

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

**NATIONAL TRUST FOR HISTORIC  
PRESERVATION IN THE UNITED STATES,**

*Plaintiff,*

v.

**NATIONAL PARK SERVICE, et al.,**

*Defendants.*

Civil Action No. \_\_\_\_\_

**DECLARATION OF ALISON K. HOAGLAND**

I, Alison K. Hoagland, declare as follows:

1. The facts set forth in this declaration are based upon my personal and professional knowledge, and if called as a witness in this proceeding, I could and would testify competently thereto under oath. As to those matters that reflect an opinion, they reflect my personal and professional opinion on the matter.

2. I am a member of the National Trust for Historic Preservation in the United States (“National Trust”). I have been a member of the National Trust for more than 40 years. I am currently a Trustee of the National Trust and serve on its Executive Committee. In that role, I advise on the governance and policy-making of the organization. I have also previously served as an advisor to the National Trust on matters relating to Washington, D.C.’s interests in the formation of Trust policy.

3. In addition to my work as a trustee and advisor, I am an active individual member of the National Trust. The National Trust’s members, including myself, use, enjoy, derive benefit from, and have a substantial interest in preserving and protecting historic and cultural resources in Washington, D.C., including the White House and President’s Park, which have been impaired by

the destruction of the East Wing of the White House by the defendants in this action, and will be impaired further by the construction on the East Wing's former site of a ballroom substantially similar to that which the defendants propose to build.

4. Apart from my work with the National Trust, I am professor emerita at Michigan Technological University, where I taught history and historic preservation from 1994 to 2009. I received my BA from Brown University and my MA in American Studies, with a concentration in historic preservation, from George Washington University. I have written six books on various aspects of American vernacular architecture; my most recent is *The Row House in Washington, DC: A History* (University of Virginia Press, 2023).

5. Prior to my professorship, I was the senior historian at the Historic American Buildings Survey of the National Park Service, where I worked from 1979 to 1994. The Historic American Buildings Survey ("HABS") documents significant historic buildings with measured drawings, large-format photographs, and written histories, which are then made available to the public at the Library of Congress and online. Buildings documented by HABS are located nationwide and include major monuments and memorials in Washington, as well as the White House itself.

6. In my past capacity as a volunteer and also Vice President of the DC Preservation League (formerly Don't Tear It Down!), I oversaw projects, undertook research, and prepared landmark nominations concerning downtown Washington. Designation of the Downtown Historic District and the Fifteenth Street Financial Historic District (adjacent to the White House) resulted in part from my work. Alterations and demolitions of buildings in these historic districts, just as for any locally designated historic landmark, must be reviewed by the Historic Preservation Review Board before permits are granted.

7. I have previously served on the boards of various organizations engaged in history and historic preservation work, several of which have a particular focus on historic preservation in Washington, D.C. Among these, I have chaired the board of the Delaware Historical Society, chaired the Keweenaw National Historical Park Advisory Commission in Calumet, Michigan, and served as president of the Vernacular Architecture Forum. I have also served on the boards of the National Council on Public History, the Michigan State Historic Preservation Review Board, on the Committee of 100 on the Federal City, and on the board of the DC Preservation League.

8. I have also given walking tours for the Smithsonian Institution and public presentations to local groups on various aspects of Washington's historic architecture. In addition, I have published scholarly articles on the topic, including "Nineteenth Century Building Regulations in Washington, D.C.," Records of the Columbia Historical Society 52 (1989): 57-77, and "The Washington Public Library on Mount Vernon Square," Washington History 2, No. 2 (Fall 1990): 74-89.

9. I live on Capitol Hill, about 2 miles from the White House. I first moved to DC in 1977 and stayed until 1994, then returned in 2009 and have been here ever since. I travel to the White House neighborhood frequently to attend meetings, view exhibits, and have medical appointments. In the past year alone I have attended two rooftop gatherings with views of the White House. I regularly walk through portions of President's Park, including Lafayette Square, in order to enjoy the historic buildings, the beauty of the L'Enfant Plan (which placed the President's House on axis with 16<sup>th</sup> Street), and the innovative preservation project concerning the buildings surrounding Lafayette Square (overseen by Jacqueline Kennedy). I also regularly view the White House from the south side, whether driving by on Constitution Avenue or walking on the Mall.

10. Built beginning in the eighteenth century, the White House is one of the most historically significant buildings in the country. The White House was designed to be a symbol of the new nation, and debates occurred about its style, size, precedents, and name. As built, the “President’s House” was a neoclassical building, akin in size to an English country house. The selection of this design through a competition shows George Washington’s preference for a fairly modest building, not a palace. As such, the White House in its current form embodies some of the ideals on which the nation was founded. Architectural historians look for meaning in architecture, and the White House is one of the clearest examples of a building constructed with the explicit intention of imparting meaning with its style, size, and scale. The symbolic nature of the White House never fails to impress me, my students, and my out-of-town visitors. Further, the preservation of its essential nature—its republican simplicity—through many alterations and renovations of the building also reflects the attitudes and beliefs of subsequent occupants.

11. The White House affects my own research on more locally focused architecture in two ways. As one of the first prominent government buildings in the new capital city, it drove development around it, helping to define commercial and residential areas while also serving as a landmark defining L’Enfant’s plan for the city, and attesting to the promise that city construction would follow. Secondly, as the most important house in the city, the White House was also on the leading edge of all improvements—running water, water closets, electricity, etc. A study of Washington’s architecture without the White House as a reference point would be incomplete.

12. As a resident of Washington, D.C., I intend to continue to travel to the area around the White House, to walk through Lafayette Square, to attend functions in neighboring buildings, and to continue to be impressed by this iconic building. In the past I have had reason to be in the area about once a month, and I expect that pattern to continue. In addition, when the National

Trust holds its board meetings in Washington, which it does at least annually, it usually holds them at the Decatur House on the northwest corner of Lafayette Square. I plan to attend those meetings in 2026.

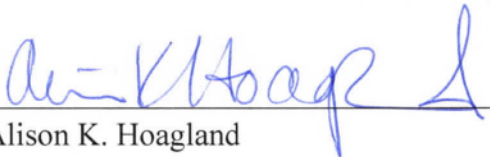
13. If a ballroom were constructed, similar to that which the defendants in this action have proposed to be built on the former site of the East Wing, it would cause permanent and irreparable harm to the White House and President's Park. To have an adjacent structure overshadowing the White House, exceeding it in height and massing, would diminish the primacy of the White House, which makes its architectural statement through its singularity on the landscape. No longer would the eye be drawn to the jewel of the building in the center, declaring to viewers that our president lives in a *house*.

14. Accordingly, I would suffer both professional and personal injuries, including to my aesthetic, cultural, and historical interests, if a ballroom of the proposed form and scale were constructed on the site of the former East Wing.

15. In the past, I have personally participated in public comment periods and public review meetings—across a variety of venues—considering building plans that would alter or impact sites of historic significance. As an example, I submitted comments to the National Capital Planning Commission and the D.C. Historic Preservation Review Board in 2013 and 2014 when those agencies were considering alterations to the Carnegie Library at Mount Vernon Square to accommodate the Spy Museum, a project that ended up not happening. I would intend to participate in any public review processes and comment periods made available for any project of significant scale at the White House, including the ballroom project that has been discussed by the defendants in this action, to provide insight and express concern regarding the adverse impact of such a project on a site of such historical import to its local and national community.

16. As with the rest of the American public, I have so far been denied the opportunity to participate in or comment on this project in any formal setting. The abrupt demolition of the East Wing has both deeply saddened me personally and affronted my professional work. But in particular, the project's proceeding without any of the legally mandated consultations and opportunity for public input presents a unique and irreparable harm to the public, one that I feel acutely as an architectural historian who has dedicated her career to studying the relationship between local people and their buildings.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

  
Alison K. Hoagland

Executed this 11<sup>th</sup> day of December, 2025.