Executive Director's Recommendation
Commission Meeting: October 1, 2020

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

NCPC FILE NUMBER
8113

NCPC MAP FILE NUMBER
1.34(38.00)45007

APPLICANT’S REQUEST
Approval of preliminary site and building plans

PROPOSED ACTION
Approval of preliminary site and building 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 National Capital Planning Commission (NCPC) last reviewed the project as a concept submission in December of 2019. The Board is now seeking preliminary approval from the Commission. At concept review, the Commission commented on several alternatives under consideration. The current submission for preliminary review includes more detailed plans for the preferred alternative in addition to a Transportation Management Plan and a commitment to NCPC’s Comprehensive Plan Parking ratio of 1 parking space for every 5 employees.

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 also under renovation. 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 consolidate 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 has prepared a draft Environmental Assessment including a Transportation Management
Plan, which is posted on NCPC’s website for public comments until October 12th. 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 four 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.

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**RECOMMENDATION**

The Commission:

**Approves** the preliminary site and building plans for the Federal Reserve Board Eccles and FRB-East Building renovation and expansion.

**Commends** the Board for fully engaging partner federal agencies and the Section 106 Consulting Parties through the evolution of the design process and for a thorough and responsive submission.

**Notes** the key elements that have changed since concept review in 2019 include development of the Eccles building infill, skylights, atriums and FRB-East building addition, the landscape plan, perimeter security and transportation management plan.

**Notes** the Section 106 and NEPA processes are ongoing and additional design developments may result from the evaluation of impacts after further consultation.

**Finds** the Board has successfully responded to the Commission’s previous comments and requests, as follows:

**Massing/Design**

**Finds** the design development of both buildings successfully responds to the existing architecture and creates additions and infills that are contemporary, yet compatible to the historic buildings, while exhibiting high quality civic design, appropriate for buildings located on Constitution Avenue.

**Notes** the Board has reduced the penthouse height and footprint on both buildings to limit visibility from Constitution Avenue and C Street.

**Finds** the skylight design for the Eccles building achieves a balance between minimizing views from Constitution Avenue and preserving the center pavilion’s character-defining features within the courtyards; however, there may be additional refinements that could further minimize its visibility from Constitution Avenue.
Requests the Board continue to use the Section 106 process to evaluate the scale of the skylight and impacts on views from Constitution Avenue.

Requests that if rooftop antennas are anticipated, the Board submit a rooftop antenna plan showing the height and location of future antennas with appropriate setbacks and screening so they are not visible from Constitution Avenue or the National Mall.

Transportation/Parking

Finds that following the Commission’s concept review, the Board has reduced the number of parking spaces at the FRB-East building from 536 to 318 to meet NCPC’s parking ratio of one parking space for every five employees for the campus.

Notes the NCPC parking ratio for this area increased to one space per every six employees with the recent adoption of the updated Transportation Element in July. The approved action stated that individual projects with previous Commission action under the 2016 policies (such as this one) would move forward using the 2016 Transportation Element.

Finds the Board has submitted a thorough Transportation Management Plan (TMP) with several transportation management plan strategies to continually improve upon the parking ratio.

Notes the parking for both buildings will be consolidated in 3 levels under the FRB-East building, the terrace lawn and 20th NW.

Notes the Board evaluated five possible locations for the for the entry and exit parking ramps at the FRB-East building.

Finds the proposed location of the entry ramp on 19th Street and the exit ramp on 20th Street results in the least amount of impact to the historic building by not altering the building and front lawn’s appearance from Constitution Avenue; however there are still outstanding issues with regard to the location of curb cuts and ramps that need to be resolved with the District.

Recommends the Board soften the hard edge of the wall between the sidewalk and the ramp with a landscape buffer.

Landscape/Tree Strategy

Notes the Board has completed a draft Cultural Landscape Report and Assessment of Effects, noting several character defining features of the landscapes for both buildings.

Notes the proposed building additions/renovations will necessitate changes to the landscape of both buildings.
Finds the Eccles landscape, designed by Paul Cret with a specific intent, should be retained as much as possible, while the FRB-East Landscape, historically less formal, can support new features and alterations.

Finds the proposed design for the Eccles landscape largely protects the character defining features of the site while improving circulation and stormwater management.

Finds that overall, the proposed landscape for the FRB-East building reflects the symmetry of the historic design, while addressing program needs related to creating a new main building entrance, improving universal accessibility, and addressing site security needs.

Notes additional refinements to the proposed landscape plan may occur during the 106 process to further minimize the loss or alteration of historic and character-defining landscape features.

Request the Board submit a tree re-planting plan, including size, type, and location, in accordance with NCPC’s Tree Replacement Policy.

Notes that 35 trees in the right-of-way will need to be removed for the perimeter security installation or because of poor health and the Board is committed to replant in accordance with all DDOT requirements.

Requests the Board continue to coordinate with the District Department of Transportation and the Public Space Committee.

Perimeter Security/Public Accessibility

Finds the Board proposes to replace the existing perimeter security system around the Eccles Building with a simpler/more elegant post and rail design in the same location as the existing bollard system.

Notes the Board proposes to replicate the same perimeter security design around the FRB-East building.

Finds that overall, the proposed design is an improvement from the existing oversized and tightly spaced bollards but that additional consultation is needed with the consulting parties.

Requests additional information and renderings for all of the guard booths.

Finds the perimeter security will not allow the public any access to the grounds and that the Board should consider public access to some of the grounds (such as the fountains or northwest plaza) and/or virtual tours of the buildings as potential mitigation in the Section 106 process.
National Park Service Property

Notes that construction related to the building addition of FRB-East will directly impact the National Park Service triangular shaped property to the north.

Notes the Board is proposing to make landscape, path, and sidewalk improvements as part of the overall project.

Requests the Board continue to coordinate all improvements with the National Park Service.

Lighting

Notes the Board has submitted an initial response to the Commission’s lighting request, noting that exterior lighting will be updated across the site, including lighting for the building façades, vehicular and pedestrian access, and the streetscape.

Requests the Board submit an exterior lighting plan/diagram for the grounds and building facades at final review.

Wayfinding

Notes the exterior signage will use contemporary materials and processes that respect the historic features of each building while creating a more unified appearance and signage system throughout the campus.

Supports the Board’s approach to signage and wayfinding and requests a more detailed wayfinding plan at final review.

General Comments

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.

Requests additional coordination with all consulting parties regarding the proposed design, landscape plan, lighting, and perimeter security.

Notes that the Federal Reserve Board has prepared a Draft Environmental Assessment which is available for public comment until October 12.

PROJECT REVIEW TIMELINE

<table>
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<th>Previous actions</th>
<th>Concept Review – December 2019</th>
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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 preliminary approval from the Commission. The key elements that have changed since concept review in 2019 include development of the Eccles building infill, skylights, atriums and FRB-East building addition, the landscape plan, perimeter security and transportation management plan. Staff finds that the Board has successfully responded to the Commission’s previous comments and requests related to design and massing, transportation, the landscape, wayfinding and lighting.

Staff analyzed this project using guidance in the Comprehensive Plan, particularly the federal elements related to the Federal Workplace, Transportation, Parks and Open Space, Federal Environment, and Preservation and Historic Features. In summary, staff finds it to be in conformance with the goals and policies associated with each element and therefore recommends that the Commission approves the preliminary site and building plans for the Federal Reserve Board Eccles and FRB-East Building renovation and expansion.

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. 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. They will consolidate their workforce into a campus that includes the following owned buildings: Eccles Building, FRB-East Building, 1709 New York Avenue Building, Martin Building.

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. They have convened the agency stakeholders often since the project began. The Board also initiated the Section 106 process in the summer of 2019 and has held four Section 106 Consulting Party meetings to date, to discuss the project and share the options. As
such, staff recommends the Commission **commends** the Board for fully engaging partner federal agencies and the Section 106 Consulting Parties through the evolution of the design process and for a thorough and responsive submission.

**Design and Massing**

Both the Eccles and FRB-East buildings will be modernized, and high-character spaces, features, and materials will be preserved to the greatest extent possible. The exterior of the historic buildings will be restored and upgraded for security. Specific changes to the buildings include:

**Eccles Building:**

- 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 down to the the existing tunnel between the Eccles Building and the Martin Building and a new tunnel between the Eccles Building and FRB-East Building. The existing skylight 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).
- All existing systems within the building will be completely replaced. The existing Governors’ parking in the Eccles Building will be converted into program space.

**FRB-East Building:**

- 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 318-space 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.
Since the Commission’s concept review in December, the applicant has advanced the design of several key project elements including the development of the infill, additions, and atriums of both buildings and the development of the levels below the south lawn of the East building and 20th Street. During concept review the Commission requested that the Board submit elevations and renderings showing the exterior design treatments for both the Eccles and FRB-East building additions as well as massing options for the Eccles buildings related to the penthouse additions, particularly on the south side. Specifically, the Commission recommended 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. In response, the Board has reduced the height and footprint from the concept review to reduce visibility from Constitution Avenue. They note that the penthouse cannot be removed entirely, as it extends the building’s existing egress stairs to the top floor (Level 05), providing a necessary means of egress for the building occupants.

NCPC also requested that the Board explore opportunities to reduce the height of the penthouse on the FRB-East Building to minimize any visual impacts. In response, the Board has reduced the penthouse footprint on the building by approximately 30%, reduced the overall height by two feet, and repositioned the penthouse to decrease its visual impact on C street.

The Board performed a viewshed analysis which shows the new penthouse addition and infill of the courtyards at the Eccles building are minimally visible from several key vantage points on the National Mall and Constitution Avenue. The proposed addition on the FRB-East building will be visible from vantage points to the east; however, the massing is compatible with nearby buildings including the National Academy of Sciences and the Pan American Annex. The Board will continue to use the Section 106 process to evaluate the scale of the skylight and impacts on views from Constitution Avenue. Staff requests that if rooftop antennas are anticipated, the Board submit a rooftop antenna plan showing the height and location of future antennas with appropriate setbacks and screening so they are not visible from the Constitution Avenue or the National Mall.

In terms of exterior design treatments, staff finds the design development of both buildings successfully responds to the existing architecture and creates additions and infills that are contemporary, yet compatible to the historic buildings, while exhibiting high quality civic design, appropriate for buildings located on Constitution Avenue. The glass infill proposed for the Eccles Building will maintain the original massing while connecting the existing wings. The infill additions are setback 15 feet from the main facades which helps the wings to appear as they did historically. The Board is proposing sculpted vertical bronze shading fins to provide solar control and reference the historic palette of decorative bronze of the existing building.

At the entry elevation on 20th Street, the existing site walls will be slightly widened and lowered to signal entry into the Eccles Building. The recess at the first floor will create a small forecourt between the infill and site walls and serve as the new threshold into the building. The historic gates will be displayed within the forecourt. The western site wall and gate will be maintained but modified to allow egress to the exterior from the west courtyard.
The addition to the FRB-East Building will respond to the existing architecture and also be clad in Georgia White marble. The new five-story addition aligns with the fifth floor of the Eccles Building. The mechanical penthouse has been minimized and placed to reduce views from Constitution Avenue. On the east and west sides, the fifth floor of the addition will align with the ridge lines of roofs on the FRB-East Building wings.

With the exception of the corners, the historic building has a consistent bay spacing of pilasters and window openings. The addition proposes diffused glazing (referencing the historic building’s pilasters) and similar window openings. Two-story high, 30-foot-tall openings, similar to the historic building, will be located between the pilasters to create a civic scale.

Therefore, staff recommends that the Commission:

**Finds** the design development of both buildings successfully responds to the existing architecture and creates additions and infills that are contemporary, yet compatible to the historic buildings, while exhibiting high quality civic design, appropriate for buildings located on Constitution Avenue.

**Notes** the Board has reduced the penthouse height and footprint on both buildings to limit visibility from Constitution Avenue and C Street.

**Finds** the skylight design for the Eccles building achieves a balance between minimizing views from Constitution Avenue and preserving the center pavilion’s character-defining features within the courtyards; however there may be additional refinements that could further minimize its visibility from Constitution Avenue.

**Requests** the Board continue to use the Section 106 process to evaluate the scale of the skylight and impacts on views from Constitution Avenue.

**Requests** that if rooftop antennas are anticipated, the Board submit a rooftop antenna plan showing the height and location of future antennas with appropriate setbacks and screening so they are not visible from the Constitution Avenue or the National Mall.

**Transportation/Parking**

All three of the Federal Reserve buildings are located within the NCPC Central Employment Area (CEA), which as defined in the Federal Workplace Element, is characterized by a wide variety of travel options, with a high concentration of transit services; bicycle infrastructure; and a walkable active street network. There are a variety of local transportation options near the site that serve vehicular, transit, walking, and cycling trips.

- The site is located 0.7 miles from both the Foggy Bottom-GWU and Farragut West Metrorail stations (served by the Blue, Orange, and Silver Lines).
• The Metrobus system provides local transit service in the vicinity of the site, including connections to several neighborhoods within the District and additional Metrorail stations. Several bus lines stop near the site, connecting employees with Arlington County in Virginia and suburban Maryland.
• There are several existing bicycle facilities near the site that connect to areas within the District. Directly adjacent to the site and running parallel to Constitution Avenue is a bicycle trail that runs the length of the National Mall. There are also two Capital Bikeshare stations adjacent to the site.

Within the CEA, the Federal Reserve is subject to NCPC’s 1:5 parking space per employee ratio. The NCPC parking ratio for this area increased to 1:6 with the recent adoption of the updated Transportation Element in July; however, this project continues to be subject to the 1:5 ratio because design development began over a year ago.

Currently the Board offers several Transportation Demand (TDM) strategies for its employees including:

• A robust shuttle bus program, which connects the Eccles Building to the Farragut West Metro station. The shuttle service operates during regular business hours.
• A monthly transit subsidy of $270.
• An alternative work schedule (AWS), where employees may either work four 10-hour days or work nine nine-hour days, resulting in one less day traveled to work on a weekday. Approximately 1,064 employees (32%) across the FRB’s existing locations in Washington, DC use an AWS.

According to survey data provided by FRB employees working at the Eccles, New York Avenue, International Square, and 1801 K Street locations, the existing drive alone mode share of FRB employees is 20%, which is considerably lower than that of employees in the immediate surroundings of the Eccles and 1951 site.

In response to preliminary comments provided by NCPC and the District Department of Transportation (DDOT), the FRB has decreased its proposed parking supply at the 1951 Building from 536 spaces to 318 spaces. With the lower parking supply, the overall project consists of 572 FRB employee parking spaces to serve the 2,835 employees that are projected to occupy the Eccles, FRB-East, and Martin Buildings, resulting in a 1:5 parking ratio. Table 1 provides a summary of the proposed parking supply and corresponding employee parking ratio.

| Table 1: Existing and Proposed Employee Seats, Parking Spaces, and Parking Ratios |
The NCPC parking ratio for this area increased to one space per every six employees with the recent adoption of the updated Transportation Element in July. The approved action stated that individual projects with previous Commission action under the 2016 policies (such as this one) would move forward using the 2016 Transportation Element.

The 318 parking spaces at the FRB-East building will be constructed on 3 levels below a portion of the South Terrance lawn and 20th Street. At concept review, the Board proposed using the 4th level below grade for the additional parking they were seeking. That space will now be repurposed and may hold law enforcement training and warehousing in the future. There will be no vehicular access to this space. The parking under the pedestrian tunnel of 20th Street will remain for governors, their security detail and the Board’s motor pool. This location provides a separated and secure parking location for the governors with direct access to an existing private elevator. This would replace their existing secure parking located beneath the south wing of Eccles on the C1 level. NCPC has jurisdiction over the use under the right-of-way; however, the Board must still coordinate all right-of-way improvements with the District Department of Transportation and Public Space Committee.

The Board evaluated 5 different locations for the entry and exit parking ramps at the FRB-East building. Staff finds that the proposed location at of the entry ramp on 19th Street and the exit ramp on 20th Street results in the least amount of impact to the historic building by not altering the building and front lawn’s appearance from Constitution Avenue; however there are still outstanding issues with regard to the location of curb cuts and ramps that need to be resolved with the District. One issue is that the wall that will be needed between the ramp and the sidewalk does not result in a pleasant experience for pedestrians. Therefore, staff recommends the Board add a landscape buffer along the wall to soften its appearance.

Moving forward, the Board will try to improve its 1:5 parking ratio by offering all of the existing TDM strategies listed above in addition to:

- Providing long-term bicycle parking spaces in the proposed garage to serve 7% of all building occupants.
- Providing short-term bicycle parking spaces on exterior racks to serve 3% of all peak visitors. Two rack locations are proposed – one at the corner of 21st Street and C Street and one at the corner of 19th Street and Virginia Avenue.
- Making use of MWCOG’s Commuter Connections Program, which includes the Ridematching and the Guaranteed Ride Home programs, among other services.
- Coordinating with DDOT’s goDCgo program, which is an initiative of the District Department of Transportation (DDOT) that encourages the use of sustainable transportation and provides complimentary transit resources and consulting services to DC organizations and commuters.

Therefore, staff recommends that the Commission:

**Finds** that following the Commission’s concept review, the Board has reduced the number of parking spaces at the FRB-East building from 536 to 318 to meet NCPC’s parking ratio of one parking space for every five employees for the campus.

**Notes** the NCPC parking ratio for this area increased to one space per every six employees with the recent adoption of the updated Transportation Element in July. The approved action stated that individual projects with previous Commission action under the 2016 policies (such as this one) would move forward using the 2016 Transportation Element.

**Finds** the Board has submitted a thorough Transportation Management Plan (TMP) with several transportation management plan strategies to continually improve upon the parking ratio.

**Notes** the parking for both buildings will be consolidated in 3 levels under the FRB-East building, the terrace lawn and 20th NW.

**Notes** the Board evaluated five possible locations for the for the entry and exit parking ramps at the FRB-East building.

**Finds** the proposed location of the entry ramp on 19th Street and the exit ramp on 20th Street results in the least amount of impact to the historic building by not altering the building and front lawn’s appearance from Constitution Avenue; however there are still outstanding issues with regard to the location of curb cuts and ramps that need to be resolved with the District.

**Recommends** the Board soften the hard edge of the wall between the sidewalk and the ramp with a landscape buffer.

**Landscape/Tree Strategy**

The applicant has also submitted new information regarding the landscape design, universal accessibility, and overall tree removal/preservation strategy. They also recently completed a draft Cultural Landscape Report. Character defining features of the Eccles and FRB-East landscapes include elements of their spatial organization, circulation, views, vegetation, and small-scale features (such as fountains, marble benches, etc.).
Eccles Landscape:

The project will preserve some landscape character-defining features of the Eccles Building landscape while rehabilitating circulation to create universally accessible routes, improving perimeter security (described in the perimeter security section), modifying the east and west courtyards, and a portion of the fountain gardens. The proposed design retains a symmetrical site layout with gardens on each side of a central walk leading up a flight of steps to the elevated front gardens. Pathways will provide access to the lawn and garden terrace from the southwest and southeast corners with new sloped walks. The two fountain gardens will both be accessible by sloped walks from the south that will remove existing stairs.

Portions of the east fountain garden will have to be removed and rebuilt due to the extent of underground work. Both fountains will undergo repair work. A bioretention area is proposed south of the marble walkway in place of the row of magnolias that will be removed to help satisfy stormwater requirements. The magnolias are not a character defining feature of the landscape. Bioretention areas will be located a minimum of 10 feet from the west and south sides of the Eccles Building. An evergreen hedge will be installed surrounding the bioretention areas to maintain consistency with the historic views from Constitution Avenue.

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 is proposed below the south lawn of the FRB-East Building and 20th Street, NW. Vehicular entrances into the below-grade parking garage will be added under the east historic terrace of the building along 19th Street, NV 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, NV.

FRB-East Building Entry and Gardens Terrace

A new sunken outdoor terrace in the northwest corner of the site for employee use, adjacent to the entry, will help activate the corner of 20th Street and C Street. The terrace will have movable furniture and will be bordered by a linear water feature on the north side that faces south toward the glazed lobby space.

The South Garden Terrace sits above a new underground parking garage. Much of the existing garden terrace within the limit of the new garage will be completely demolished and reconstructed.
Some modifications are required due to the existing garage ramps and utility routing. An accessible route will be provided by creating a sloped walk/ramp at the SE and SW corners of the site to get up to the existing garden terrace elevation. Walkways will occur on the north and south sides of the lawn to provide continuous pedestrian access to the central walk into the garden spaces. The historic Wheelwright and Stevenson landscape plans included twin fountains, however they were never constructed. In the spirit of the historic design two new water features are proposed in the garden spaces on either side of the lawn. New large tree plantings will be installed in the garden areas to replace the trees bosque that was removed.

Circulation, Sidewalks, and Streetscape

Primary pedestrian access to the Eccles Building will take place from 20th Street NW. Primary visitor access to the Eccles Building will take place from the Martin Building directly to the north. An underground pedestrian tunnel will connect the Eccles and FRB-East Buildings, joining the existing tunnel that connects the Eccles Building and Martin Buildings.

20th Street NW will be completely removed and replaced between Constitution Avenue and C Street to make way for the underground garage and tunnel construction. A new raised mid-block crossing on 20th Street NW will connect the main entrance of the Eccles Building with the main entrance of the FRB-East Building. A precedent for this approach exists between the Martin Building and the Eccles Building on C Street NW.

The streetscape and sidewalks will be completely removed and replaced. To meet current DDOT standards, the entirety of 20th Street curbs and drainage will be demolished and completely rebuilt. Street tree replacement in the right-of-way will follow DDOT requirements. Removal and replacement of bollards will require the replacement of 35 street trees with the exception of very large trees along Constitution Avenue. Street trees not along Constitution Avenue will be replaced with 5- to 6-inch caliper trees. Large elm trees along Constitution Avenue that are not in good condition will be removed and replaced with 10- to 12-inch caliper trees. Minimum DDOT street tree soil volumes will be met or exceeded by providing structural soil or other suspended pavement systems if required in selected areas. Trees in the right-of-way will be under drained, irrigated, and include aeration systems.

Trees/Vegetation

The proposed planting design will include plants selected to thrive in the local/regional site conditions and to increase species diversity while retaining the character of the significant historic landscape. Native plants will be utilized whenever possible. There are several trees on the site that would classify as Special or Heritage trees per the District’s standards. The design includes a tree preservation strategy that will seek to protect as many healthy existing trees as possible; however, a specific tree replacement plan (size and type) is still under development.

Therefore, it is staff’s recommendation that the Commission:
Notes the Board has completed a draft Cultural Landscape Report and Assessment of Effects, noting several character defining features of the landscapes for both buildings.

Notes the proposed building additions/renovations will necessitate changes to the landscape of both buildings.

Finds the Eccles landscape, designed by Paul Cret with a specific intent, should be retained as much as possible, while the FRB-East Landscape, historically less formal, can support new features and alterations.

Finds the proposed design for the Eccles landscape largely protects the character defining features of the site while improving circulation and stormwater management.

Finds that overall, the proposed landscape for the FRB-East building reflects the symmetry of the historic design, while addressing program needs related to creating a new main building entrance, improving universal accessibility, and addressing site security needs.

Notes additional refinements to the proposed landscape plan may occur during the 106 process to further minimize the loss or alteration of historic and character-defining landscape features.

Request the Board submit a tree re-planting plan, including size, type, and location, in accordance with NCPC’s Tree Replacement Policy.

Notes that 35 trees in the right-of-way will need to be removed for the perimeter security installation or because of poor health and the Board is committed to replant in accordance with all DDOT requirements.

Requests the Board continue to coordinate with the District Department of Transportation and the Public Space Committee.

**Perimeter Security/Public Accessibility**

The existing bronze-clad perimeter security system around the Eccles Building will be replaced by a cable rail system similar to the one installed at the Department of Commerce. The Eccles building has an International Security Committee (ISC) rating of level 5 because it is the official headquarters building. The Board proposes the same cable rail system for the FRB-East building, which has an ISC rating of level 4. Currently, the building does not have perimeter security. The proposed perimeter security elements will be consistent for both buildings and simplify the alignment, consisting of either a post-and-rail system with an internal cable located in planting areas, or simpler individual bollards in paving at entry locations or where pedestrian circulation is required. The intent is to maximize the spacing between the posts and to simply cover the cables between the posts, significantly reducing the visual impact compared to traditional bollards spaced at about 4- to 5-feet apart. All bollards surrounding the buildings will be bronze. In front of the Eccles Building along Constitution Avenue, the existing marble walls will be retained in place and
serve as anti-ram knee walls. At the FRB-East Building along Constitution Avenue, the post-and rail-system will be setback about 15 feet from the north side of the sidewalk.

New air-conditioned guard booths will be provided to replace the existing Federal Reserve Board Law Enforcement Unit (LEU) guard booths in the south garden terraces at the Eccles and FRB-East Buildings. New guard booths are also proposed at the east and west side of the FRB-East Building adjacent to the parking garage ramps. The Board is still working on the proposed design of the guard booths which they note will be sensitive to the landscape and historic buildings.

Overall, staff finds that the proposed perimeter security system is much improved with its simpler more minimal design. The cable rail allows for fewer bollards with less impact on the tree zone. Therefore, staff recommends that the Commission:

**Finds** the Board proposes to replace the existing perimeter security system around the Eccles Building with a simpler/more elegant post and rail design in the same location as the existing bollard system.

**Notes** the Board’s proposes to replicate the same perimeter security design around the FRB-East building.

**Finds** that overall, the proposed design is an improvement from the existing oversized and tightly spaced bollards but that additional consultation is needed with the consulting parties.

**Requests** additional information and renderings for all of the guard booths.

**Finds** the perimeter security will not allow the public any access to the grounds and that the Board should consider public access to some of the grounds (such as the fountains or northwest plaza) and/or virtual tours of the buildings as potential mitigation in the Section 106 process.

**National Park Service Triangle to the North of FRB-East**

The small triangle of land immediately to the north of the FRB-East site is owned by the National Park Service (NPS). This triangle site could one day accommodate a small memorial. Construction related to the building addition will directly impact the property and the Board is proposing several improvements to mitigate the impacts to both the NPS property and to the adjacent R.O.W.

Impacts include the excavation related to the building addition, installation of perimeter security system and utility improvements, including a heat recovery system. These improvements will disturb the existing tree root systems and walkway along the edge of the property, so the Board proposes to remove and plant a new row of trees and install a continuous planting buffer at the ground plane on the NPS property to minimize visual impacts as well as create a buffer between the two properties.
The row of trees would align with the C Street street trees reinforcing the historic roadway alignment and framing views to the future memorial site. These trees could potentially be removed at a later date should the NPS decide to make property improvements. The Board will also install a new east-west walkway to replace the existing walk that is currently in poor condition. NPS has noted that there are several issues that still need to be resolved including whether new trees could survive on top of a heat recovery system.

Therefore, staff recommends the Commission:

**Notes** that construction related to the building addition of FRB-East will directly impact the National Park Service triangular shaped property to the north.

**Notes** the Board is proposing to make landscape, path, and sidewalk improvements as part of the overall project.

**Requests** the Board continue to coordinate all improvements with the National Park Service.

**Lighting**

The Board proposes to update exterior lighting across the site. Landscape accent lighting would highlight garden features and complement plantings. Street lighting will meet DDOT and Monumental Core Street standards. To more effectively illuminate the site for aesthetic and security-related reasons, the current exterior lighting along the Constitution Avenue frontage will be supplemented with building façade lighting. Façade lights will use precision LED optics to limit coverage to building surfaces, will be lamped with more circadian-and star-gazing-appropriate warm white and very warm white LEDs and will be tuned based on time-of-night (using very warm white LEDs during later hours). Where supplemental security lighting is necessary, precision warm-white-LED optics will be used. The current areaway floodlights in FRB-East Building will be replaced with more subtle lighting achieved with two proposed “layers” of warm-white and very-warm-white LEDs reminiscent of incandescent lighting of the original period.

The addition to FRB-East Building will not have exterior lights for the building facade. Interior workplace lighting will be intermittently visible depending on the room function and on one’s viewing vantage point. From the pedestrian and vehicular perspective, the DC city street trees will obscure direct vision and only long oblique views will reveal lighted office space. The Board notes that light levels will not be bright enough to spill out, nor will the addition have a “glowing effect.” By code and for energy conservation, the lighting control system will automatically turn off lights when spaces are unoccupied.

**Notes** the Board has submitted an initial response to the Commission’s lighting request, noting that exterior lighting will be updated across the site, including lighting for the building façades, vehicular and pedestrian access, and the streetscape.

**Requests** the Board submit an exterior lighting plan/diagram for the grounds and building facades at final review.
Wayfinding

The Board notes that their goal is to develop a wayfinding strategy that emphasizes the Federal Reserve’s civic importance. Their goal is for these elements to complement the campus exterior by remaining sensitive to the design, materiality and finishes of each building’s façade. The exterior signage will use contemporary materials and processes to respect the historic features of each building.

Anticipated sign types consist of a building name and Federal Reserve Board seal at the main entries of both Eccles Building and FRB-East Building, supplemental pedestrian directional signage at the previous Eccles Building entry, supplemental vehicular directional signage at the 19th street parking entry of the 1951 building, and inlaid typographic paver bands at the stairs leading to the main entries of both Eccles Building and FRB-East Building. Staff finds that this wayfinding strategy will create a more unified appearance and signage system throughout the campus.

Therefore, staff recommends that the Commission:

**Notes** the exterior signage will use contemporary materials and processes that respect the historic features of each building while creating a more unified appearance and signage system throughout the campus.

**Supports** the Board’s approach to signage and wayfinding and requests a more detailed wayfinding plan at final review.

General Comments

The Section 106 and NEPA processes are ongoing and as a result there may be additional modifications to the design between preliminary and final review. Therefore, staff recommends 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.

**Requests** additional coordination with all consulting parties regarding the proposed design, landscape plan, lighting, and perimeter security.

**Notes** that the Federal Reserve Board has prepared a Draft Environmental Assessment which is available for public comment until October 12.
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). To meet their compliance with Section 106, the Board has initiated the Section 106 process, and has held four 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.

FRB has drafted an Assessment of Effects report, and has determined that the implementation of the project will result in an adverse effect to the Eccles Building and the FRB- East Building properties as character-defining features of the buildings and landscapes will be altered or removed, which will diminish their integrity. In addition, the project will have an adverse effect on the Northwest Rectangle Historic District as it will change the character of the district and the contributing physical features of the district’s setting and introduce visual elements that diminish the integrity of the district’s historic features. The Section 106 process is on-going with Consulting Parties continuing to work together to identify ways to avoid additional adverse effects, as well as minimizing any effects, while discussing opportunities for appropriate mitigation to address the adverse effects resulting from the project. Section 106 will be completed by both agencies prior to the submission of the Final Building and Site Plan review by the Commission.

National Environmental Policy Act

Both the Federal Reserve Board and NCPC have an individual responsibility to comply with the National Environmental Policy Act (NEPA). To meet their compliance for the NEPA, the Board has prepared an Environmental Assessment (EA), with NCPC as a cooperating agency. The EA is available for public review and comment for a period of 30 days from September 11, 2020, through October 12, 2020. The EA includes a discussion of pertinent topics including cultural resources and transportation, as well as natural resources and sustainability, vegetation and tree canopy, stormwater runoff and management, impervious surfaces, energy use, and impacts from construction, including noise and air quality. The EA also includes a Transportation Management Plan (TMP). NEPA will be completed by both agencies prior to the submission of the Final Building and Site Plan review by the Commission.
CONSULTATION

Coordinating Committee

The Committee forwarded the proposed preliminary site and building plans to the Commission with the statement that the proposal has been coordinated with all participating agencies. The SHPO is coordinating on this subject to completion of Section 106. This project is coordinated with DOEE for stormwater management. The proposal has been reviewed by the Public Space Committee and will need to return to show how earlier comments were addressed. DDOT and OP noted that they want changes in the curb cuts on 20th Street and reductions in ramp space and are continuing to review the proposed plans. Urban Forestry has commented on impacts to public trees and is continuing to review the trees located over the parking garage, and notes that a tree permit should be submitted. NPS noted that they are continuing to meet with the applicant regarding proposed changes in and around Reservation 108 and other NPS properties, including utility locations, tree inventory and any proposed removal/replacements, and construction staging.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts (CFA) reviewed a concept for the Federal Reserve Board Building Project in January 2020 and revised concepts in May and July 2020.

ONLINE REFERENCE

The following supporting documents for this project are available online at www.ncpc.gov:

- Submission Package

POWERPOINT (ATTACHED)
CFA Letter 07/16/20

Prepared by Lee Webb
09/20/2020
Dear Ms. Varnon:

In its public meeting of 16 July conducted by videoconference, the Commission of Fine Arts reviewed a revised concept design for an addition to the Federal Reserve Board–East Building at 1951 Constitution Avenue, NW, part of a larger project to renovate and expand the Federal Reserve Board’s headquarters campus. Citing the overall improvement of the design, the Commission approved the proposal with the following comments.

The Commission members supported the proposed revisions as responsive to their prior guidance to articulate the glazing system of the addition by extending the lines of the existing facade into the new elevations; they found that the refinements using a variety of translucent glass panels would be effective in reinterpreting the historic architectural patterns in a contemporary way. In particular, they noted the success of the design in relating the rhythm of the monumental windows in the historic building to the new, slightly projecting glass bays proposed in the addition; they also found that the more solid treatment at the hyphen and entrance on 20th Street, using stone instead of glass between the two architectural systems, was an improvement. However, they continued to raise concern about the potentially excessive transparency of the addition’s exterior, which they said may be exaggerated in the renderings; they recommended deliberate control of the interior space—by carefully designing the ceilings, prohibiting demising partitions near the perimeter, and managing the use of window shades—to prevent a chaotic, undignified expression on the exterior. As the design is developed, they suggested using a more opaque material at the implied pilasters between the bays, such as glass panels with a stone interlayer or marble panels, to modulate the extreme transparency conveyed in the renderings.

The Commission looks forward to further review of the design for the East Building project, as well as for the Eccles Building and the associated site work for both properties. Please coordinate continued review of the project with the staff which, as always, 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 Associates
Marriner S. Eccles and Federal Reserve Board-East Building Renovation and Expansion

1951 Constitution Avenue, NW, Washington DC

Approval of Preliminary Site Development Plans

Board of Governors of the Federal Reserve System
Site Location
Project Location on Constitution Avenue, NW
Area Description
Eccles Building Existing Conditions
FRB - East Building Existing Conditions
Concept Options Comparison
Preferred Option B
Project View from Southwest
Existing Conditions

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 Conditions

7. 20th St South View
8. C St East View
9. FRB-East Building West Facade
10. Eccles Building West Courtyard Entry
11. 20th St North View
12. Constitution Ave East View
Existing Conditions

13. FRB-East Building South Facade
14. Constitution Ave View West
15. FRB-East Building East Facade
16. Virginia Ave and 19th St View
17. FRB-East Building North Facade
18. Constitution Ave View West
Project Renderings
Project Renderings

**Perspective Eccles Building Entrance on 20th Street**

**Perspective from 21st Street and C Street Looking East**
Existing Courtyard
Project Renderings
Proposed Courtyard Sections
Project Renderings
Project Renderings
Viewshed Analysis

Figure 4-6: Key plan

Figure 4-7: Existing view looking northeast along Constitution Avenue from 23rd Street toward project area

Figure 4-8: Simulation looking northeast along Constitution Avenue from 23rd Street toward project area
Viewshed Analysis

Figure 4-9: Key plan

Figure 4-10: Existing view looking northeast toward project area from the Vietnam Veterans Memorial.

Figure 4-11: Simulation looking northeast toward project area from the Vietnam Veterans Memorial.
Viewshed Analysis

Figure 4-12: Key plan

Figure 4-13: Existing view looking northeast toward project area from Constitution Gardens.

Figure 4-14: Simulation looking northeast toward project area from Constitution Gardens.
Viewshed Analysis

Figure 4-15: Key plan

Figure 4-16: Existing view looking northeast toward project area from 21st Street and Constitution Ave NW.

Figure 4-17: Simulation looking northeast toward project area from 21st Street and Constitution Ave NW.
Viewshed Analysis

Figure 4-18: Key plan

Figure 4-19: Existing view looking northeast from the top of the Lincoln Memorial toward the project area.

Figure 4-20: Simulation looking northeast from the top of the Lincoln Memorial toward the project area.
Viewshed Analysis

Figure 4-21: Key plan

Figure 4-22: Existing view looking northwest along Constitution Avenue from 17th Street toward project area

Figure 4-23: Simulation looking northwest along Constitution Avenue from 17th Street toward project area
Viewshed Analysis

Figure 4-24: Key plan

Figure 4-25: Existing view looking northwest toward project area from 20th Street and Constitution Ave.

Figure 4-26: Simulation looking northwest toward project area from 20th Street and Constitution Ave.
Viewshed Analysis

Figure 4-27: Key plan

Figure 4-28: Existing view looking southwest toward project area from 19th Street and Virginia Ave NW

Figure 4-29: Simulation looking southwest toward project area from 19th Street and Virginia Ave NW
Viewshed Analysis

Figure 4-30: Key plan

Figure 4-31: Existing view looking west from the top of the Washington Monument toward the project area.

Figure 4-32: Simulation looking west from the top of the Washington Monument toward the project area.
Massing Comparison
Concourse Level 1
Parking Level 1
Parking Level 3
Building Section – Eccles (East-West)
Building Section (East-West) – FRB East
Building Section (North-South) - Eccles
Building Section (North-South) – FRB East
Existing Site Analysis – Sidewalks and Grading
Existing Accessibility and Security
Existing Tree Analysis
Demolition/Excavation Areas and Trees
Proposed Landscape Plan
Proposed Site Security Diagram
Proposed Security Measures
Proposed Typical Street Tree Planting

Proposed Typical Street Tree Planting Detail

Street Tree Planter Soil Volumes

Typical Tree 7’ wide planter (Max)
Average soil volume = 1500 cu ft (850 cu ft uncovered, 750 cu ft covered)
7’ wide planter (4.5’ deep) + 7’ extended planting soil area (4’ deep)

DOT Soil Volumes
- Large trees: 1500 cubic feet of soil within a R27
- Medium trees: 1000 cubic feet of soil within a R22
- Small trees: 600 cubic feet of soil within a R16

*Soil volume is calculated as: (Area of Open Soil x Depth of Soil) + (Area of Covered Soil x Depth of Soil)
Eccles Building Landscape
FRB East Landscape
FRB East – Entrance and Plaza
FRB East – Triangle Park Area
NPS Triangle Park Improvements

Figure 3-34: Existing Conditions at Virginia Ave NW and 19th St NW
Parking Ramp Proposal – Street Level
Parking Ramp Proposal – Below Grade
Project Site Plan with Circulation/Access Elements