Executive Director’s Recommendation
Commission Meeting: December 5, 2019

PROJECT
Federal Reserve Board Building Project
The Federal Reserve
1951 Constitution Avenue, NW
Washington, DC

SUBMITTED BY
Board of Governors of the
Federal Reserve System

REVIEW AUTHORITY
Federal Projects in the District
per 40 U.S.C. § 8722(b)(1) and (d)

NCPC FILE NUMBER
8113

NCPC MAP FILE NUMBER
1.34(38.00)45007

APPLICANT’S REQUEST
Approval of comments on concept plans

PROPOSED ACTION
Approve comments on concept plans

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY

The Board of Governors of the Federal Reserve System (Board) proposes to renovate and expand the Marriner S. Eccles Building (Eccles Building) at 2051 Constitution Avenue NW and to renovate and construct an addition on the Federal Reserve Board-East Building (FRB-East Building) at 1951 Constitution Avenue NW. The Board is seeking comments from the Commission on their concept plan for the project.

The Eccles Building was constructed between 1935 and 1937 as the headquarters of the Board. While there have been regular modifications and renovations to the building over its 80-year history, many of the building systems are at the end of their useful life, and the building no longer fully serves the Board’s needs. The FRB-East Building was constructed between 1931 and 1933 for the US Public Health Service. The building has not undergone a comprehensive modernization in decades and does not serve the Board’s needs effectively in its current condition and configuration. Located just to the north of the Eccles Building, across C Street, NW, the Board’s William McChesney Martin, Jr. Building (Martin Building) is currently being renovated. When complete, the Martin Building will become the swing space for staff in the Eccles Building during the construction phase of the proposed project.

The Federal Reserve Board currently has a workforce of approximately 3,400 employees. The Federal Reserve Board will be consolidating their workforce into a campus that includes the following owned buildings: Eccles Building, FRB-East Building, 1709 New York Avenue Building, and the Martin Building. Additionally, the Board is currently housed in two leased buildings at 1801 K Street, NW and International Square.
The purpose of the proposed project is to renovate and expand the Eccles Building and the FRB-East Building to address a critical backlog of upgrades; to respond to changes in building codes and regulatory requirements; to accommodate information technology requirements, building security provisions, advancements in environmental awareness and energy efficiency; to address increased utility demands and associated requirements imposed by an increased building population; and to address the integration of technology not anticipated at the time of the buildings’ original design. The proposed programming changes and building additions are needed to increase spatial efficiency, reduce leased space and consolidate staff, and provide a secure environment for the buildings’ occupants, while accommodating the growing needs of the Board and its visitors.

**KEY INFORMATION**

- The Eccles Building, designed by Frenchman Paul Cret, was constructed between 1935 and 1937 as the headquarters of the Federal Reserve Board.
- The Eccles Building was listed in the DC Inventory of Historic Sites in 1964, the year of the inventory’s establishment. The Eccles Building was one of the initial 289 buildings designated. Although not formally evaluated for listing in the National Register of Historic Places, the applicant and Consulting Parties are treating the property as eligible, with significance under Criterion A, Government and Community Development, as the first permanent headquarters of the Federal Reserve Board of Governors and as part of the development of monumental buildings along Constitution Avenue in accordance with the McMillan Plan in the early decades of the 20th century. The property also meets National Register Criterion C, Architecture, as a significant example of Paul Cret’s stripped classicism style for a monumental federal building. The property contributes to the National Register-eligible Northwest Rectangle Historic District. Additional studies will be conducted to assess the significance and the character-defining features of the landscape and the potential for archaeological resources.
- The FRB-East Building was constructed between 1931 and 1933 for the US Public Health Service.
- The FRB-East Building, historically the United States Public Health Service Building, was listed in the DC Inventory of Historic Sites and the National Register of Historic Places in 2007. The property meets National Register Criterion A, for its association with the growth of the Public Health Service and as part of the development of monumental buildings along Constitution Avenue built in accordance with the McMillan Plan in the early decades of the 20th century. The FRB-East Building is also listed under Criterion C, as an excellent example of classically inspired federal architecture in the 1930s. The property contributes to the National Register-eligible Northwest Rectangle Historic District. Additional studies will be conducted to assess the significance and character-defining features of the landscape and the potential for archaeological resources.
- To meet their compliance for the National Environmental Policy Act (NEPA), the Board is preparing an EA which will include a Transportation Management Plan. NCPC is a cooperating agency on the EA.
- To meet their compliance with Section 106 of the National Historic Preservation Act (NHPA), the Board has initiated the Section 106 process, and has held two Consulting Parties meetings to date, and anticipates the process to be concluded with a Memorandum
of Agreement (MOA), to provide commensurate mitigation for expected adverse effects. NCPC has designated the Board the lead in Section 106, and intends to meet its individual Section 106 responsibilities by signing the MOA.

RECOMMENDATION

The Commission:

Commends the Federal Reserve Board for fully engaging partner federal agencies and the Section 106 Consulting Parties through the evolution of the design process for the building project.

Supports the Board’s goal to consolidate their employees into federally-owned buildings, meet its long-term space requirements and address physical and operational deficiencies found in the historic Eccles and FRB-East Buildings on Constitution Avenue.

Finds that the Board evaluated a range of design options (discussed below) with the federal agencies and Section 106 Consulting Parties, to address the needed square footage requirements for the new programming while balancing historic preservation considerations.

Notes that during the federal agency and Section 106 Consultation meetings, the parties generally agreed that a primary objective is to prioritize higher levels of preservation in the more iconic Eccles Building by accommodating more program and modifications in the FRB-East Building.

Notes that based on the discussion and evaluation during the on-going Section 106 Consultation Process in 2019, the Board has proposed three options (A-C) for evaluation with Option B as their preferred massing and height option in order to reduce potential adverse effects to the Eccles Building.

**Eccles Building Massing Options**

Notes that for the Eccles Building, all three options:

- Construct a five-story infill addition on the east and west sides of the building that will connect the existing north and south wings;
- Construct a rooftop addition on the north wing that will connect with the east and west infill additions; and

Notes the following with regard to the east and west exterior courtyards:

- Options A and C cover the east courtyard and convert it into an atrium, while the west courtyard will remain open.
- Option B covers the east and west exterior courtyards (creating atriums), with the east atrium becoming an entrance to the Eccles Building for staff and VIPs.
**Finds** that the east and west side additions are designed to be set back from the existing wings, allowing for the additions to be perceived as compatible and non-historic.

**Recommends** that the applicant continue to explore ways to remove the penthouse additions on the south side of the Eccles Building, to minimize impacts to the historic views towards the Eccles Building.

*FRB-East Building Massing Options*

**Notes** the following massing differences among Option A-C for the FRB-East Building:

- **Option A** includes a six-story addition above grade and retains the FRB-East Building’s center wing; however, it does not meet the Board’s program to house 1,750 seats, falling about 180 seats short.
- **Option B** includes a five-story addition above grade and removes the center wing of the existing building. It maintains the alignment of building faces along C Street, while providing 1,750 seats for staff.
- **Option C** includes a seven-story addition and retains the center wing.

**Finds** that five-story height of the addition to FRB-East compliment the scale of the historic building, and the Eccles Building across the street. The addition would also not be highly visible from the National Mall on the south side of Constitution Avenue.

**Does not support** the taller massing of Alternatives A and C because, while they preserve the historic center wing, the proposed addition to the FRB-East Building is not compatible to the building and the historic context, and is not in keeping with the Secretary of the Interior’s Standards for Rehabilitation concerning guidance for additions to historic buildings.

**Requests** that applicant explore opportunities to reduce the height of the penthouses on FRB-East to minimize any visual impacts.

*Parking and Transportation*

**Advises** that, regardless of the option selected, the project is located in an area of the District with a 1:5 parking ratio under NCPC’s current parking guidance, which will be determined based upon the proposed campus population.

**Notes** the following known parking differences among the alternatives for this submission:

- **Option A** proposes a new underground parking garage below the south lawn of the FRB-East Building (no extension under 20th Street), with 243 new parking spaces. The existing parking garage at the Eccles Building would remain, and would be accessed through the west courtyard.
- **Option B** proposes a new underground parking garage below the south lawn of the FRB-East Building and 20th Street NW, with 577 parking spaces, but eliminates the existing
parking garage at the Eccles Building. The west courtyard would be enclosed as an atrium, and the curb cut would be closed on 21st Street, NW.

- Option C proposes a new underground parking garage of four levels, below the addition of the FRB-East Building instead of the south lawn, with 194 parking spaces. The existing parking garage at the Eccles Building would remain, and would be accessed through the west courtyard.

Notes that the concept submission does not provide the number of expected Board employees for the entire campus nor does it include the number of parking spaces at the Martin and Eccles Buildings. Therefore, the proposed parking ratio is unknown for this review.

Notes the options reflect a range in total parking without explanation for the different amounts.

Finds that the amount and location of parking will have an impact on the overall design of the FRB-East building and possibly the Eccles Building, as well as impact the function of the transportation network.

Supports the least amount of parking as possible given the campus’ access to the Farragut West and Foggy Bottom Metro Stations, as well as other modes of transportation in downtown Washington, DC.

Requests the Board consider options that minimize parking, in consideration of NCPC’s parking guidance, potential impacts to the transportation network, and possible effects on the buildings’ landscapes.

Requests the Board submit a thorough Transportation Management Plan (TMP) as part of the Environmental Assessment, and include the number of expected Federal Reserve Board employees anticipated to be housed in Eccles, FRB-East, and Martin Buildings, summary of employee means of commuting, and locations of employee commutes.

General Comments

Supports the applicant’s intent to preserve heritage trees and other landscape features in the front lawns of the Eccles and FRB-East Buildings.

Supports the applicant’s intent to provide universal accessibility to both the Eccles and FRB-East Buildings from Constitution Avenue.

Requests additional information on the following topics for the next submission:
- Elevations and renderings showing the exterior design treatments for both the Eccles and FRB-East Buildings additions
- Additional massing options for the Eccles buildings related to the penthouse additions, particularly on the south side
- Landscaping for both buildings
- Site lighting, signage, and wayfinding
- Perimeter security
- Tree removal and replacement locations
- Public accessibility on the site, especially the lawns and open space fronting Constitution Avenue.

Notes that a Section 106 Memorandum of Agreement will be executed to address agreed-upon mitigation measures commensurate with adverse effects resulting from the project.

Notes that the Federal Reserve Board is preparing an Environmental Assessment which be released prior to submission for Preliminary Review in 2020.

**PROJECT REVIEW TIMELINE**

<table>
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<th>Previous actions</th>
<th>None.</th>
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| Remaining actions (anticipated) | – Preliminary Review.  
– Final Review. |

**PROJECT ANALYSIS**

**Executive Summary**

The Board of Governors of the Federal Reserve System (Board) proposes to renovate and expand the Marriner S. Eccles Building (Eccles Building) at 2051 Constitution Avenue NW and to renovate and construct an addition on the Federal Reserve Board-East Building (FRB-East Building) at 1951 Constitution Avenue NW. The Board is seeking comments from the Commission on their concept plan for the project. Staff analyzed this project using guidance in the Comprehensive Plan, particularly those related to five of the federal Elements of the Comprehensive Plan: the Federal Workplace, Transportation, Parks and Open Space, Federal Environment, and Preservation and Historic Features elements. In summary, staff finds it to be in conformance with the goals and policies associated with each Element.

The Eccles Building was constructed between 1935 and 1937 as the headquarters of the Board. While there have been regular modifications and renovations to the building over its 80-year history, many of the building systems are at the end of their useful life, and the building no longer fully serves the Board’s needs. The FRB-East Building was constructed between 1931 and 1933 for the US Public Health Service. The building has not undergone a comprehensive modernization in decades and does not serve the Board’s needs effectively in its current condition and configuration. Located just to the north of the Eccles Building, across C Street, the Board’s William McChesney Martin, Jr. Building (Martin Building) is currently being renovated. When complete,
the Martin Building will become the swing space for staff in the Eccles Building during the construction phase of the proposed project.

The Federal Reserve Board currently has a workforce of approximately 3,400 employees. The Federal Reserve Board will be consolidating their workforce into a campus that includes the following owned buildings: Eccles Building, FRB-East Building, 1709 New York Avenue Building, Martin Building. Additionally, the Board is currently housed in two leased buildings at 1801 K Street, NW and International Square. Therefore, staff recommends the Commission supports the Board’s goal to consolidate their employees into federally-owned buildings, meet its long-term space requirements and address physical and operational deficiencies found in the historic Eccles and FRB-East Buildings on Constitution Avenue.

The purpose of the proposed project is to renovate and expand the Eccles Building and the FRB-East Building to address a critical backlog of upgrades; to respond to changes in building codes and regulatory requirements; to accommodate information technology requirements, building security provisions, advancements in environmental awareness and energy efficiency; to address increased utility demands and associated requirements imposed by an increased building population; and to address the integration of technology not anticipated at the time of the buildings’ original design. The proposed programming changes and building additions are needed to increase spatial efficiency, reduce leased space and consolidate staff, and provide a secure environment for the buildings’ occupants, while accommodating the growing needs of the Board and its visitors.

The Board and their design team began meeting with National Capital Planning Commission (NCPC) staff, as well as staff from the US Commission of Fine Arts, and the District of Columbia State Historic Preservation Office (DC SHPO) in spring of 2019 to discuss the project and begin reviewing design options. The Board also initiated the Section 106 process in the summer of 2019 and has held two Section 106 Consulting Party meetings to date, to discuss the project and share the options. As such, staff recommends the Commission commends the Federal Reserve Board for fully engaging partner federal agencies and the Section 106 Consulting Parties through the evolution of the design process for the building project. In addition, staff recommends the Commission finds that the Board evaluated a range of design options (discussed below) with the federal agencies and Section 106 Consulting Parties, to address the needed square footage requirements for the new programming while balancing historic preservation considerations. Furthermore, staff recommends that the Commission notes that during the federal agency and Section 106 Consultation meetings, the parties generally agreed that a primary objective is to prioritize higher levels of preservation in the more iconic Eccles Building by accommodating more program and modifications in the FRB-East Building.

Staff recommends that the Commission notes that based on the discussion and evaluation during the on-going Section 106 Consultation Process in 2019, the Board has proposed three options (A-C) for evaluation, with Option B as their preferred massing and height option in order to reduce potential adverse effects to the Eccles Building. The three options that have been developed each address the overall planning and design objectives of the project. One of the primary objectives is to prioritize higher levels of preservation in the more iconic Eccles Building by accommodating
more program and modifications in the FRB-East Building; therefore, the biggest variation between the options is the height and massing of the proposed FRB-East addition.

In Option B, the addition to FRB-East is five stories above grade. Different than Option A & C, it best accommodates the Board’s program needs, which includes providing 1,750 seats for staff. In this option, the addition has a larger floor plate than the other two options. The larger floor plate, combined with maintaining the alignment of building faces along C street, NW, requires the removal of the center wing of the existing FRB-East Building.

The applicant has indicated that providing natural light and views out is a cornerstone for employee wellness. Priority has been given to locate all staff workstations and offices with access to natural light, and with few exceptions, they fill all levels above grade. In order to accommodate the office program in FRB-East within five stories, much of the employee amenity and support program is located in the concourse levels below grade. This program includes a cafeteria, a central conference and training facility, and a fitness center.

The removal of the center wing of FRB-East has the added benefit of creating an appropriately scaled atrium between the historic building and the new addition. The atrium provides natural light for all office levels as well as the cafeteria at the bottom level. This atrium and the new atrium in the east courtyard of the Eccles Building anchor both ends of the pedestrian tunnel, connect the historic buildings under 20th Street, and allow natural light into the below grade levels. Below is a more detailed description of each of the options.

Option B – Preferred

The applicant has indicated that Option B is their preferred option under the concept review.

Option B- Eccles Building:

The existing building will be modernized, and high-character spaces, features, and materials will be preserved to the greatest extent possible. The exterior of the historic building will be restored and upgraded for security. Five (5)-story infill additions will be constructed on the east and west sides of the building that will connect the existing north and south wings. A rooftop addition will be constructed on the north wing that will connect with the east and west infill additions. The east and west exterior courtyards will be converted into atriums, with the east atrium becoming an entrance to the Eccles Building for staff and VIPs. The east atrium will also contain vertical circulation connecting the C-1 (entrance) level up to the first floor and down to the C-2 level where the existing tunnel between the Eccles Building and the Martin Building is located and new tunnel between the Eccles Building and FRB-East Building will be located. The existing laylight over the center wing/Grand Stair will be restored. The 1977 fifth floor office addition will be partially removed and a new skylight at the roof level of the fourth floor will be installed (restoring a condition similar to that of the original building prior to previous alterations). The addition will expand the C2 level under the existing building and courtyards allowing for additional program below grade. All existing systems within the building will be completely replaced. The existing Governors’ parking in the Eccles Building will be converted into program space.
Eccles Landscape:
The existing landscape will be rehabilitated to improve accessibility, perimeter security, and parking. The security booths on the south plaza will be replaced. A new east building entrance will include an entry plaza with stairs flanked by ramps centered on the new lobby space. A new west building entrance will include a paved plaza. Universally accessible routes will be created in four locations associated with the Eccles Building. These include: 1) a sloped walk from the 20th Street, NW sidewalk (at SE property corner) to the west to the level of the existing lawn terrace; 2) a sloped walk from the 21st Street, NW sidewalk (at SW property corner) to the east to the level of the existing lawn terrace; 3) driveway from 21st Street, NW into the west garage entrance; 4) sidewalks adjacent to the driveway at the 20th Street, NW east garage entrance. Universal accessibility to the south terrace fountains will be studied and explored.

Option B FRB-East Building:
The center wing of the existing building will be removed. Except for the center wing, the existing building will be modernized, and high-character spaces, features, and materials will be preserved to the greatest extent possible. The exterior of the historic building will be restored and upgraded for security. A major addition that is five (5) levels above grade and four (4) levels below grade will be constructed on the north side of the existing building. An atrium will be constructed between the existing building and the new addition. The lower levels of the atrium will house amenity functions for the board and will include a cafeteria and conference space. A loading dock will be constructed in the FRB-East Building and will serve the FRB-East Building, the Eccles Building, and the Martin Building and will connect the buildings by a below-grade service tunnel. A parking garage will be constructed below the south lawn of the FRB-East Building and 20th Street, NW. The entrance ramp will be integrated into the historic terrace on 19th Street, NW. The exit ramp will be within the landscape between the historic terrace on 20th Street, NW and the sidewalk. The total parking will include 577 spaces.

FRB-East Landscape:
The existing landscape will be rehabilitated to improve accessibility, perimeter security, and parking. A new paved plaza entrance will be added at the northwest corner of the new building addition (20th Street, NW entrance). The plaza includes stairs, a ramp, and two linear water features. Universally accessible routes will be created in three locations associated with the FRB-East Building. These include: 1) a sloped walk from the 19th Street, NW sidewalk (at SE property corner) to the west to the level of the lawn terrace; 2) a sloped walk from the 20th Street, NW sidewalk (at SW property corner) to the east to the level of the lawn terrace; 3) a ramp will be added at the West side terrace. A new underground parking garage will be added below the south lawn of the FRB-East Building and 20th Street, NW. To the extent possible, Special and Heritage Trees will be protected. New trees will be planted to replace removed trees. Vehicular entrances into the below-grade parking garage will be added under the east historic terrace of the building along 19th Street, NW and outside the limit of the historic terrace on the west side of the building along 20th Street, NW. Service functions will occur in the northeast corner of the FRB-East Building and share a screening checkpoint with Board staff and Governors vehicles at 19th Street, NW.
Option A

This option will retain the FRB-East Building’s center wing. Consequently, the addition’s floor plate will be smaller. Although the addition to the FRB-East Building is larger with six (6) floors, it does not meet the Board’s program to house 1,750 seats, falling about 180 seats short. The landscape design closely echoes that of Option B, with changes limited to those associated with vehicular circulation and parking.

Option A- Eccles Building:

An auditorium will be placed under a newly excavated west courtyard with medium sized conference rooms being placed on the concourse level of the center wing. Only the east courtyard will be converted into an atrium. The courtyards will be excavated down to the C3 level. Most of this level will be dedicated to mechanical space for air handling units.

Eccles Landscape:

The Governors’ parking will be maintained in its current location. As a consequence, the west courtyard will remain open to vehicles coming and going to the secure parking, and the courtyard will remain open. The vehicular ramp on the west side of the building will be maintained and a new wedge barrier, security booth, and paths on both the north and south sides of the ramp will be installed.

Option A- FRB-East Building:

An addition that is six (6) stories above grade and three levels below grade will be constructed on the north side of the building. The center wing of the building will be retained. The ground will be excavated under the wing for program space. Since the structure needs be underpinned for the center wing, the whole room will be raised in elevation by 2’ – 8” to match Level 1 of the existing building. Parking will be restricted to a parking garage below the south lawn of the FRB-East Building and will not extend under 20th Street, NW. Consequently, at 243 spaces it will have 334 fewer parking spaces.

FRB-East Landscape:

In order to accommodate the ramps in and out of the new garage, the entire length of the historic terraces on the east and west sides will be demolished. Materials will be carefully removed and cataloged, and the terraces will be rebuilt above the ramp. Due to the requirement to save three (3) Heritage Trees on the south lawn, the footprint of the garage will be narrow and four (4) levels below grade.
Option C

This option will retain the center wing in the FRB-East Building in its entirety. Parking will be located under the addition instead of the south lawn. Although the addition to the FRB-East Building is larger than the other options at seven (7) floors above grade, it will not meet the Board’s program needs. This is primarily due to parking below the addition and the subsequent need to push amenity program up into floors above. The landscape design closely echoes that of Option B, with changes limited to those associated with vehicular circulation, parking, and the design of the south lawn of the FRB-East Building. The differences between Option C and Option B (preferred) are listed below.

Option C – Eccles Building:

Only the east courtyard will be converted into an atrium. The courtyards will be excavated down to the C3 level. Most of this level will be dedicated to mechanical space for air handling units. The existing Governors’ parking in the Eccles Building will be converted into program space.

Eccles Landscape:

The vehicular ramp on the west side of Eccles will be maintained and a new wedge barrier, security booth, and paths on both the north and south sides of the ramp will be installed.

FRB-East Building:

The center wing will be maintained in its entirety. An addition 7 levels above grade will be constructed on the north side of the building. The two exterior courtyards formed by the existing building and the new addition will become atriums; both courtyards are excavated to house MEP equipment. To minimize the impact of a service tunnel on parking, a loading dock will be constructed on the west side of the addition and the entrance to the building will be located on the east side of the addition. The cafeteria will be located on Level 6 of the addition instead of in the atrium. The penthouse will be larger in this option to accommodate some of the air handling units. Parking will be located on four (4) levels under the FRB-East Building addition. Of the three options, this option at 194 spaces will have less parking than the other two. Due to the placement of parking under the addition, the project will not have space for fitness, space for training, or centralized conference space. Program space under 20th Street, NW will be limited to the pedestrian, service, and utility tunnels.

FRB-East Landscape:

No garage ramp will exist on the exterior of the existing building in Option C since parking will be located in the new addition. The terraces will be rebuilt with stairs, as parking garage ramps occur within the building and not under the terraces in this option. With parking located in the addition, the existing landscape of the south lawn will be rehabilitated following the Secretary of Interior Standards. New walls will be constructed adjacent to the existing stair nearest to Constitution Avenue to act as perimeter security. Where the proposed walls meet the stairs, bollards will be utilized to maintain pedestrian circulation. The new entrance to the building will be located on the northeast corner of the addition and will include a ramp and stair. In lieu of
rectilinear water features at the southern lawn terrace, plant beds will be incorporated into the central space surrounded by walks at the east and west ends.

**Eccles Building Massing Options**

Therefore, staff recommends that the Commission notes that for the Eccles Building, all three options:

- Construct a five-story infill addition on the east and west sides of the building that will connect the existing north and south wings.
- Construct a rooftop addition on the north wing that will connect with the east and west infill additions.

In addition, staff recommends the Commission notes the following with regard to the east and west exterior courtyards:

- Options A and C cover the east courtyard and convert it into an atrium, while the west courtyard will remain open.
- Option B covers the east and west exterior courtyards (creating atriums), with the east atrium becoming an entrance to the Eccles Building for staff and VIPs.

Staff also recommends the Commission finds that the east and west side additions are designed to be set back from the existing wings, allowing for the additions to be perceived as compatible and non-historic, and recommends that the applicant continue to explore ways to remove the penthouse additions on the south side of the Eccles Building, to minimize impacts to the historic views towards the Eccles Building.

**FRB-East Building Massing Options**

Staff recommends that the Commission notes the following massing differences among Option A-C for the FRB-East Building:

- Option A includes a six-story addition above grade and retains the FRB-East Building’s center wing; however, it does not meet the Board’s program to house 1,750 seats, falling about 180 seats short.
- Option B includes a five-story addition above grade and removes the center wing of the existing building. It maintains the alignment of building faces along C Street, while providing 1,750 seats for staff.
- Option C includes a seven-story addition and retains the center wing.

Furthermore, staff recommends the Commission finds that five-story height of the addition to FRB-East compliment the scale of the historic building, and the Eccles Building across the street. The addition would also not be highly visible from the National Mall on the south side of Constitution Avenue.

Staff recommends that the Commission does not support the taller massing of Alternatives A and C because, while they preserve the historic center wing, the proposed addition to the FRB-East Building is not compatible to the building and the historic context, and is not in keeping with the Secretary of the Interior’s Standards for Rehabilitation concerning guidance for additions to
historic buildings. In addition, staff recommends the Commission requests that applicant explore opportunities to reduce the height of the penthouses on FRB-East to minimize any visual impacts.

**Parking and Transportation**

Staff recommends the Commission advises that, regardless of the option selected, the project is located in an area of the District with a 1:5 parking ratio under NCPC’s current parking guidance, which will be determined based upon the proposed campus population. Staff also recommends that the Commission notes the following known parking differences among the alternatives for this submission:

- Option A proposes a new underground parking garage below the south lawn of the FRB-East Building (no extension under 20th Street, NW), with 243 new parking spaces. The existing parking garage at the Eccles Building would remain, and would be accessed through the west courtyard.
- Option B proposes a new underground parking garage below the south lawn of the FRB-East Building and 20th Street, NW, with 577 parking spaces, but eliminates the existing parking garage at the Eccles Building. The west courtyard would be enclosed as an atrium, and the curb cut would be closed on 21st Street, NW.
- Option C proposes a new underground parking garage of four levels, below the addition of the FRB-East Building instead of the south lawn, with 194 parking spaces. The existing parking garage at the Eccles Building would remain, and would be accessed through the west courtyard.

Furthermore, staff recommends that the Commission notes that the concept submission does not provide the number of expected Board employees for the entire campus nor does it include the number of parking spaces at the Martin and Eccles Buildings. Therefore, the proposed parking ratio is unknown for this review. Staff also recommends that the Commission notes the options reflect a range in total parking without explanation for the different amounts.

Staff also recommends that Commission finds that the amount and location of parking will have an impact on the overall design of the FRB-East building and possibly the Eccles Building, as well as impact the function of the transportation network. In addition, staff recommends the Commission supports the least amount of parking as possible given the campus’ access to the Farragut West and Foggy Bottom Metro Stations, as well as other modes of transportation in downtown Washington, DC; and requests the Board consider options that minimize parking, in consideration of NCPC’s parking guidance, potential impacts to the transportation network, and possible effects on the buildings’ landscapes.

Staff recommends that the Commission requests the Board submit a thorough Transportation Management Plan (TMP) as part of the Environmental Assessment, and include the number of expected Federal Reserve Board employees anticipated to be housed in Eccles, FRB-East, and Martin Buildings, summary of employee means of commuting, and locations of employee commutes.
General Comments

Staff recommends the Commission supports the applicant’s intent to preserve heritage trees and other landscape features in the front lawns of the Eccles and FRB-East Buildings, and supports the applicant’s intent to provide universal accessibility to both the Eccles and FRB-East Buildings from Constitution Avenue.

As the applicant continues to develop the preferred Option, staff recommends that the Commission requests additional information for the next submission, including:

- Elevations and renderings showing the exterior design treatments for both the Eccles and FRB-East Buildings additions
- Additional massing options for the Eccles buildings related to the penthouse additions, particularly on the south side
- Landscaping for both buildings
- Site lighting, signage, and wayfinding
- Perimeter security
- Tree removal and replacement locations
- Public accessibility on the site, especially the lawn and open space fronting Constitution Avenue

Staff requests that the Commission notes that a Section 106 Memorandum of Agreement will be executed to address agreed-upon mitigation measures commensurate with adverse effects resulting from the project, and also notes that the Federal Reserve Board is preparing an Environmental Assessment which will be released prior to submission for Preliminary Review in 2020.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

Staff analyzed this project using guidance in the Comprehensive Plan, particularly those related to five of the federal Elements of the Comprehensive Plan: the Federal Workplace, Transportation, Parks and Open Space, Federal Environment, and Preservation and Historic Features elements. In summary, staff finds it to be in conformance with the goals and policies associated with each Element.

National Historic Preservation Act

Both the Federal Reserve Board and NCPC have individual responsibility to comply with Section 106 of the National Historic Preservation Act (NHPA). At the concept review, Section 106 does not have to be completed, but initiated. To meet their compliance with Section 106, the Board has initiated the Section 106 process, and has held two Consulting Parties meetings to date, and anticipates the process to be concluded with a MOA, to provide commensurate mitigation for
expected adverse effects. NCPC has designated the Board the lead in Section 106, and intends to meet its individual Section 106 responsibilities by signing the MOA.

**National Environmental Policy Act**

Both the Federal Reserve Board and NCPC have individual responsibility to comply with the National Environmental Policy Act (NEPA). At the concept review, NEPA is not required to be completed. To meet their compliance for the NEPA, the Board is preparing an EA which will include a Transportation Management Plan. NCPC is a cooperating agency on the EA.

**CONSULTATION**

**Coordinating Committee**

The Committee forwarded the proposed comments on concept plans to the Commission. The Office of Planning and the DC State Historic Preservation Office stated they were not coordinating, noting that further Section 106 consultation is required. The District Department of Transportation (DDOT) stated they did not coordinate, noting concerns regarding continued public use of 20th Street, the loading configuration for the Eccles Building on 20th Street, the proposed amount of parking, and the use of underground parking under public spaces and streets. The Committee encouraged the applicant to develop innovative, seamless security solutions.

**U.S. Commission of Fine Arts**

The U.S. Commission of Fine Arts (CFA) received an information presentation for the concept for the Federal Reserve Board Building Project at their November 21, 2019 meeting.

**ONLINE REFERENCE**

The following supporting documents for this project are available online at [www.ncpc.gov](http://www.ncpc.gov):

- Submission Package

Prepared by Lee Webb
11/22/2019

**POWERPOINT (ATTACHED)**
Federal Reserve Board Building Project

1951 Constitution Avenue, NW, Washington DC

Approval of Comments on Concept Plans

Board of Governors of the Federal Reserve System
Site Location
Project Location on Constitution Avenue
Project Area Description

1.4 AREA DESCRIPTION
The project area is located in the Foggy Bottom neighborhood of Northwest Washington, DC. Both buildings face south on Constitution Avenue NW, across from the National Mall. The Eccles Building occupies the entire block bounded by 21st Street NW on the west, 20th Street NW on the east, and C Street NW on the north. Directly to the east, the FRB-East Building sits on an entire block bounded by 20th Street NW to the west, 19th Street NW to the east, and C Street NW to the north. Completed in the 1930s, both buildings stand prominently within a group of monumental buildings along Constitution Avenue NW that frame the Lincoln Memorial to the southwest.

Located directly to the north of the Eccles Building and northwest of the FRB-East Building is the Board's William McChesney Martin, Jr. Building, which was completed and dedicated in 1974. The Martin Building will become the primary entrance point and security screening area for employees of the Martin, Eccles, and FRB-East buildings.

1.5 BUILDING AREA & SITE COVERAGE
The approximate existing gross site and building areas are listed below.

**ECCLES BUILDING**
Gross Building Area: 276,000 square feet
Gross Site Area: 4.16 acres (171,671 square feet)

**FRB-EAST BUILDING**
Gross Building Area: 126,500 square feet
Gross Site Area: 3.18 acres (138,812 square feet)
Eccles Building Chronology

1935
Architect Paul Philippe Cret wins the competition for the Federal Reserve Board Building
Building construction begins

1937
Federal Reserve Board of Governors moves into the building

1940

1950

1960
Listed in the DC Inventory of Historic Sites

1970

1977
Last major building renovation

1980

1982
Building named after Marriner S. Eccles (1890–1977), Chairman of the Federal Reserve under President Roosevelt
FRB East Building Chronology

1930 - 1931
Building designed by Jules Henri de Sibour

1931
Building construction begins

1933
US Public Health Service moves into the building

1942 - 1946
President Roosevelt selects the building to house the offices of the Combined Chiefs of Staff and the Joint Chiefs of Staff

1947 - 1953
Atomic Energy Commission occupies building

1954
The National Science Foundation buys the building

1972
Protesters from the American Indian Movement occupy the building

2007
Listed in the National Register of Historic Places

2010
Federal Reserve Board acquires the building

2017
Department of interior vacates the building

2018
Federal Reserve Board acquires the building
Flood Plans and Stormwater Management

National Flood Hazard Layer FIRMette

Legend

Flood Plans
The Eccles and FRB-East buildings are outside, but immediately adjacent to, the 100-year (1% Annual Chance) flood plan and the 500-year (0.2% Annual Chance) Flood Hazard Area. This project does not impact a wetlands area.

Stormwater Management
Currently, both sites generally have little uncontrolled stormwater surface runoff due to comprehensive collection and conveyance structures. At the Eccles building, this includes a rooftop inlet collection connected to the building’s plumbing system: ground surface inlets connected to the building’s plumbing system; and a French drain and sump inlet network serving the vegetative grounds connected to the building’s plumbing system. At the FRB-East Building, most of the impervious surface runoff on the site is collected by a rooftop inlet collection and downspouts connected to the building’s plumbing system, area storm drain inlets collected to the building’s plumbing system; and parking lot area drain inlets connected to the building’s plumbing system. Both properties do not currently have a stormwater management program in place.

DOEE requires all major regulated projects to comply with current Stormwater Management (SWM) retention requirements pursuant to Chapter 5 of Title 21 of the District of Columbia Municipal Regulations (DCMR). This project will trigger requirements of a Major Substantial Improvement (MSI) activity, a Major Land Disturbing (MLD) activity, and a Minor Substantial Improvement (MSI) compliance process for improvements within the public right-of-way. The project will be considered a major regulated project by DOEE.
Eccles Building Existing Conditions, Constitution Avenue
Project Context Photo Key
Existing Photos

1. Constitution Ave View East
2. Eccles Building NW View
3. Eccles Building East Facade
4. Eccles Building Fountain
5. Eccles Building South Facade
6. C St West View
Existing Photos
Existing Photos
2.3 LANDSCAPE

EXISTING SITE PLAN

Landscape
Existing Site Analysis
Existing Site Grading
Existing Building Height Context
Eccles Building Existing Conditions

2.4 ECCLES BUILDING
EXISTING CONDITION PHOTOGRAPHS

South Façade
East Courtyard Entry
Courtyard Fountain
East Courtyard
Eccles Building Existing Conditions

East Facade

Vaulted Corridor, Level 2

Board Room

Monumental Star Hall
Eccles Building Existing Floorplans
Eccles Building Existing Floorplans
Eccles Existing North/South Section
FRB East Building Existing Conditions
FRB East Building Existing Conditions
FRB East Building Existing Floorplans
FRB East Building Existing Floorplans
## Concept Options Summary

<table>
<thead>
<tr>
<th>Option</th>
<th>Location</th>
<th>Parking Entrance</th>
<th>Parking Exit</th>
<th>Ventilation &amp; Emergency Exits</th>
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<tbody>
<tr>
<td>A</td>
<td>FRB-East South Lawn</td>
<td>191 St - Terrace End</td>
<td>20th St - Terrace End</td>
<td>Concealed within areaway</td>
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<tr>
<td>B (Preferred)</td>
<td>FRB-East South Lawn/20th St</td>
<td>191 St - Under Addition</td>
<td>20th St - Mid Terrace</td>
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<td>C</td>
<td>Under FRB-East Addition</td>
<td>191 St - Under Addition</td>
<td>20th St - Under Addition</td>
<td>Within Addition</td>
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</table>

### ECCLES
- East Courtyard Covered: Yes
- West Courtyard Covered: No
- N/S Links Softback: 5'
- Historic Fountains: Preserved
- Gate & Entry Walls to the Courtyards: Removed
- Governors Parking: Maintained in Location

### FEDERAL RESERVE BOARD-EAST
- Height of Addition: 6 Levels + PH
- Center Wing: Preserved and Raised
- Octagon & Historic Lobby: Preserved

### POPULATION
- Program Requirement: 1,750 Seats
- (183)

### PARKING
- Location: FRB-East South Lawn/20th St
- Parking Entrance: 191 St - Terrace End
- Parking Exit: 20th St - Mid Terrace
- Ventilation & Emergency Exits: Concealed within areaway

### File: 8113
Massing

The north face of the new addition to the FED East Building will align with the north face of the adjacent National Academy of Sciences.
Currently, the Eccles and Martin Building are connected by a tunnel located under C Street. This is an important and actively used connection. Critical to the operation of the Federal Reserve Board is the connection of Eccles to FDR East under 31st Street. The pedestrian tunnel connection will facilitate communication, permitting staff and external visitors to move freely between buildings without having to go through security screening at each building. The tunnel network is a newly created atrium space within the Eccles East Courtyard which becomes the hub, or fulcrum, for the 3 Buildings. A new enclosed entry for staff and VIP visitors allows entry into the space at grade level and a new monumental stair within the atrium provides a connection from the entry to Paul Crot’s existing, monumental, monumental stair and new pedestrian tunnel below.
The Eccles East Courtyard conversion into an atrium will disrupt the service functions that are currently located within that space. The Martin building does not have an adequate building clock to serve the three buildings. Therefore, FFR-East will become the new central escalator point for Eccles, Martin and FRR-East. FFR-East will also include centralized MEP equipment that serves both FFR-East and the Eccles buildings. A new service and utility tunnel will connect Eccles and FRR-East together and tie into the existing utility tunnel between Eccles and Martin.

WARRANTS 5. ECCLES BUILDING AND FEDERAL RESERVE BOARD EAST BUILDING NATIONAL CAPITAL PLANNING COMMISSION

CONCEPT REVIEW SUBMISSION
Preferred Option B
# Preferred Option B

## OPTION B (PREFERRED OPTION)

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<td>Height of Addition</td>
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<td>Octagon &amp; Historic Lobby</td>
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Preferred Option B Landscape
Preferred Option B Eccles Landscape Concept
Preferred Option N FRB-East Building Landscape Concept
Preferred Option B Site Security Program
Preferred Option B Grading
Preferred Option B Plans
Preferred Option B Plans
Preferred Option B Plans
FRB East Building Sections Preferred Option B
Preferred Option B Section
Preferred Option B Perspective
Preferred Option B Perspective
Preferred Option B Perspective
Preferred Option B Perspective
OPTION A

ECCLES
- East Courtyard Covered: Yes
- West Courtyard Covered: No
- N/S Links Setback - Foot: 5'
- Historic Fountains: Preserved
- Gate & Entry Walls to the Courtyards: Removed
- Governors Parking: Maintained in Location

FEDERAL RESERVE BOARD-EAST
- Height of Addition: 6 Levels + PH
- Center Wing: Preserved and Raised
- Octagon & Historic Lobby: Preserved

POPULATION
- Program Requirement - 1,750 Seats: (183)

PARKING
- Location: FRB-East South Lawn
- Parking Entrance: 19th St - Terrace End
- Parking Exit: 20th St - Terrace End
- Ventilation & Emergency Exits: Concealed within areaway
Option A Landscape
Option A Grading
Option A Floorplans
Option A Floorplans
Option A Floorplans
Option A Floorplans
Option A Perspective
Option A Perspective
Option A Perspective
Option A Perspective
Option A Perspective
Option A Perspective
Option C
**OPTION C**

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**CONCEPT REVIEW SUBMISSION**

File: 8113
Option C Landscape
Option C Site Security
Option C Grading
Option C Floorplans
Option C Floorplans
Option C Floorplans
Option C Floorplans
Option C Section
Option C Section
Option C Perspective
Option C Perspective

Perspective from 20th St and Constitution Ave, Option C
Option C Perspective
Option C Perspective
Option C Perspective
Option C Perspective
Dear Ms. Varnon:

In its meeting of 21 November, the Commission of Fine Arts was pleased to hear an information presentation on plans for the renovation and expansion of the Marriner S. Eccles Building (2051 Constitution Avenue, NW) and the Federal Reserve Board-East Building (the former Interior South Building, located at 1951 Constitution Avenue, NW). The Commission expressed general support for the plan to add to these two significant historic buildings and to alter their associated landscapes, as shown in the preferred Option B, and provided the following comments.

In their discussion of the presented alternatives, the Commission members found that the proposed massing for the new additions is the most important issue when considering the project, with the expectation that a suitable architectural treatment will be developed for the selected massing. They expressed support for the project’s goals related to the health and well-being of employees, including the ample use of daylight for work and cafeteria spaces within the renovated buildings; they also encouraged continuation of programs that support employee use of public transportation and cycling, with the goal of reducing the number of underground parking spaces envisioned for the two buildings. They expressed support for the exploration of opening to the public the broad, formal landscapes along Constitution Avenue, commenting that the fountains are particularly beautiful elements within these spaces adjacent to the National Mall. They also advised coordinating with other streetscape and perimeter security improvement projects in the area to prevent a discordant treatment of the public realm within the institutional and monumental context of the Northwest Rectangle.

The Commission looks forward to review of the project when it is submitted at the concept level. As always, the staff is available to assist you.

Sincerely,

Thomas E. Luebke, FAIA
Secretary

Winona Varnon
Director, Management Division
Board of Governors of the Federal Reserve System
Washington, DC 20551

cc: Rod Henderer, Fortus (Callison-RTKL)
Tom Jester, Fortus (Quinn Evans Architects)
Alan Ward, Sasaki