

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**CULTURAL HERITAGE PARTNERS,
PLLC, et al.,**

Civil Action No. 1:25-cv-03969-DLF

Plaintiffs,

v.

**DECLARATION OF REBECCA
MILLER**

DONALD J. TRUMP, et al.,

Defendants.

**DECLARATION OF REBECCA MILLER IN SUPPORT OF PLAINTIFFS' RESPONSE
IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS**

I, REBECCA MILLER, under 28 U.S.C. § 1746, hereby declare on my own behalf and on behalf of DC Preservation League:

1. My name is Rebecca Miller. I have personal knowledge of the matters stated herein. I submit this declaration in support of Plaintiffs' Response in Opposition to Defendants' Motion to Dismiss to provide additional detail relevant to Article III standing in light of the standards articulated by the Supreme Court and the U.S. Court of Appeals for the D.C. Circuit.

2. I am the Executive Director and a dues-paying member of the DC Preservation League ("DCPL"). I have served as Executive Director for almost 21 years (since 2005), and I have been a member of DCPL for almost 23 years. I submit this declaration both in my professional capacity as Executive Director of DCPL and in my personal capacity as a dues paying member. Where I describe my own use of and interest in the Eisenhower Executive Office Building ("EEOB") and the Lafayette Square National Historic Landmark District ("NHLD"), I speak in my individual capacity as a member of DCPL who has standing to bring these claims in my own right.

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3. DCPL's mission is "to preserve, protect, and enhance the historic and built environment of Washington, DC, through advocacy and education." DCPL's principal office is located at 1328 Florida Avenue, NW, 2nd Floor, Washington, D.C. 20009. Our office is located approximately 1.9 miles from the EEOB and the Lafayette Square NHLD.

4. DCPL's purpose is to protect and enhance the physical and social environment of Washington, D.C., and to educate and inform the public about matters concerning the physical and social environment of Washington, D.C. This includes, but is not limited to, promoting increased governmental and community support for the protection and enhancement of historically, socially, and artistically significant buildings and neighborhoods in Washington, D.C.

5. DCPL's more than 1,000 members include residents, commuters, local businesses, and organizations in Washington D.C., all of whom care about the preservation of the city's historic and built environment, including the EEOB. A significant portion of our membership lives, works, or regularly spends time in and around the Lafayette Square NHLD and President's Park, and many of our members routinely view and enjoy the EEOB. Many members of DCPL—including myself—experience aesthetic, recreational, professional, and educational enjoyment of the EEOB.

6. DCPL members have told me that they intentionally visit Lafayette Square NHLD on weekends with their friends and families to view the White House and the EEOB together, appreciate the historic setting, and take in the architecture. They have described specific vantage points—such as the north side of Lafayette Square, looking south toward the White House and west toward the EEOB—as central to the historic experience they seek and intend to continue seeking on future visits.

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7. In my role as Executive Director, I am familiar with DCPL's mission and activities, including the organization's advocacy, tours, lectures, and educational programs in central Washington, D.C., as well as the ways in which DCPL staff and members use and value Lafayette Square NHLD, President's Park, and the area surrounding the EEOB. The events DCPL hosts often highlight the relationship between the White House, the EEOB, and the larger President's Park landscape. The EEOB's unpainted granite exterior and slate exterior is a key part of what we show to program participants and is central to the story we tell about how Washington's historic built environment has been preserved.

A. My personal use of Lafayette Square NHLD, President's Park, and the EEOB

8. I live in the Bloomingdale Neighborhood, in Washington, D.C., less than 2.5 miles from the EEOB. I work equally from home and from DCPL's office. I regularly visit the EEOB, Lafayette Square NHLD, and President's Park for both professional and personal reasons.

9. Over the past year, I visited the EEOB area approximately every six to eight weeks, often during the work week and on weekends for recreational purposes and social activities. I frequently stop in Lafayette Square to look toward the White House and the EEOB and to appreciate the contrast between the two buildings and the way the EEOB anchors the western side of the park.

10. Until Lafayette Park went under construction, my son and I would walk between the Farragut North Metro Station through Lafayette Park and down 17th Street to the National Mall, passing the EEOB on a fairly regular basis. This route provides direct and repeated views of the EEOB's unpainted gray granite façade, slate roofs, and Second Empire details.

11. My work also brings me to this area regularly. Regardless of whether I am visiting this area for professional or personal reasons, I notice and value the same thing: the EEOB's unpainted granite and slate exterior and its relationship to the surrounding landscape.

12. Since November 2025, the threat of Defendants' plan to paint the EEOB (the "EEOB Project") has changed my personal experience of visiting the EEOB and Lafayette Square. The threat to EEOB has changed my non-work visits. The EEOB is the grande dame of Washington, D.C.'s Second Empire building stock, and one of my favorite architectural styles. I often find myself routing my travels past the building to enjoy its architecture and tell friends and family members from in town and visiting about its history.

13. I have concrete plans to continue visiting this area for personal reasons. My son has recently become interested in the American Revolution and is learning about the Marquis de Lafayette and the French assistance in America's victory over tyranny. He recalls our walks through Lafayette Park and would like to visit it to see the statue.

B. Organizational Injury and Diversion of DCPL's Resources

14. Through my work as the Executive Director of DCPL, I visit the EEOB area on a regular basis. I often meet colleagues in Lafayette Square NHLD or walk with them around the EEOB and President's Park. I point out the EEOB's historic architecture, explain its role in the larger historic landscape, and describe why its current appearance—dark granite and slate—matters to the character of the District.

15. Since November 2025, I have visited the area around the EEOB area to observe activity related to the construction at the White House and to view EEOB. I have also conducted three walking tours—on January 20, 2026; February 24, 2026; and March 25, 2026—that included the EEOB for DCPL members concerned about the EEOB Project and the demolition at the White

House. I have also made two presentations to the public to discuss the architecture and historic significance of the EEOB, among other DC Landmarks.

16. I have concrete plans to continue visiting this area. As of this declaration, I anticipate being in or around Lafayette Square and the EEOB at least six times in the next six months, including additional member tours DCPL has scheduled for May 4, 2026, and June 1, 2026. On those occasions, as on my past visits, I expect to view and experience the EEOB from multiple vantage points in and around Lafayette Square and President's Park.

17. Since President Trump publicly announced the EEOB Project and stated that he was "getting bids right now from painters," DCPL has already begun diverting significant staff time and resources in response. When the General Services Administration ("GSA") executed a Memorandum of Understanding ("MOU") with the Office of Administration ("OA") on January 29, 2026, DCPL had to divert additional organizational resources. Between November 2025, and the present, DCPL staff (including myself) have spent approximately 85 hours monitoring developments, reviewing press reports and publicly available documents, coordinating with partner organizations, and planning our response to the EEOB Project.

18. This diversion is not merely a reallocation of DCPL's general advocacy work. The EEOB Project has directly impaired DCPL's ability to deliver its core programmatic activities: the tours lectures and educational programs that specifically feature the EEOB's unpainted granite and slate exterior as the subject of the organization's preservation message.

19. That time and effort have come at the expense of other DCPL priorities. DCPL has diverted organizational resources that would normally be focused on advocating for the preservation and protection of buildings that are regulated under the D.C. Historic Landmark and Historic District Protection Act to instead monitor, research, document, and engage in public

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outreach/education over the proposed ill-advised changes to EEOB under the National Historic Preservation Act (“NHPA”).

20. As part of Women’s History Month (March), DCPL had planned to host a walking tour focused on the Women’s Suffrage Movement, highlighting EEOB as a focal point of lobbying efforts of activists who targeted officials within the building to lobby for voting rights. Because of construction around President’s Park, the tour is not currently feasible. Further, DCPL was also not able to focus legal efforts toward the demolitions at the St. Elizabeths West Campus due to the diversion of resources to the EEOB Project.

21. If the EEOB Project proceeds without lawful review, DCPL will be forced to devote additional time and resources to:

- a. Monitoring after-the-fact actions;
- b. Educating the public about the permanent alterations to the EEOB’s historic exterior;
and
- c. Advocating for mitigation or remedial measures that are likely to be more difficult and less effective after irreversible damage has occurred.

22. This diversion of staff time and organizational resources frustrates DCPL’s mission and impairs our ability to carry out planned advocacy and educational programs elsewhere in the District. Because our staff and budget are limited, time spent responding to an unlawfully executed EEOB Project necessarily reduces the time and resources we can devote to other preservation work throughout Washington, D.C.

C. Procedural injury and planned participation in environmental and historic-preservation review processes

23. DCPL has a long history of participating in NHPA Section 106 consultations and National Environmental Policy Act (“NEPA”) reviews for federal projects in Washington, D.C. In

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past cases, we have submitted written comments, attended meetings, and helped identify alternatives and mitigation measures to avoid or minimize harm to historic properties.

24. Neither DCPL nor its members have received any notice of NEPA or NHPA review for the EEOB Project. To our knowledge, no environmental assessment or environmental impact statement have been published for public review or comment, and no Section 106 consultation or Section 110(f) process has been initiated. No public meetings or comment opportunities have been announced, and DCPL has not been invited to consult, despite the EEOB's status as a National Historic Landmark and contributing building within the Lafayette Square NHL.

25. If Defendants initiated NEPA and NHPA review for the EEOB Project, DCPL would participate by reviewing environmental and historic-preservation documents; submitting written comments; and engaging in any available Section 106 and Section 110(f) consultations, including meetings or site visits. We would advocate for alternatives and mitigation measures that would avoid or minimize harm to the EEOB and the Lafayette Square NHL.

26. By moving forward without NEPA and NHPA review in a lawful manner, Defendants deprive DCPL and its members of information and of a meaningful opportunity to influence the decisionmaking process before irreversible work begins. That denial of procedural rights is itself a harm to DCPL's members—who live, work, and recreate near the EEOB and seek to participate in federal decision-making—and to DCPL as an organization that exists to ensure that historic-preservation laws are followed.

27. In addition to DCPL's organizational interest in these review processes, I have a personal stake in the procedural rights described above. The Section 106 and NEPA review processes would provide me with an opportunity to present my individual concerns about how the proposed painting would affect my personal use and aesthetic enjoyment of the EEOB and

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Lafayette Square, as described in Section A of this declaration. My concrete interest in preserving the unpainted granite exterior is not limited to my role at DCPL; it is rooted in the personal connection to this building and this area that I have maintained for years as a resident, a regular visitor, and a parent who walks past this building with my son. The failure to lawfully initiate these processes has deprived me of that opportunity.

28. The injuries I have described, both personal and organizational, are fairly traceable to GSA's execution of the MOU with OA on January 29, 2026, and to Defendants' failure to initiate and complete the review processes required by NEPA and the NHPA before advancing the EEOB Project. GSA owns and manages the EEOB and is responsible for ensuring compliance with these statutes when approving or overseeing alterations to the building. The National Park Service manages President's Park and properties within the Lafayette Square NHLD and has responsibilities under the NHPA, including Sections 106 and 110(f), for undertakings affecting those resources.

D. Harm and redressability

29. Painting the EEOB would cause irreparable harm to DCPL and its members. The unpainted granite and slate façade of the EEOB are key elements of the Lafayette Square NHLD's character and contribute to the visual and historical experience that I and many DCPL members cherish. Painting the building would permanently alter its appearance, undermine its integrity, and diminish the historic setting of Lafayette Square and President's Park. Once the original granite and slate surfaces are abraded and coated, they cannot be restored without further damage.

E. Related Litigation

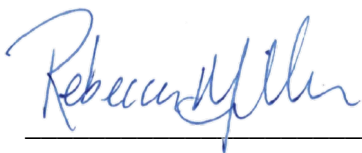
30. Because DCPL has a deep interest in the preservation of the EEOB's historic exterior, and because President Trump has acted quickly and without notice to implement other

actions that have irreparably altered or destroyed other historic settings, on November 20, 2025, DCPL submitted a Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, request to GSA seeking records related to planning for alterations to the EEOB exterior.

31. To date, GSA has failed to determine whether to grant DCPL’s request for expedited processing and failed to promptly disclose responsive records.

32. DCPL has filed a separate action seeking relief for those FOIA violations. Compl., *D.C. Pres. League v. Gen. Servs. Admin.* (“*DCPL v. GSA*”), No. 1:26-cv-00032-JDB (D.D.C. Jan. 7, 2026), Dkt. No 1. GSA filed its Answer on March 2, 2026. Answer, *DCPL v. GSA*, No. 1:26-cv-00032-JDB (D.D.C. Mar. 2, 2026), Dkt. No 10.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 27, 2026, in Washington, D.C.



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