

May 5, 2026

To the Chairman and Commissioners of the U.S. National Capital Planning Commission:

I served as the Public Buildings Commissioner at the U.S. General Services Administration (GSA) from 2012-2014. GSA Administrator Dan Tangherlini and I negotiated the lease of the Old Post Office to The Trump Organization. From 2009-2012, I was the Deputy Under Secretary of Defense for Installations & Environment in the Department of Defense, with Department-wide oversight of U.S. military bases. Also relevant, from 1993-2001, as a member of President Clinton's White House economic team, I worked in the Eisenhower Executive Office Building (EEOB). During President Clinton's second term, I occupied Room 226 of the EEOB, which was part of the Secretary of War's suite. I pinched myself every day I worked in the EEOB. When I left GSA, my staff gave me a replica of the brass doorknob for Room 226, with its swords and shield signifying the War Department.

I write in strong opposition to President's Trump's proposal to paint the EEOB.

***First, the gray granite façade is intrinsic to the design of the EEOB – a monumental building that is revered – and protected as a National Historic Landmark -- for its exceptional architecture and prominent role in American history.***

Alfred B. Mullett, the architect of the State, War and Navy Building, as the EEOB was initially known, selected granite for the building's exterior for aesthetic as well as functional reasons. As described in the Commission of Fine Arts' (CFA) superb 2018 book on the EEOB, *Palace of State*, granite was "a hard, gray stone that could be milled to hold sharp corners and which could convey a feeling of muscularity and mass..."<sup>1</sup> Mullett sourced the granite from two quarries, in Virginia and Maine, whose stone differed in hue. By using the darker gray Virginia granite for the flat surfaces and the creamier Maine granite for the rusticated base and columns, Mullett highlighted the architectural features of the massive building.<sup>2</sup>

Mullett's exuberant French Second Empire design, which reflected the optimism of the post-Civil War mood in the United States, fell out of favor with architects over time, and the building's interior systems became outdated. There were repeated efforts to demolish the EEOB, including by an Advisory Commission on Presidential Office Space established by President Eisenhower. Fortunately, the cost of demolition impeded such action and, beginning in the

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<sup>1</sup> *Palace of State: The Eisenhower Executive Office Building*, Thomas E. Luebke, Editor, U.S. Commission of Fine Arts, Distributed by University of Massachusetts Press, 2018, p. 75. Several chapters of *Palace of State* draw heavily on a history of the EEOB published by the Reagan Administration: Andrew Dolkart and Mina Wright, *The Old Executive Office Building: A Victorian Masterpiece*, Executive Office of the President, Office of Administration, 1984.

<sup>2</sup> *Palace of State*, p. 75; and David Scott Parker, Webinar Convened by the National Historic Preservation Trust, April 30, 2026. The EEOB's violet-gray slate Mansard roofs and black ornamental ironwork add to the subtle, polychromatic appearance that Mullett achieved.

1960s, architects and historians embraced the building as a Victorian masterpiece and welcomed its contrast to the white marble temples and glass boxes that populated the city.<sup>3</sup>

The EEOB has witnessed more history than all but three other buildings in Washington, DC: the White House, U.S. Capitol and Supreme Court. Two international wars were announced and more than 1,000 treaties signed in the EEOB. Five U.S. presidents served first in positions based in the EEOB (Secretary of War William Howard Taft was at work in Room 226 in 1908 when he learned he was the Republican presidential nominee). Dwight Eisenhower held presidential press conferences in the so-called Indian Treaty Room, and Richard Nixon recorded many of the Watergate tapes in Room 180, which served as his informal office. As home to the National Security Council (NSC), the National Economic Council and the Council of Economic Advisers, among others, the EEOB continues to stage executive branch policymaking at the highest levels.

***Second, the use of paint on historic granite is unwarranted and harmful. Painting the EEOB would do irreparable damage to the granite while dramatically raising maintenance costs.***

The President's proposal violates a fundamental rule of building maintenance and preservation: DO NOT PAINT GRANITE. Granite is a superior building façade that has been used for other iconic structures in Washington, DC, such as the Library of Congress and the Old Post Office. Left unpainted, granite requires little maintenance. Once granite is painted, however (and examples are rare), it requires extensive maintenance in perpetuity.

The painting process itself damages the granite, because of the surface abrasion necessary to get the paint to adhere. Over time, paint traps moisture in the stone, leading to irreversible deterioration. Once applied, paint is extremely difficult to remove from granite and requires extreme measures such as sandblasting. The alternative is to regularly repaint the building, raising the cost of maintenance exponentially. One critic warned that the EEOB would become the Golden Gate Bridge of federal buildings: as soon as painting is finished on one end, it is time to begin again on the other.<sup>4</sup>

The President and his aides claim to have identified a “magic paint” – mineral silicate -- that avoids the problems of traditional paint. However, 25 technical experts who were surveyed by the DC Preservation League and Cultural Heritage Partners strongly refute that claim, arguing that mineral-silicate paint is no more suited than traditional paint for use on granite.<sup>5</sup>

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<sup>3</sup> *Palace of State*, p. 153.

<sup>4</sup> Remarks of Greg Werkheiser, Cultural Heritage Partners and Counsel to the DC Preservation League, to the U.S. Commission of Fine Arts, April 16, 2026. See video of the entire CFA meeting as recorded by *The Hill* and circulated by the DC Preservation League: <https://www.youtube.com/live/Cwtk6lg49QM?t=9895s>. CFA's consideration of the EEOB proposal begins at about 2:22, starting with a presentation of the President's proposal; the testimony of Mr. Werkheiser and others begins at about 2:45.

<sup>5</sup> *Ibid.* See also the CHP website for a summary of the survey of technical experts:

<https://www.culturalheritagepartners.com/wp-content/uploads/2026/03/20260305-Expert-Consensus-on-Using-Mineral-Silicate.pdf>.

***Third, the Public Buildings Service I led from 2012-2014 would have dismissed as laughable a proposal to paint the EEOB.***

The EEOB is the crown jewel in GSA’s building portfolio, which is managed by the Public Buildings Service (PBS). As a National Historic Landmark, the EEOB has been carefully maintained by PBS for decades. Following 9/11, Congress approved hundreds of millions of dollars to harden the EEOB against attack, and while “the hood was up,” PBS made repairs to the exterior and completed the painstaking restoration of the building interior that President Reagan had begun. The stunning results are shown in CFA’s *Palace of State*. President Trump’s proposal to paint the EEOB runs directly counter to the 30-year effort to restore and preserve this singular building.

More broadly, the President’s proposal undermines PBS’s role as a national leader in historic preservation. PBS has advanced this cause in part by utilizing Sec.111 of the National Historic Preservation Act (NHPA), which allows for the outlease of properties such as the Old Post Office to entities that agree to restore and maintain them. PBS is also a champion for the Secretary of Interior’s standards for how federal agencies should manage their historic properties under the NHPA.<sup>6</sup> The President’s proposal fails to meet these established standards, in the process reducing PBS’s credibility as a steward of historic federal buildings.

Finally, PBS is in no position to take on the higher cost of maintaining a paint-coated EEOB. The Federal Buildings Fund – the money that federal agencies pay to rent space in GSA buildings, and which PBS taps to maintain those buildings – is “broken,” because for 15 years, congressional appropriators have diverted \$1 billion a year, or about 8 percent of payments to the Fund, to cover *non-GSA* expenses such as the salaries of U.S. Treasury staff. This lamentable practice, which has left PBS with a \$26 billion repair-and-maintenance backlog, is a major reason many federal buildings are in such poor condition.<sup>7</sup>

Absent pressure from above, PBS would never help to advance an action (painting the EEOB) that fails to meet the Secretary of Interior’s standards for building preservation, risks causing irreparable harm to GSA’s crown-jewel building, and potentially imposes enormous maintenance costs in perpetuity. I can only imagine how painful it must be to be among the PBS career officials forced to assist with this ludicrous proposal.

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<sup>6</sup> See especially the Secretary of Interior’s standards on building rehabilitation:

<https://www.nps.gov/articles/000/treatment-standards-rehabilitation.htm>. Under the NHPA, federal agencies are to give “special consideration” to the historic and architectural qualities of National Historic Landmarks such as the EEOB.

<sup>7</sup> Statement of Andrew Heller, Acting Commissioner of the Public Buildings Service, before the House Committee on Transportation and Infrastructure, Subcommittee on Economic Development, Public Buildings Management and Emergency Management, December 11, 2025. See also

<https://www.businessofgovernment.org/sites/default/files/Profiles%20Dorothy%20Robyn.pdf>.

***Fourth, the recent CFA hearing on the President’s proposal to paint the EEOB proposal was not serious. NCPC needs to provide advice that is grounded in facts and analysis.***

CFA’s recent deliberation on the President’s proposal was not serious. The two presidential aides who presented the proposal provided no evidence of a genuine problem, much less any analysis of whether actions short of painting could address the seemingly minor issues noted in their slides. Rather, they said that painting a National Historic Landmark made sense because the contractors they had consulted “could not guarantee how much of the brown and staining can be removed [by cleaning] and how many passes, cleaner and water will be required.” The aides touted the ability of mineral-silicate paint to avoid the problems with traditional paint – a point strongly refuted by a subsequent witness for the DC Preservation League who summarized the views of 25 masonry specialists and other technical experts.<sup>8</sup>

With respect to the impact of traditional versus mineral-silicate paint, the CFA commissioners seemed to give the same weight to the presidential aides as to the witness who had surveyed 25 technical experts all of whom are willing to testify in court. In approving the President’s plan conceptually, the CFA gave a green light to the presidential aides to carry out additional testing, including on an interior courtyard of the EEOB. While this is a benign step, it may not resolve a technical dispute with experts whose views are based on years of experience and testing done under laboratory conditions. One could imagine a more impartial CFA seeking outside expertise from the National Academy of Sciences or other objective body.

The cavalier vote by the full CFA was consistent with the naïve views expressed by individual commissioners. The Vice Chair acknowledged that painting the EEOB white would increase maintenance costs but trivialized the issue by analogizing it to his preference for wearing dress white shirts despite the need for frequent laundering. (Has the Vice Chair walked by the J. Edgar Hoover Building, which under-maintenance by a budget-strapped GSA has rendered unusable?) The Vice Chair also observed that its shadowy gray color may have been appropriate when the EEOB housed the War Department but was unnecessary now that the building no longer serves that function (NSC staff might disagree). Another commissioner predicted that painting the EEOB white would improve morale among the building’s occupants by highlighting their connection to the White House. (Most EEOB occupants work nights and weekends to advance the President’s policy goals; they need more hours in the day, not a pep talk.)

***Fifth, the President’s proposal to paint the EEOB fails on aesthetic grounds.***

Ironically, the President did right by the Old Post Office, another Victorian “ugly baby” that was repeatedly slated for demolition before being embraced in the 1960s as an architectural gem. The Trump Organization invested more than \$200 million to restore the Old Post Office and convert it to a luxury hotel, working closely with historic preservationists in PBS and elsewhere.

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<sup>8</sup> Remarks of Greg Werkheiser, Op. Cit.

The President apparently doesn't like the color of the EEOB ("gray is for funerals"), and he says a white EEOB would be more visually congruent with the White House. However, painting a National Historic Landmark is the wrong way to achieve congruence. The EEOB dwarfs the White House in size; if the EEOB were painted white, it would appear even larger, visually overwhelming the White House. Moreover, the EEOB will continue to accrue stains, which are due to soot and contaminated rainwater; those stains will be even more visible against a white background.

*Conclusion*

The President's proposal to paint the EEOB is fatally flawed on technical, cultural, budgetary and aesthetic grounds. Any one of those flaws should be disqualifying. I urge the NCPC to undertake a serious examination of the proposal.

Sincerely,

Dorothy Robyn  
Washington, DC