the low impact development (LID) practices such as bio-retention, infiltration trenches (where the soils are suitable), dry wells, rock trench level spreaders, and vegetative controls outlined in the report. However, in addition to the above list of best management practices, we recommend that the developers also look into the feasibility of green roofs because of the numerous environmental benefits that can be achieved from such systems.</p>

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180.	4.1.2.2	District of Columbia Department of Housing and Community Development (DHCD)	Maximum use should be made of environmentally sensitive “green’ building and site design strategies (such as permeable parking lot paving and green building roofs) in order to minimize the increase in the amount of new impervious pavement and building tops generated by proposed development in the six development zones of the Master Plan.
181.	4.1.2.2	Donahue, Kathleen	Tables 4-4, 4-5, and 4-6 highlight various issues related to storm water runoff. Unlike table 4-3, no baseline is provided to indicate how the values compare to pre-development levels. This information is necessary to understand the real impact of the development on the watershed.
182.	4.1.3	Arguto, William EPA	<p>To determine the baseline value of the habitat and the severity of the potential impacts from the proposed project, EPA recommends that a baseline Habitat Evaluation Procedure (HEP) be completed on the study area using the U.S. Fish and Wildlife Services’s Habitat Evaluation Procedure. If the impacts of the wildlife and terrestrial habitat are unavoidable, the HEP will help to determine the type of mitigation measures which would be considered appropriate for the potential impacts.</p> <p>Measures to avoid potential adverse impacts to these resources should be evaluated and implementation and mitigation plans to minimize impacts should be developed. Where such impacts cannot be avoided, adequate compensation developed through habitat assessment must be implemented.</p>
183.	4.1.3	Donahue, Kathleen	Although this section addresses reduction in green space and wildlife habitat, it does not address the issue of human/animal contact caused by the reduction of

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			habitat. This could increase levels of road kill from animals entering developed areas from green space. I believe the impact on terrestrial biota would be higher than stated in the DEIS.
184.	4.1.3	Kenngott, Christine	A call for a more thorough assessment of impact to wildlife is in order. To simply say this is an urban area so impact is minimal is absolutely false.
185.	4.1.3	Kenngott, Christine	At the current time, the mature trees on the AFRH property contribute positively to air quality and cooling, particularly in the immediate vicinity of the property. The EIS has not considered the specific impact of loss of trees on the property on area temperature and air quality.
186.	4.1.3	Songer, Melissa	I would call for a more thorough assessment of impacts to wildlife. To simply say this is an urban area so impact is minimal is absolutely false. As a Smithsonian research biologist who has studied urban ecosystems, I am sure impact to such an area is not minimal and will be trying to pursue a study which will prove it if development of Zone 6 proceeds. This area should be off-limits. Preserving this area will be some protection for wildlife that will be affected by the development.
187.	4.1.3	Stephens, Arlus J.	The DEIS did not make clear that any development would include retention of all mature trees. Keeping these trees is important, particularly in the historic character areas. All development alternatives must be crafted in such a way as to preserve the mature trees.
188.	4.1.3 and 4.3.2	Department of the Interior	The AFRH-W presents special and unique values to the overall setting of the Nations Capital in that it provides viewpoints from which the National Capital can be seen, as well as having a significant presence when viewed from many locations. Thus, we believe that the FEIS should define specific building height limits and

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			levels of mature tree growth preservation. Certainly the indication of the general extent of development and landscaping of the area should be envisioned in the FEIS in order to indicate the scope of impacts and extent of mitigation necessary.
189.	4.2	AFRH Master Plan Committee	<p>Within Section 4.2 Social Environment the only consideration is given to Population and Housing with no mention of the Social or Economic Characteristics outline in the Fact Sheet for Census Tract 23.02 (that tract in which the AFRH-W is located). Reference to Question (2) under Chapter 3, page 3-11.</p> <p>Why is no consideration given to the consequences of the proposed alternatives on the social environment and the Social and Economic Characteristics of the “Ground Zero: impact area of the alternatives (Sheridan and Scott buildings at the AFRH-W)?</p>
190.	4.2.1	Donahue, Kathleen	Social Environment - States that the affect of the change to the views from the Park View neighborhood would have long term, moderate, and adverse from the perspective of those residents who may prefer to look out on open space. I can attest, as one of those residents, that the affects to my view would be severe or highly noticeable or major. No mitigation measures are included in this section. Development proposals could require the maintenance of significant green space in this area along with development, so that only some of the traditional views are disrupted.
191.	4.2.1	Tubman, Michael	Park View residents enjoy a view of the trees and green areas of the Soldiers Home. The draft EIS recognizes the loss of this viewshed on p. 4-19, unfortunately no mitigation measures are mentioned for this loss. The FEIS should include the option of mitigating at least some of this loss of the historic "park view" of the neighborhood.

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192.	4.2.2	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	The proposed development will have disproportionate negative health effects on minority populations. Specifically, air pollution problems are local as well as regional in scope. The nearby neighborhoods would experience the largest change in air quality from the increased traffic and other pollution sources associated with the proposed development. Further, local air pollution is linked to increased incidence of respiratory illness. Three different recent studies being published this month in Epidemiology find a significant link between daily ground-level ozone in cities and mortality rates in the next 3 days. Ozone is formed when pollutants, such as car exhaust mix with heat and sunlight. Editors of Epidemiology have made the rather unprecedented comment that together these studies point to an "urgent need to reduce public exposure to ambient ozone by all possible means." To that fact must be added that communities of color across the nation are experiencing disproportionately high levels of asthma and other respiratory illness. The deteriorated local air quality will also worsen these health problems in this predominantly African American neighborhood. The heat-retention effect of the loss of current AFRH green space will also promote additional local ground-level ozone formation. Finally, the current mature trees on the AFRH property contribute positively to air quality, particularly in the immediate vicinity of the property.
193.	4.2.2.2	Van Wye, Brian	Stormwater Impact should be very strongly controlled – no net impacts
194.	4.2.3	Catherine McCarthy	Any thoughts as to the increase in crime to come with the influx of thousands of people working and living on the grounds and what will be done to ensure our safety?
195.	4.2.3	DC Fire & Emergency	The contents of this plan will have an impact on the DC Fire and EMS Department. However, the impact amounts to the normal daily operating practices that are

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		Medical Services	<p>already set in place by the department. Basically, your plan is proposing to sell or lease the land that the AFRH currently occupies for future urban development purposes.</p> <p>This will offer more potential building structures that the DC Fire and EMS Department will be responsible for in the area of incident mitigation, emergency response, and fire inspections.</p> <p>Understanding the fact that the city is on an upward growth path, this proposal renders minimal impact to the fire service as long as all structures and occupancies are erected according to the current codes and standards set forth by the District of Columbia, especially in the area of fire department access, fire detection and suppression systems, and emergency planning.</p>
196.	4.2.3	Patykewich, Leslie	<p>Absorptive capacity of DC infrastructure. It is of huge concern that the DC police department is already operating with limited resources. I am concerned that the capacity of the DC infrastructure to absorb increased demands has not been adequately considered.</p>
197.	4.2.3 and 4.4	Fenty, Adrian	<p>Upon reviewing the draft environmental impact statement and discussing the proposed development with community leaders in the surrounding neighborhoods it is clear to me that any development of the campus of the Armed Forces Retirement Home will have a large impact on the communities around the site, especially those in Ward 4 where I represent.</p> <p>I am particularly concerned about the possible impact the new development may have on traffic flow in concert with our existing infrastructure and the historic preservation issues associated with the property which were just so eloquently addressed. Development of this property provides a rare opportunity to create and</p>

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			make available open park space for community use as well and it could influence the economy by incorporating some of those values.
198.	4.2.4	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby	Finally, and perhaps most importantly, the DEIS has not adequately taken into account the Federal Elements of the Comprehensive Plan for the National Capital adequately. In particular, there appears to have been an marked inattention to the Parks and Open Element and the Preservation and Historic Features Element.
199.	4.2.4	DC Office of Planning	District revitalization/economic development priorities within the area include: 1) Georgia Avenue/Great Street land assemblage, retail improvement/attraction and redevelopment; 2) McMillan Sand Filtration Site redevelopment potential, and 3) cumulatively, the impact of all proposed area development on the transportation, traffic, transit and parking networks.
200.	4.2.4	DC Office of Planning	As the site development process progresses, more information should be provided regarding development areas that will be leased and/or sold for private development. The land areas sold to private developers will be subject to the Districts land use and zoning regulations.

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201.	4.2.4	Hoffman, Sandra	<p>The second question I have is the federal elements of the comprehensive plan for national capital provide the guiding criteria for this development from what I understand from the EIS. One element of the federal elements is to enhance park and open space system of the national capital region and to ensure adequate park and open space for future generations.</p> <p>We are currently seeing very dense residential development throughout Columbia Heights. We are very soon going to be seeing groundbreaking on two large projects on Georgia Avenue and we hope and expect to see much more of that along Georgia Avenue and Sherman Avenue and I think the neighbors very much welcome that kind of dense residential development. I may be speaking for myself but so far we've been able to work things out with planning. Everyone is going to work for the neighborhood.</p> <p>Those developments are within two to six blocks of this space. As I said, we are already experiencing a lack of parkland for recreation in this part of the city. This is one of the few large remaining open spaces available in central DC so my question is why isn't a sizeable park part of the development plan for this site and in particular I would think that Area 6 looks like it would be particularly appropriate.</p>
202.	4.2.5	Valenti, Cliff	<p>Under the "no action" plan, it says there will be an adverse economic impact to the AFRH-W because of insufficient funding this statement is intellectually dishonest. A "no-action" option would have a neutral effect (no effect) on the current financial situation.</p>
203.	4.3.2	District of Columbia Historic	<p>The Master Plan repeats the idea that the AFRH represents the transition between the residential uses to the west and southwest and the institutional uses to the east and southeast. It may be fruitful to compare the AFRH with a neighboring</p>

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		Preservation Office	<p>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. 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 AFRH, and in the absence of any historic preservation regulation of the campus, whatever historic landscapes and vistas that might have once existed at Catholic have since been reduced to the green lawns surrounding the buildings. The exception is the playing fields at the north end of the campus which are analogous to the golf course that would be retained at AFRH. 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 any scenario – with similar, if not 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 necessarily 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.</p>
204.	4.3.2	District of Columbia Historic Preservation Office	<p>The Design Framework is, frankly, contradictory on the intended character of the campus. It points out an opportunity to reinforce the “sharp contrast” between the edges of the proposed “urban” construction and the remaining open landscape (“one becomes a backdrop for the other”) – then twice states that there is no need or desire for “a hard urban edge,” and yet suggest how “an urban edge in a landscape could be addressed.” With regard to protecting the setting of the</p>

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			<p>significant buildings and the overall character of the property, the Design Framework is absolutely correct in stating that “buildings should be subtly integrated into the existing landscape.” It is difficult to imagine, however, how an additional six to eight million square feet of construction, expressed as buildings ranging from four to ten stories in height, can be accommodated subtly. The plan proposes more than quadrupling, if not more than sextupling, the present built area. This seems more along the lines of the “staggering mass” of large buildings added in accordance with the 1947 and 1953 master plans – resulting in the demolition of historic buildings and the interruption of views and axial relationships, but fortunately never completely realized (see page 18). It is clear that at some point a balance between open space retention – as both historic landscapes and as bucolic setting for the buildings – and the built area itself will reach an unfortunate tipping point. We fear that, instead of subtly inserting buildings into the landscape, what is proposed is essentially to shrink the campus and build around it something that is very different in character. The possible parcelization shown on page 27 imperils a substantial portion of the Chapel Woods, as well as the formerly cultivated area (Character Area 7) located along Rock Creek Church Road and serving as a buffer to the neighborhood to the west. While in form, the built environment might relate to the remaining large pieces of open space in the manner suggested by the photograph of the very urban Park Squared Gardens, London on page 20, the new development would mostly be segregated from such spaces by the proposed new security perimeter.</p>
205.	4.3.2	District of Columbia Historic Preservation Office	<p>While we appreciate the candor of the general determination of effects, there is relatively little analysis of what the particular effects might be. With the exception of the “Urban Design Framework Diagram” on page 22 of the Master Plan – which</p>

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			<p>shows that nearly all of the identified primary views would be adversely affected – there is no attempt to relate the plan to the previous surveys of cultural resources. There is no examination of which buildings might be demolished or expanded. The figures for new floor area are proposed in addition to the existing contributing and non-contribution structures, but it is not clear how the new construction would occur in relation to the old. Such analysis is expected in an EIS, and some proposed mitigation of adverse impacts would be appropriate. A finding of “long-term, major effects” is, in a sense, facile because it does not state any probable effects in particular. We refer you to Hector Abreu’s comments on the Master Plan sent to Gary Porter on June 27, especially reuse and prioritization analysis of the sort he suggests in his point #13 and better graphic representation of what build-out might look like as suggested in points #8 and #9 (or as rendered in an axonometric massing model of the campus which would include both building bulk and parking facilities). In doing so, the Character Area Guidelines (pages 30 -33) should be applied. Acknowledging significant adverse effects appears to be directly contrary to the Master Plan’s first objective: “Maximize development on the AFRH-W while maintaining the historic character of the site and retaining significant existing open space.” And “significant existing open space” is ambiguous in that it might suggest simply the preservation of “significant” amount of open space as opposed to the preservation of significant open spaces.</p>
206.	4.3.2	District of Columbia Historic Preservation Office	<p>Our greatest concern about the draft master plan is the bulk proposed. The AFRH has had a low-density campus character since its founding in the mid nineteenth century. The campus is presently a “garden in the city,” as characterized on page 20 of the master Plan; at best, the Design Framework proposes to create instead a “city in the garden.” The development zones have the potential to exceed the</p>

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			density of the surrounding rowhouse neighborhoods (the highest-density alternative could, if spread over the entire campus, nearly cover the entire property one story deep – but each of the options concentrates the vast majority of the built area on substantially less than half of the property, with heights up to ten stories, or perhaps twelve or thirteen – see page 27).
207.	4.3.2	District of Columbia Historic Preservation Office	Naturally, security measures will be another issue. The nature of a campus is in the relationships that exist between buildings and landscapes. Views and passage through the landscape are very important to the character of campuses and to this very historic one. Creating a new fence line across the campus will adversely affect these aspects. The Character Area Guidelines take a good initial stab at this problem.
208.	4.3.2	Hafvenstein, Lauri	The EIS also fails to address the unique role that the AFRH has played in the development and life of the Columbia Heights and Petworth communities. These local neighborhoods of historic row houses—including those in <i>Park View</i> , where I live—were laid out in the early part of the 20 th century to take advantage of views to the open space along the western edge of the property. The very character of the area is defined by the beauty and quiet that residents and passersby enjoy each day.
209.	4.3.2	Hafvenstein, Lauri	<p>We are standing on sacred ground and once the cement is poured it can't be brought back. I have read the EIS and I do not feel that enough attention has been given to the adverse impact to the historic landscape. I think that this impacts not just the neighboring community but the city and indeed the entire nation. Are we developing this land for the nation? It appears that we are not.</p> <p>There are untold hundreds of thousands that have not yet discovered Lincoln's Cottage. Nor have they yet found the first Arlington Cemetery behind the cottage</p>

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			<p>where soldiers from the First Battle of Bull Run and other conflicts are buried. We should think of the land surrounding these sacred sites no differently than the space around Washington's Mount Vernon or Jefferson's Monticello.</p>
210.	4.3.2	McGluray, Andrew	<p>In addition I think the EIS really doesn't consider seriously enough the impact on what they call the historic character areas and Arlus was speaking about one of these earlier. And what's really bizarre to me, if you look at the map of the parcels proposed for development in the EIS and then you look at the map of what are considered the historic character areas, it's almost a perfect overlap.</p> <p>It's like they've picked essentially the areas with the most historic significance as those to sell off and I realize there may be some reasons for some of that but it doesn't seem like something that's very wise and they really ought to look at at least avoiding the areas that are considered to have historic character.</p>
211.	4.3.2	National Trust for Historic Preservation	<p>The DEIS acknowledges that each of the proposed Master Plan alternatives (excluding the No Action Alternative) will have “direct, long-term, major, adverse” impacts on the Home’s historic resources. DEIS at vii, and 4-34 to 4-35. Perhaps the most substantial impact on historic resources, including the National Monument, will be the result of the scale, height, and density of the new construction. The magnitude of the development proposed in the Draft EIS ranges from a total of 6.055 million square feet, at the minimum, to a maximum total of 8.745 million square feet, located in 6 identified zones. As indicated in the DEIS, this level of development would change the setting and views from the National Monument, the National Historic Landmark and National Register-listed portions of the campus; would result in the loss of National Register-eligible cultural landscapes; and would alter the historic context of buildings and obscure the relationship between the buildings and the landscape. Anyone who has visited the</p>

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			<p>site is keenly aware of the importance of the views from the Home toward Washington’s monumental center, including views of the United States Capitol Building and the Washington Monument. These same views undoubtedly inspired President Lincoln as they continue to inspire and renew the residents of the Armed Forces Retirement Home and visitors to the Lincoln Cottage today.</p>
212.	4.3.2	National Trust for Historic Preservation	<p>Mitigation measures (not spelled out in the DEIS) should ensure that development within the Intact Character Areas be limited to adaptive reuse of historic structures and that any new construction be strictly compatible with the contributing properties in the historic district.</p> <p>Another concern with the DEIS is the limited extent to which it explores the potential mitigation of the adverse impacts on historic resources. The DEIS indicates that AFRH has initiated consultation with the DCHPO as required pursuant to section 106 of the National Historic Preservation Act, and that a programmatic agreement is being developed to identify mitigation measures, including preservation design guidelines to be incorporated into the final Master Plan. The National Trust submitted a request to be a consulting party in the section 106 process in September 2004. The National Trust strongly encourages AFRH to consult with DCHPO and other consulting and interested parties concerning the development of those mitigation measures prior to finalizing the EIS, so that the mitigation measures can be disclosed through the EIS process.</p>
213.	4.3.2	National Trust for Historic Preservation	<p>The National Trust also encourages the AFRH to revise the DEIS to explore and disclose the cumulative impacts of the proposed Master Plan alternatives on historic resources. Currently, the DEIS simply indicates that the alternatives would result in “long-term, major, adverse, cumulative impacts” on historic resources, DEIS at 4-39, but it does not analyze or explore what those cumulative impacts are,</p>

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			nor whether they could be minimized or mitigated. In order to determine whether such cumulative impacts can be avoided or mitigated, it is essential that these impacts be explored and disclosed in the EIS. This discussion will be particularly helpful in the section 106 consultation process, and will assist in the development of alternatives or modifications to the project that will avoid or mitigate adverse effects, as required under 36 C.F.R. § 800.6(a).
214.	4.3.2	National Trust for Historic Preservation	We're also concerned about the level to which the draft environmental impact statement looks at mitigation efforts to try to protect these historic resources. And we'd like to see it explore in more depth so that the public can have access to that information, some of these mitigation efforts. Some of this will be done through the Section 106 process but typically in the Section 106 process when it's combined with the NEPA process those mitigation efforts are disclosed so that you all and we can be aware of them and participate in talking about them.
215.	4.3.2	National Trust for Historic Preservation	Finally we are also concerned about the cumulative impacts of the development that's proposed and we don't think the draft EIS goes quite far enough in looking at what those cumulative impacts would be. For instance, the cumulative impacts are things like parking needs over time, street construction, and things like that that over the long term will have even greater impacts so we'd like to see the EIS address those.
216.	4.3.2	Patykewich, Leslie	While the AFRH may be preserving some of the historic buildings, the plan appears to ignore the overall historic integrity as it does not reflect or consider the value of preserving the surroundings to these historic buildings. As stated at the June 22 meeting, development will permanently change the historic value unique to the AFRH. In addition, the proposal appears to be inconsistent with existing architecture and therefore not preserving the historic quality of the community. For

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			example, while the draft claims that options will be consistent with neighboring architecture, the plans propose buildings (6-8 stories). This is NOT consistent with the existing architecture.
217.	4.3.2	The Potomac Conservancy	Third, the development of a historically open space will change the character of the community and degrade the environment. The meadow, pastures, and community garden will be destroyed to create a glut of buildings and parking lots. These open areas are a link to the subsistence history of AFRH. The current residents enjoy the walkways and vista of greenery.
218.	4.3.2 and 4.8	AFRH Master Plan Committee	<p>Chapter 4, page 4-35, Character Area 3: Chapel Woods</p> <p>It is logical to assume that with spills of oil, gas, etc, the Auto Craft Shop has experienced some soil contamination. A stated objective of the AFRH-W master Plan is “Preserve and improve the essential components of the AFRH-W for the residents and the community”. If the Auto Craft Shop falls within the definition of “essential components of the AFRH-W then it is logical to expect that the shop will be relocated to another area within AFRH-W.</p> <p>What specific measures will be taken to ensure that soil contamination is eliminated at the new location? Where within the master plan is the designated location of the relocated Auto Craft Shop? Where will the Motor Homes, Campers and other large vehicles associated with the Auto Craft Shop be relocated?</p>
219.	4.3.3 and 4.11	Donahue, Kathleen	The DEIS addresses the adverse affects of developments on historic viewsheds, the historic cultural landscape, and the historic district. It cannot be emphasized enough that once a historic place is destroyed, it cannot be replaced.
220.	4.4	AFRH Master Plan	Does the data in tables 4-10 through 4-16 accurately reflect a twelve month period as opposed to reflecting only the specific period of the actual measurements which

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		Committee	<p>were taken at the specified times?</p> <p>Do the vehicle trips discussed under each alternative accurately reflect the 17,000 additional vehicles referred to elsewhere in the EIS?</p>
221.	4.4	AFRH Master Plan Committee	<p>What will be the environmental impact when all parking spaces located within the development zones currently reserved for residents, employees and visitors are removed from their current location and moved to a new location?</p> <p>Where and when will the parking facilities be relocated and what will be the environmental impact of this relocation?</p>
222.	4.4	AFRH Master Plan Committee	<p>What initiatives are in place or planned to accommodate vehicle traffic and parking when the Lincoln Cottage is open to the public?</p>
223.	4.4	Barreto, Carlos and Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby Stephens, Arlus J.	<p>The impact on traffic is vague and unexplored. It requires more details, specifics, and cost information. There is no information about the impact on the community of the number of peak-hour trips suggested in terms of cost to the city of Washington DC to address, the damage to the local infrastructure, and the overall impact on the surrounding community.</p>
224.	4.4	Barreto, Carlos and	<p>The transportation impact study of the EIS has not considered the impact of</p>

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61.		Sandra Kenngott, Christine McGilvray, Andrew Pansegrow, David Tufu, Adan and Janet Wahl, Abby Stephens, Arlus Hoffman, Sandra	increased traffic on side streets between the affected AFRH property and Georgia and New Hampshire Avenues. The impact of the level of increased traffic considered is unlikely to be limited to the main streets currently studied in the EIS. More specifically, the neighborhoods to the west of the AFRH property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The EIS has not considered the impact of increased traffic on loss of recreational services provided by streets in Petworth and Park View. In addition, the District of Columbia government has recognized that there is a serious problem with pedestrian deaths from automobiles on city streets. Bringing a large number of automobiles into narrow residential streets will likely increase the mortality rate in the area to the west of AFRH, particularly because of the relatively large number of elderly and children.
225.	4.4	Catherine McCarthy	What will be the traffic pattern(s) on the home grounds and who will control it? How will the increase in traffic, on the grounds, impact foot traffic and those on BPVs?
226.	4.4	Catherine McCarthy	Who will be responsible for the upkeep of the roadways on the home grounds?
227.	4.4 4.2.3	Donahue, Kathleen	Transportation section is woefully inadequate in addressing the affects of the proposed development on public transportation needs and infrastructure. This topic is not addressed in either 4.4 or 4.2.3. New residents would undoubtedly use automobiles but many would use public transportation too. Increased use of nearby Metro station and Metrobus system is not addressed, nor is potential need for

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			<p>additional bus lines. The changes could be costly and detrimental to current users. Overcrowded trains and buses, increased traffic could slow public transportation for residents all over the area. Bicycle transportation is not addressed in the DEIS. Increased traffic will significantly increase the level of risk for those who use bicycles to commute to work.</p>
228.	4.4	Ewert, Mark	<p>I also found that the EIS does not account for a huge amount of people that might be on this property. The people who might be patients and visitors to the medical facility, the people who might be visitors to the hotel and conference center, the people who would be shoppers in the proposed retail spaces, and the visitors to the national monument are not accounted for. I created some formulas for those. They are in the letter that I have sent so I won't go over those formulas for the interest of time but there could be up to 50,000 people on this piece of property. That's the size of Harrisburg, Pennsylvania, so if we think that our surfaces around this area can withstand this environment, can withstand 50,000 people all at once, I would be very much surprised.</p>
229.	4.4	Grandy, Timothy	<p>Rock Creek Church Road volume</p> <p>Two lanes of traffic that cannot be expanded.</p> <p>The DC government has refused to provide any type of traffic calming measures along this road, including the use of sidewalks to access north bound busses. Pedestrian safety is key, but it is not being adequately addressed. The development plans worsen this situation.</p> <p>Access to area 6 and the neighborhoods bordering Rock Creek Church Road cannot be via Harwood Road from North Capitol Street. In assisting traffic to flow more effectively through to the suburbs, the Federal Government has eliminated access</p>

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			to the neighborhoods via this route. This will further saturate the flow of traffic along Harwood Road. Because of this, Warder Street will become overburdened with North bound traffic until Rock Creek Church Road.
230.	4.4	Grandy, Timothy	<p>The Upshur Street Gate</p> <p>The one-way streets currently used to calm traffic flow in the neighborhoods near the Rock Creek Church Road and Upshur Street intersections, causes traffic to stack up on Upshur Street during the morning and evening rush hours, result in a land locking effect for residents north of Upshur Street, and east of Third Street desiring to go east.</p>
231.	4.4	Grandy, Timothy	The street patterns of the proposed new development should work in with the established city grid and planning. This includes the use of green spaces, parks, and vistas
232.	4.4	Grandy, Timothy	Office development of the property will contribute a 9-5 traffic component and the hospital will create traffic within these hours from patients visiting the medical center.
233.	4.4	MedStar/Washingt on Hospital Center	The major street arteries adjacent to the site, such as North Capitol Street and Irving Street and Michigan Avenue provide excellent access to the site. A relatively high density could be accommodated so long as residential areas to the northwest are protected. The characteristics of the site, with large open spaces, lend itself to appropriate urban development appropriate so as to counteract urban sprawl. Metro's Red Lien is sufficiently close to the site that shuttle bus service benefiting all in the immediate community would reduce traffic.
234.	4.4	MedStar/Washingt on Hospital Center	The traffic impact identified in Alternative 2 overstates the projections Washington Hospital Center developed by a factor of 2.

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			<p>We believe the Environmental Impact Analysis of ALT 2 overestimated total peak hour trip generation by a factor of 2+ forecast 21,269 trips vs. 8,983 trips. The principal reasons for the over estimation were:</p> <ul style="list-style-type: none"> • Use of junior/community college ratio for the area designated as medical education. This overstates the need by 6 times. • Does not account for replacement of existing trips (WHC move to AFRH takes traffic away from WHC campus). • Does not account for full impact of internal capture and transit - 2 Metro stops and 5 bus routes directly serving adjacent land use. • Does not recognize shift change hours for medical facilities vs. office users that mirror rush hour, i.e., clinical facility staff arrive before a.m. peak hour and leave before p.m. peak hour <p>Parking demand for ALT 2 was overestimated by a factor of 2. Note that NIH with a daytime population of 17,000 only provides 8,000 spaces on its 300 acre campus.</p> <p>Suggest that prior to assigning final traffic impact, a more refined analysis be undertaken to more accurately predict future growth parameters – note also that the full development programs is spread over a 15-20 year time frame. This allows for adjustments to be made in roadway configuration, mass transit utilization, internal traffic management, and development staging.</p>
235.	4.4	Patykewich, Leslie	The lack of a nearby metro station will result in an already taxed road system being further overburdened.
236.	4.4	Patykewich, Leslie	Conduct a rigorous and unbiased parking and traffic study that considers nearby approved development

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237.	4.4	Rooney, Thomas	<p>The DC Office of Planning has stated there will be no major highway. This is from some of their own propaganda. DC will have no major highway improvements to 2025, and that's from the Regional Plan to 2025, the year 2000 update to constrain long-range plans.</p> <p>So the long-range plan is there is no money to improve the roads. Well, back in 2001 when we got this information some from workshops they were doing on McMillan the North Capitol and Michigan Avenue intersection was a level of service D in a range going to F, failure.</p> <p>The Office of Planning's solution to the coming traffic crisis was, "The developers will have to coordinate mitigation with other major traffic generators to solve traffic issues." From that gobbledegook it seems that DOT is not responsible for the traffic and the developer is going to be responsible for the traffic but how does a developer be responsible for the traffic when in the EIS statement they admit that North Capitol and Michigan, Harewood Road and Michigan, and First Street and Michigan all will be rated F? Currently they're rated D so we are only one step from F.</p> <p>So all of this additional traffic will have a humongous impact. On page 441 labeled "Trip Generation" is expected from the development AM peak hours 11,310 vehicles. That's per hour. PM peak hours, 9,960 vehicles, that's per hour. So that is not workable. Everything will clog down.</p> <p>Interestingly enough, the DC DOT put out a little pamphlet the other day, mailed it around to residents about what to do when we get attacked by terrorists or whatever, how are we going to get out of the city. Well, I happen to notice on the</p>

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			<p>map on the back that if you live in this area of Brookland or any place in between on North Capitol and Michigan you either go out Georgia Avenue or Rhode Island Avenue and somehow North Capitol is left off. You don't go out North Capitol.</p> <p>And I guess they're recognizing from their own propaganda here that it will be completely unusable and that's now, not in the future sometime. I just wanted to point out quickly that this EIS is not in a development vacuum. There is a development proposed for the McMillan Reservoir which is horrendous. It doesn't take into account the current development going on or expansion on the campus of the Medical Center and they're building a 1500-car parking building right now on the corner of First and Michigan.</p> <p>It doesn't take into account the six or seven acres that were up for development at the corner of Irving and Michigan and they are still up for development. The Hilton outfit was going to build a convention center and hotel there but now it's up for grabs, six or seven additional, and Catholic University owns two or three city blocks that are up for development. So I just wanted to point out the traffic here is going to be a huge and unsolvable issue</p>
238.	4.4	Stephens, Arlus J. Hoffman, Sandra	<p>Moreover – and of particular concern to those neighbors left out of the communications loop in Wards 1 and 4 -- the transportation impact study of the EIS has not considered the impact of increased traffic on side streets between the affected AFRH property and Georgia and New Hampshire Avenues, NW. Based on some of the proposed development plans, the impact of the increased traffic will not be confined to the main streets currently studied in the EIS. The neighborhoods to the west of the AFRH property have a large number of children. Because of the lack of park area and because side streets are currently relatively calm, children use the streets for recreation. The EIS has not considered the impact of increased</p>

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			<p>traffic on loss of recreational services provided by streets in Petworth and Park View.</p> <p>In addition, the District of Columbia government has recognized that there is a serious problem with pedestrian deaths from automobiles on city streets. Bringing a large number of automobiles into narrow residential streets will likely increase the mortality rate in the area to the west of AFRH, particularly because of the relatively large number of elderly and children.</p>
239.	4.4	Sullivan, Matthew	<p>The effect of increased traffic is not sufficiently explored in the EIS. More detail and study, including of potential mass transit hubs, needs to be included in the final EIS.</p>
240.	4.4	Swanson, Lisa	<p>The EIS notes the relatively poor public transit options nearby. Though the entrances to the site are barely within walking distances of Metrorail stations, they are underserved by buses, with one route running along the northwest gates, two along the south, and none along the eastern perimeter. Thus the development options evaluated rely on acres of parking; Plan 2, the most extensive, considers building 17 thousand parking spaces. Yet there is no inclusion in any options for bikeways and pedestrian walkways to or within the existing perimeter.</p> <p>The Washington Post of 22 June included an article proposing extensive new development (though in a completely different type of site at a Metrorail station, and outside the Beltway) designed to discourage the use of cars ("Mini-City Plan Discourages Use of Cars," Metro, June 22). This would introduce a radical rethinking of development within the metropolitan area, but a necessary one for the health of the city.</p>
241.	4.4	Swanson, Lisa	<p>And the second thing that jumped out at me was this number that's come up a</p>

Comment Number	EIS Section Number	Commenter	Comment
			<p>couple times, 17,000 parking spaces. I think the Home Depot maybe has 500 or 800, something like that, so 17,000 is phenomenal and that to me is a huge problem. The statement mentioned that there are three Metro stations close by. I think they're walkable, not everybody thinks they're walkable, but this area is completely underserved by buses, as the previous guy mentioned or someone else did, two near the hospital, one on Rock Creek Church, zero buses on North Capitol.</p> <p>So if somebody is planning on needing 17,000 parking spaces they are thinking about a lot of traffic and I know that's the maximum. Today's Washington Post has a story that I hope everybody would look at. The title alone is exciting to me, "Mini-city Plan Discourages Use of Cars." There is a plan underway right now in Vienna, Virginia, to completely rethink the use of cars in an urban area.</p>
242.	4.4	Tulchin, Drew	<p>The increase in as many as 50,000 people on this space does not consider reasonable physical space for parking, attractive building, and quality of life for work or living. We expect federal standards of parking of 1:5 ratio and other federal requirements be established for mitigation.</p>
243.	4.4	Valenti, Cliff	<p>Traffic considerations do not include increases from the Lincoln Cottage, or the hotel planned for the sight, not to mention that it is far enough away from the metro station that most people aren't going to walk, but drive. Additionally, it does not include an assessment of how traffic will be impacted from the new projects already slated for Georgia Avenue, Columbia Heights, and Petworth.</p>
244.	4.4	Van Wye, Brian	<p>Traffic congestion must be anticipated and mitigated so that impact is zero or negligible.</p>

Comment Number	EIS Section Number	Commenter	Comment
245.	4.5	Donahue, Kathleen	The topic of air temperatures is not addressed in the DEIS. The reduction of green space and increase in heat-reflecting surfaces, automobiles, and utility use is likely to increase the air temperature in the area. This can have dramatic impacts on health, utility use, and safety, especially for the elderly, for nearby residents.
246.	4.5	Maclin, Elizabeth	Increased temperatures will worsen the impact of the increased automotive exhaust associated with the proposed development by promoting local ground level ozone formation.
247.	4.5	The Potomac Conservancy	Second, the proposed development adds to the problem of poor air quality in the metropolitan area. The proposal will add 3,000 to 5,000 additional vehicles in the morning and evening commutes. The increase in vehicles adds to the already poor quality of air in the region through emission of pollutants. Traffic and parking is already a problem in this area. The stationary sources proposed to the land on AFRH-W will also increase levels of pollutants emitted into the air.
248.	4.6	AFRH Master Plan Committee	Chapter 4, page 4-62, Noise Proposed Action Alternatives 2, 3A, 3B, and 4 What are the specific plans to protect AFRH-W residents from short and long range noise pollution?
249.	4.6	Felder, Charles	How long a period will the short term construction be that will seriously affect the health, life spans and peaceful lives of the residents? Is there any way at present to assess any mitigating measures?
250.	4.7	Donahue, Kathleen	The existing workload of WASA could be impacted by the installation of new public water and sewer lines for the development. The ongoing replacement of existing lead service lines may be slowed as a result, prolonging exposure of city residents to unsafe lead levels.