

EXHIBIT 2

**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
ROBERT ALLAN PECK**

DONALD J. TRUMP, et al.,

Defendants.

**DECLARATION OF ROBERT ALLAN PECK IN SUPPORT OF PLAINTIFFS’
RESPONSE IN OPPOSITION TO DEFENDANTS’ MOTION TO DISMISS**

I, Robert Allan Peck, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct and based on my personal knowledge:

1. My name is Robert Allan Peck. I am over the age of eighteen and competent to make this declaration. I reside in Washington, D.C., approximately five (5) miles from the Eisenhower Executive Office Building (“EEOB”).

2. I am a current member of the DC Preservation League (“DCPL”). I have been a member on and off since approximately 1978. For six years, in the 1980s, I was the president of DCPL and its predecessor organization, Don’t Tear It Down.

3. I regularly visit the EEOB area, Lafayette Square National Historic Landmark District (“Lafayette Square NHL”), and President’s Park for personal reasons. Over the past year, I have visited this area approximately once a month on my way to nearby appointments and events. I drive by the EEOB several times a month. The EEOB is a central part of my experience of

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Lafayette Square NHLD and the White House area as a historic district. It is one of the buildings in Washington, D.C., that I go out of my way to point out to friends who are visiting from other cities and countries. My father worked at the Department of Veterans Affairs headquarters that abuts Lafayette Square on Vermont Avenue, and when I visited him at his office, he would take me to the Square and point out the White House, the Treasury Building, and the EEOB as important landmarks in our city.

4. The EEOB's unpainted gray granite façade, slate roof, and French Second Empire architectural details are meaningful to me. I grew up in Washington, D.C., and then Montgomery County, Maryland. I studied architectural history in college and again when I was in law school, and the changing architectural styles throughout history has been a longstanding interest of mine. I was a contributor to the book *The Federal Presence: Architecture, Politics, and Symbols in United States Government Building* (1978). That book prominently covered the EEOB and its architect, pointing out its importance as an example of the eclectic architectural styles that characterized Federal architecture throughout the country following the Civil War. The book also noted the proposals, circa 1920, to demolish the EEOB's gray stone Empire-style façades and replace them with white classical façades. This experience makes me aware that the EEOB's gray (natural) stone façades and stone ornamentation are intrinsic to its architectural style.

5. My professional work has also made me intimately familiar with the EEOB. Beginning in 1973, and over the course of my career, I visited the EEOB for numerous meetings. My first job in D.C. (1973–1974) was at the U.S. Office of Management and Budget. While my office was in the New Executive Office Building, I attended meetings in the EEOB at least once a week during that time. From 1978 through 1979, I was detailed to the White House from the

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National Endowment for the Arts. During that detail, my office was in the EEOB. From 1995 to 2001, and again from 2009 to 2012, I was the Commissioner of Public Buildings at the U.S. General Services Administration. My duties included the design, construction, operations, and maintenance of most civilian federal buildings in the United States. The EEOB was a matter of concern in both of my terms as Commissioner. I visited it often for meetings and was involved in projects that used large expenditures of federal dollars to improve its functioning and security while conforming to and enhancing its historic appearance. So, I have personal and professional reasons to notice and value the EEOB's unpainted granite exterior and its relationship to the surrounding landscape.

6. Since November 2025, when President Trump publicly announced his interest in painting the EEOB, the threat of painting has changed my experience of visiting the EEOB and Lafayette Square NHLD. I try to imagine the exterior painted white and think about how the building's unique style and its natural granite presence would no longer speak to its period in the history of the Federal presence in Washington. I have often regaled friends and visitors with the story of the near miss that we had with changing the EEOB's exterior to classical architecture: that is a style in abundance in Washington, while the eclectic government architectural style represented by the EEOB and the Old Post Office, are nearly gone. To my knowledge, this administration has not stated that it will not paint the EEOB, and the threat of painting remains present each time I visit.

7. I have concrete plans to continue visiting the EEOB and Lafayette Square area. I expect to be in or around this area on foot at least six (6) times in the next six (6) months, including regular lunches at nearby restaurants, and not including the numerous times I drive by the EEOB

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on 17th Street, NW, on my way to meetings or events. 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.

8. My future visits to this area are significant because the threat to the EEOB remains unresolved. The building's granite facade and historic character are at risk of irreversible alteration, and no lawful review under the National Historic Preservation Act ("NHPA") or the National Environmental Policy Act ("NEPA") has been completed. Each time I visit, I do so with the knowledge that the building I value may be permanently changed without the review and public participation that federal law requires.

9. The proposed painting of the EEOB would personally and concretely harm me. I am a lifelong Washingtonian and a longstanding historic preservation supporter, as well as something of an expert specifically on Federal government architectural history. As noted previously, if the building were to be painted white or any other color, it would no longer represent its period in Federal architectural history. It would wipe out a vestige of the city's history and the Federal government's building history. I am particularly attuned to both and so this demolition-by-faux cladding would be unnerving to me.

10. I am further harmed by the failure to initiate and complete Section 106 consultation under the NHPA and review under NEPA before proceeding with the EEOB Project. Had these reviews been properly initiated, DCPL would have had the opportunity to seek consulting party status and to submit comments and expert input on the effects of painting the EEOB. I would have participated in that process through DCPL as a member whose personal use of this area depends on the preservation of the EEOB's unpainted granite exterior. To my knowledge, no public

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comment period or consultation opportunity has been provided in connection with the EEOB Project, despite the EEOB's designation as a National Historic Landmark. The absence of these review processes has deprived me and other DCPL members of any opportunity to have our interests considered before an irreversible decision is made. Without Section 106 consultation, there is no mechanism for my concrete concerns about the EEOB to be heard.

11. I have previously participated in historic preservation review processes in Washington and elsewhere. As Commissioner of Public Buildings, I was an alternate representative for the General Services Administration statutory membership on the President's Advisory Council on Historic Preservation and the National Capital Planning Commission ("NCPC"). I served on the U.S. Commission of Fine Arts ("CFA") for one four-year term. In my duties as Commissioner of Public Buildings, I reviewed, approved and had high-level supervision of numerous projects involving historic Federal buildings that were subject to Section 106, NCPC, CFA, and NEPA reviews. I have been a zoning attorney in private practice in Washington and have participated in Section 106 and CFA reviews concerning historic buildings from that perspective, too. Based on that experience, I understand the value of these processes in ensuring that the public's interests in historic resources are considered before federal agencies take action that may cause irreversible harm.

12. The injuries I have described are fairly traceable to the GSA's execution of the Memorandum of Understanding with the Office of Administration 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.

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

R.A. Peck

Robert A. Peck

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