February 23, 2021

The President
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Re: Request to Rescind Executive Order 13967 of Dec 18, 2020: “Making Beautiful Federal Civic Architecture”

Dear Mr. President,

The Society of Architectural Historians (SAH) expresses strong opposition to Executive Order 13967: “Making Beautiful Federal Civic Architecture,” issued by the previous administration on 18 December 2020, and requests that it be rescinded immediately.

On 10 February 2020, we expressed our objections to an earlier version of the Executive Order 13967 that circulated in draft form. In its final form, Executive Order 13967 addressed none of the concerns raised by a great many architectural and cultural institutions, and in fact extended many of its more objectionable tenets. As an organization whose members have observed, recorded, and analyzed both historic and contemporary architecture since our inception in 1940, we have come to understand that most significant public architecture in the United States has resulted from the intersection of monumentality, permanence, and aesthetic significance with the specific local demands of site and community. While we appreciate and encourage the attention paid to new federal courthouses and public buildings, we nonetheless remain convinced that the dictation of style - any style - is not the path to excellence in civic architecture.

While Executive Order 13967 begins well enough, by stating that federal buildings “...should uplift and beautify public spaces, inspire the human spirit, ennoble the United States, and command respect from the general public”, it declines precipitously thereafter. Section 2(c) is especially problematic, as it states “Where the architecture of applicable Federal public buildings diverges from the preferred architecture set forth in subsection (a) of this section, great care and consideration must be taken to choose a design that commands respect from the general public and clearly conveys to the general public the dignity, enterprise, vigor, and stability of America's system of self-government.” This section calls for the wholesale redesign of existing buildings, to render them classical or traditional. This flies in the face of accepted preservation methodologies, which seek to preserve the evolved life of a building.

Enforcement of this new policy is highly problematic as well, calling for the establishment of the “President's Council on Improving Federal Civic Architecture”, which body is charged with providing updates supporting this significant change in the treatment of federal architecture by the end of September, 2021. It is unclear if this body was actually established. We note that four of the seven Commission of Fine Arts members were appointed on January 12, 2021; like many federal agencies and committees, it was packed with individuals chosen by the previous administration in the very last days of that administration. Instead of truly representing the American public, the Council is now composed of a body of ideologically-aligned individuals, all
of whom are white males. The composition of this body fails to represent either the design profession or the broad social, political, and ethnic diversity of the American public. It also lacks a mechanism for citizen comment and participation, a necessary element to any legitimate and meaningful public undertaking.

There exists a framework for excellence in the design of federal buildings: *Democratic by Design: Guiding Principles for Federal Architecture* (1962). This statement concluded, “Major emphasis should be placed on the choice of designs that embody the finest contemporary American architectural thought...Design must flow from the architectural professional to the Government, not vice versa.” An important but often overlooked precept of *Democratic by Design* was the emphasis on “contemporary American architectural thought,” not necessarily contemporary design, as is often implied and interpreted. *Democratic by Design* encouraged both architectural practitioners and government officials to look for ways to express the ideals of American democracy in architectural form by looking to voices of the American public, rather than the amplification of a federal dictate from on high. Local voices should play a significant role in the design of federal buildings.

We advocate for a return to these principles, and to a federal architecture that is monumental, permanent, sustainable, and beautiful - not merely classical in inspiration. This could be achieved by listening to the voices of the American public, placing emphasis on the communities in which these new buildings are to be located, and stressing the General Services Administration’s role in insuring that these many voices are heard. Instead of prescribing a particular stylistic outcome, this path would instead call for not just architectural excellence, but also a thoughtful fit between new federal architecture and the communities in which these buildings are constructed.

While SAH opposes the language of Executive Order 13967 of Dec 18, 2020: “Making Beautiful Federal Civic Architecture” we strongly support a renewed effort to encourage excellence in the design and construction of federal buildings. That excellence should embrace the best architectural design and technology available, as well as a commitment to design as not only good urban design, but also sustainable design. American federal architecture should be made manifest in an architectural expression that is noble, durable, humane, sustainable, and, yes, beautiful.

The Society of Architectural Historians requests that Executive Order 13967 be rescinded immediately.

Sincerely,

Bryan Clark Green, Ph.D., LEED AP BD+C
Chair, Society of Architectural Historians Heritage Conservation Committee

cc: Mr. Kenneth Breisch, Ph.D.; Mr. Jeffrey Cody, Ph.D.; Mr. Anthony Cohn, AIA; Mr. David Fixler, FAIA; Ms. Priya Jain, AIA; Mr. Theodore H. Prudon, Ph.D., FAIA, Ms. Pauline Saliga; Ms. Deborah Slaton; Ms. Victoria Young, Ph.D.; Members, SAH Heritage Conservation Committee.